



Coastal Environment S.32

May 2022



YOUR PLAN OUR FUTURE
TIMARU DISTRICT PLAN REVIEW
LAND USE PLAN

Timaru District Council

Section 32 Report Coastal Environment

May 2022

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1 Introduction

The Coastal Environment of Timaru is generally a narrow margin of land that lies between the Coastal Marine Area and the farmed hinterlands. It is a dynamic environment that has been altered by human activity i.e. the building of the railway line but continues to be subject to active coastal processes. The coastal environment contains several waterbodies and wetlands including the Rangitata, Ōpihi and Ōrāri River mouths, and Waitarakao/Washdyke Lagoon that are important breeding, feeding and resting places for braided river birds, wading birds and seabirds as well as areas of indigenous vegetation.

In general, outside of Timaru township and the small settlements, there is an absence of buildings and structures meaning that remoteness and wildness can be experienced across much of the coastal environment. However, opportunities for people to experience this are reasonably limited due in part to their distance from urban centres, and in part to the narrow width, and the relatively exposed nature of the coastal environment. Whilst several roads and tracks lead to the coastal environment, many of these are infrequently used, apart from those which are in proximity to Timaru Township and the clusters of holiday huts at South Rangitata and Milford.

Within the Timaru township, the coastal environment is accessible via a coastal walkway and Caroline Bay, an important area of open space that is valued by both the community and visitors. However, apart from the Port, there is little development within the coastal environment with the main township being located on rolling hills above the coastline. This elevated position means that extensive views of the coastal environment are available from the township, and this contributes to the Township's character and amenity.

The coastal environment is also subject to a range of coastal hazards including coastal erosion and coastal inundation (other natural hazards outside of the coastal environment are addressed in a separate chapter). The 100-year coastal erosion line and coastal inundation area have been identified on the District Plan maps, and the hut settlements at Rangitata and Milford and industrial areas at Washdyke and Pareora, Caroline Bay and the Port at Timaru lie at least in part within coastal hazard areas.

However, the coastal environment provides the community with a range of experiential and recreational opportunities from bird watching to walking, cycling and fishing. It also a generally quiet environment where the noise of the sea is dominant and expansive views of the skyline are available across the coastal marine area (CMA).

This report sets out an overview of the provisions in the operative District Plan that relate to the coastal environment; the way in which other District Plans address this topic; the policy framework that relates to the coastal environment, and an evaluation of the proposed District Plan objectives and options against section 32 of the RMA.

1.1 Community / Stakeholder / Iwi Engagement

1.2.1 Issues and options consultation

Consultation on district plan review discussion documents was undertaken in February 2017. The discussion document included matters relevant to the coastal environment were included in that consultation¹.

There was general support for the identification and protection of areas of outstanding or high natural character in the coastal environment. One respondent sought protection to cover areas that were not necessarily outstanding or high natural character but have other natural character values. There was general support for identifying areas of the coastal environment where natural character is degraded and including provisions enabling restoration. Some respondents sought provisions that take into account the acceleration of natural hazards such as coastal erosion and the effects of climate change.

Whilst there was general support for mapping of natural hazards in the District Plan this was coupled with some reservations about potential costs associated with such an approach if every known hazard was mapped. Additionally, respondents also indicated it was important to couple the mapping of natural hazards with an assessment of risk and an analysis of the sensitivity of activities to those hazards when drafting plan provisions.

A sensitivity-based approach to managing for natural hazards was generally supported, whilst noting that in some instances activities that are potentially sensitive to natural hazards (particularly infrastructure) at times have no other option but to be undertaken in natural hazard areas. There was strong support for inclusion of relevant provisions to give effect to the New Zealand Coastal Policy Statement and the Regional Policy Statement natural hazard requirements. One respondent sought provisions for farm operations within natural hazard areas, which have less risk than houses, schools or a hospital.

There was general support for managing activities on and around natural defences as well as encouraging the use of natural defences, where practicable.

1.2.2 Draft District Plan Consultation

The Council issued a draft district plan for consultation, with Feedback open between 7 October to 31 December 2020. The Council also held a drop-in day for natural hazards specifically, including natural hazards within the coastal environment on 18th November 2020 and invited stakeholders and landowners / occupiers who were potentially affected.

Submissions on the draft plan were received from various stakeholders with interests in the Coastal Environment overlay. In summary:

- Submitters with urban land (primarily industrial) within the coastal environment overlay, the coastal high hazard and/or coastal high natural character area were concerned about restricting future land use and development, including maintenance and upgrades and requested clarification / amendments to the associated rules.

¹ <https://www.timaru.govt.nz/services/planning/district-plan/district-plan-review/discussion-documents>

- Due to the functional and operational needs of the Port of Timaru and its supporting activities, there is some concern that the Port and its supporting activities are unnecessarily constrained.
- Regionally significant infrastructure agencies were also concerned that operational and functional needs are constrained by the proposed provisions, and consequently, the provisions do not give effect to relevant national and regional policy statements.
- Some submitters raised concerns that rural activities within the coastal environment were constrained and required more enabling provisions for maintenance and upgrading of buildings, farming, irrigation and horticultural planting.
- Some submitters considered that activities within coastal high hazard areas require greater technical evidence / assessment and also need to be considered under the Natural Hazards Chapter.

1.3 Strategic directions

The following strategic directions are considered to be particularly relevant to the Coastal topic:

SD-O2 The Natural and Historic Environment

The Natural and historic environment is managed so that:

- i. the health and wellbeing of the community are recognised as being linked to the natural environment;
- ii. an integrated management approach is adopted that recognises that all parts of the environment are interdependent;
- iii. the natural character of the coastal environment, wetlands and waterbodies is preserved and protected from inappropriate subdivision, use, and development;
- iv. important landscapes and features are protected from inappropriate subdivision, use, and development;
- v. significant indigenous vegetation and significant habitats of indigenous fauna are identified and their values recognised, protected and where appropriate, enhanced;
- vi. the life-supporting capacity of ecosystems and resources is safeguarded for future generations;
- vii. the important contribution of historic heritage to the district's character and identity is recognised, and significant heritage and its values are protected from inappropriate subdivision, use, and development.

It is intended that the natural character of the coastal environment is preserved, whilst recognising the interrelationship with landscapes and features, and significant indigenous vegetation and significant habitats of indigenous fauna as well as the need to provide for the health and wellbeing of the community.

SD-O3 Climate Change

The effects of climate change are recognised, and an integrated management approach is adopted, including through:

- i. taking climate change into account in natural hazards management;
- ii. enabling the community to adapt to climate change;
- iii. encouraging efficiency in urban form and settlement patterns.

SD-O4 Natural Hazards

Natural hazards risks are addressed so that:

- i. areas subject to natural hazards and risk are identified;
- ii. development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; and
- iii. for other areas, natural hazards risks are appropriately mitigated.

These strategic objectives seek to manage the effects of climate change and natural hazards (including coastal hazards) on development. This includes avoiding development in areas of 'unacceptable risk'. This is not clarified and is assumed to mean significant i.e., coastal areas subject to erosion or inundation during the next 100 years. In areas where the risk from natural hazards is 'acceptable', the objectives suggest that development can occur if the hazards are mitigated. Presumably, this could include buildings with minimum floor heights or buildings that are relocatable.

SD-O5 Mana whenua

The mana whenua status of Kāti Huirapa is recognised and their historic and contemporary relationship with the district's land, water bodies and wetlands, coastal environment, and indigenous species is recognised and provided for by ensuring:

- iv. mahika kai resources and habitats of indigenous species are sustained and opportunities for their enhancement or restoration are encouraged;
- v. the health of water body and wetland environments is protected from adverse effects of land use and development;
- vi. the values of identified sites and areas of significance to Kāti Huirapa are recognised and protected;
- vii. Kāti Huirapa retains, and where appropriate is able to enhance access to their sites and areas of significance
- viii. Kāti Huirapa retains, and where appropriate is able to enhance, access to wāhi tūpuna, wāhi tapu and mahika kai;
- ix. Māori reserve lands are able to be used by Kāti Huirapa for their intended purposes;
- x. Kāti Huirapa are able to carry out customary activities in accordance with tikanga; and;
- xi. Kāti Huirapa are actively involved in decision making that affects their values and interests in these matters and are able to exercise their kaitiakitaka responsibilities.

The objective recognises the many relationships that mana whenua has with the whenua and the wai, which comprise the coastal environment of Timaru District. The objective recognises the role of Kāti Huirapa in decision making and the variety of uses and values they hold. The objective should underpin all the subsequent objectives and policies of the Coastal Environment Chapter.

1.4 Problem definition

1.4.1 The efficiency and effectiveness of the Operative Plan

The Operative Plan does not map the Coastal Environment or contain a Coastal Environment chapter. The coastal environment is essentially zoned as Rural 3 Zone. This zone is described as covering those areas of the coastal environment of the district which retain a high degree of natural character, and where inappropriate use and development would threaten those natural character values. However, areas with natural character are not specifically identified on the planning maps.

One objective seeks to protect and enhance the ecological functioning, natural character and integrity of the coast from inappropriate subdivision and development. This is supported by a policy that seeks to avoid, remedy or mitigate adverse effects on natural areas containing the coastal environment, and sets out the matters that Council will have regard to including the character and coherence of the coastal environment, its visual qualities and amenity values.

The rules in the Rural 3 Zone permit:

- The protection and/or enhancement of indigenous vegetation and habitats of indigenous fauna.
- Walking tracks, pedestrian bridges, board walks and related minor structures that are necessary for those tracks.
- Farming (other than factory farming and outdoor non-intensive pig farming) including fencing, but not including the farming of wetlands.
- Home occupations and home stays in existing household units.
- Maintenance of existing public roads and bridges, vehicle access tracks and stock access tracks.
- Accessory buildings to existing household units and farming.
- Maintenance and minor upgrading of existing utility services; and the establishment or upgrading of utility services which are covered by the Definition of Utility Services (1), (2) or (5) in Part D7 of the Plan not within areas of significant indigenous vegetation or significant habitats of indigenous fauna or within active beach systems.
- Maintenance and minor upgrading of existing public utilities, telecommunication facilities and radio communication facilities.
- Helicopter landing sites for the purpose of servicing telecommunication and radio communication facilities, and public utilities outside of areas of significant indigenous vegetation or significant habitats of indigenous fauna.
- Clearance, disturbance and trimming of vegetation which is not significant indigenous vegetation or significant habitats of indigenous fauna, or significant trees.
- Minor trimming or disturbance (i.e., the removal of branches from trees/shrubs and the removal of seedlings/saplings) of significant indigenous vegetation or significant habitats of indigenous fauna within 5 metres of existing fences, existing stock access tracks, state highways, public roads, utility services, public utilities, radio communication facilities and telecommunication facilities.
- Trimming and removal of significant indigenous vegetation which is necessary for the maintenance of existing transmission lines and that this activity shall not be subject to compliance with the performance standards.
- Shelterbelts and harvesting of trees in shelterbelts, woodlots, and forestry.
- Drainage works other than those affecting wetlands.
- Prospecting and exploration (not involving excavation or dredging) as defined in the Crown Minerals Act 1991, which does not disturb significant indigenous vegetation and significant habitats of indigenous fauna.
- Extraction of shingle, gravel and sand materials that is permitted by a rule in a Regional Plan or which has been granted resource consent from the Canterbury Regional Council under the Resource Management Act 1991.
- Land-based recreational activities not including buildings or structures, and not including use of aircraft or motorised vehicles in wetlands or in areas of significant riverbed and coastline habitat during bird breeding seasons.
- Those activities provided for in the General Rules as permitted activities other than filling of sites in or within 50 metres of wetlands.

- Utility services not within significant indigenous vegetation and significant habitats of indigenous fauna.

Discretionary activities

- Building accessory to any permitted activity not provided for as a permitted, controlled or discretionary activity. Council shall restrict its discretion to the environmental effects associated with the matters listed in Policy 1.3.3(1).
- Any programme of restoration or rehabilitation to enhance the amenity, ecological, or landscape values of an area which involves the excavation or accumulation of soil or other materials. Council shall restrict its discretion to the environmental effects associated with the matters in Policy 1.1.7 and Policy 1.3.3.
- Vehicle tracks and stock access tracks through rivers including streams.
- Utility services within significant indigenous vegetation and significant habitats of indigenous fauna.
- Mining, quarrying, extraction of soil, rock, shingle, gravel and sand materials occurring naturally on or beneath the site not provided for as permitted activities.
- Public utilities.
- Telecommunication facilities and radio communication facilities. Council shall restrict its discretion to potential visual effects and effects on indigenous flora and fauna in natural areas.
- Buildings accessory to any discretionary activities.
- Subdivision provided that all allotments have a minimum area of 10 hectares except for esplanade reserves for which there will be no minimum area.
- Any activity listed as a permitted, controlled or discretionary activity.

Non-Complying activities

- Clearance by any means (including burning and spraying with herbicides) of significant indigenous vegetation and significant habitats of indigenous fauna.
- Drainage affecting wetlands and reclamation (or infilling) of wetlands.
- Household units and other types of residential activities.
- Farming in wetlands.
- All other activities in this zone are non-complying unless they are provided for by a General Rule.

Performance Standards

- Minimum of 6 metre setback from boundaries with a road frontage and 3 metres from other site boundaries.
- Recession planes apply.
- Maximum building height of 8 metres.
- The planting of trees for shelterbelts, woodlots or forestry subject to standards.
- Construction of fencing shall avoid the clearance of areas of significant indigenous vegetation or significant habitats of indigenous fauna.
- Shelterbelt, woodlot or forestry plantings, and harvesting of trees or clearance of vegetation in riparian margins, subject to standards.
- Helicopter landing sites if set back 30 metres from the edge of any wetland.
- Buildings and structures if set back a minimum of 30 metres from the edge of any wetland, 20 metres from the margin of any river or stream and 200 metres landward from the coastal marine area boundary, except that minor farm buildings and structures (less than 10 square metres ground footprint) and bridges authorised by the Canterbury Regional Council are exempt from this performance standard.

- Earthworks set back 10 metres from the bank of any river including streams, except for crossing places, including bridges and their approaches and 200 metres landward of the coastal marine area boundary, and 30 metres from the edge of any wetland.
- All cultivation shall be set back from rivers, streams and wetlands as follows:
 - 2metres on slopes < 5° gradient
 - 3 metres on slopes > 5° gradient
 - 20 metres for all wetlands
- Grazing of stock in the riparian areas.
- No lighting exceeding 20 lux measured in the horizontal or vertical planes shall fall on adjoining properties.
- Noise levels not exceeding 50dBA L10 at the notional boundary of the nearest household unit on any other site between 7.00am and 10.00pm on any day, and 40dBA L10 and 70dBA Lmax at all other times.
- Audible bird-scaring devices (including firearms were used for this purpose) subject to conditions.

The wording of some of the rules is confusing i.e., home occupations and home stays in existing household units. It is assumed that it means the house needs to exist prior to establishing a home stay but the word 'existing' seems unnecessary. Furthermore, what if the home occupation doesn't occur in the household unit. It is unclear what would be the difference in potential effects if it occurred in another building on the same property.

There is also cross-over with regional council rules and the National Environmental Standard for Freshwater Management that manage wetlands i.e., drainage works and extraction of shingle, gravel and sand materials. The matters to be considered by a district and regional council differ, and TDC should focus on visual and amenity effects, effects on natural character and recreational opportunities.

There is no limit on the scale of buildings that are accessory to existing household units and farming, instead it appears that a default discretionary activity status is applied. There is also no provision for small-scale buildings associated with other activities that may be appropriate in the coastal environment.

Coastal hazards

The planning maps in the Operative Plan identify the 100yr coastal erosion line and coastal inundation line.

The objectives and policies seek to avoid further non-essential development or redevelopment in the most hazard prone areas of the district, especially adjacent to the sea. Non-essential development is seen as being new residential and other intensive development including commercial and industrial developments. However, the Plan does provide for the reconstruction of existing household units and holiday huts, and the modification of existing dwellings to decrease the level of flood risk or damage. There is no specific policy framework that applies to utilities despite these often being provided for in 'at risk' areas. There are also objectives and policies that seek to improve knowledge of natural hazard risks, minimise risks to life and property from land subsidence, and minimise costs to the wider community from measures to reduce the exposure of individuals or particular communities. Overall, it is noted that the policies and rules appear to refer to flooding rather than coastal erosion and inundation.

The rules also do not appear to specifically refer to the 100yr coastal erosion line, take into account climate change or sea level rise or control all development seaward of this line.

The Recreation 1 Zone seeks to manage new development in most of the hut settlements whilst providing for the reconstruction or modification of existing household units including holiday huts at Milford Huts. Subdivision for utility services, public utilities, telecommunication facilities and radiocommunication facilities requires consideration of natural hazards.

The rules in District Wide Rules Part D6.16 are as follows:

Discretionary activities

- The reconstruction of existing household units at Milford Huts which fail to meet the timeframes specified in section 10 of the Resource Management Act (i.e., existing use rights).

Non-complying activities

- Any residential activity with a floor height which does not meet the permitted activity standards except at Milford Huts.

Prohibited activities

- Household units (including holiday huts) and other residential activities within any area identified in the planning maps as subject to coastal inundation, except those provided for as discretionary activities in the Recreation 1 Zone at Milford Huts only.

Whilst the rules appear to have been reasonably effective at managing risks from coastal inundation, the need to take potential climate change into consideration may increase the risk from coastal erosion and inundation. As such, the rules need to be updated and some of the rules could be reworded to ensure clarity and a clearer understanding of their intent, as well as aligning the rules with the predicted level of risk.

1.5 Issues identified

The **Rural Discussion Document** prepared by TDC in November 2016² did not identify any matters specifically related to the coastal environment.

The **Landscapes and Natural Character Discussion Document**³ prepared by TDC in November 2016 identified that the current District Plan identifies a rural coastal environment which controls certain activities within it. However, the District Plan does not identify areas of outstanding or high natural character in the coastal environment or specifically control activities within these areas. Investigation is needed on whether areas of outstanding or high natural character exist in the district, which are not otherwise suitably protected by regional plans, or other rules in the District Plan.

Furthermore, consideration is required for what controls on activities within these areas should apply. Consideration is also required as to what opportunities exist for restoring areas of degraded natural character in the coastal environment, and to enable activities which support their restoration.

² <https://www.timaru.govt.nz/services/planning/district-plan/district-plan-review/discussion-documents>

³ <https://www.timaru.govt.nz/services/planning/district-plan/district-plan-review/discussion-documents>

The **Natural Hazards Discussion Document** prepared by TDC in November 2016⁴ identified the following issues with the operative Plan:

Should areas of known natural hazard risk be mapped in the District Plan?

The current approach means that the presence of a known natural hazard is not necessarily a trigger for resource consent, despite the fact that in some instances, the natural hazard risk is high, and development should be discouraged in certain areas. In other instances, critical infrastructure and development are in locations subject to natural hazards and hazard mitigation methods, such as stop banks and other hard protection structures are required.

Council's knowledge of natural hazards in the district is continually growing as further study is undertaken, including that in conjunction with Canterbury Regional Council. Furthermore, climate change may increase the risks from some natural hazards. It is therefore suggested that the approach taken in addressing natural hazards in the District Plan should be able to accommodate new information. As a result, consideration of the nature and extent of Natural Hazard Mapping in the District Plan is required.

Should the District Plan take a sensitivity-based approach to activities in natural hazard areas?

This approach would take into consideration the sensitivity of the land use to natural hazard risk and provide for appropriate activities in hazard prone areas. For example, in a rural zone grazing / farming would be permitted but a new dwelling may be subject to a consent process and/or a minimum floor height standard or prohibited depending on the level of risk.

In an urban context, land can be zoned according to its risk from natural hazards i.e., land adjacent to rivers is zoned as open space rather than for residential activities. The other way a sensitivity approach can be applied is to restrict activities that can influence or increase the hazard risk.

Should the District Plan include provisions relating to natural defences?

Natural defences, such as wetlands or vegetated dunes, have a role to play in addressing river and coastal flooding and could be (a) protected by plan provisions and (b) considered as an alternative to hard protection structures.

1.5 Background

1.5.1 Tsunami

There is limited modelling of the tsunami risk for Timaru, but it is understood that ECan are planning to update this work in due course. Other Districts in Canterbury have had some relatively recent modelling done, which has assisted Council's updating the tsunami evacuation zones. However, this matter will generally be managed outside of the District Plan and ECan are comfortable with this approach remaining.

⁴ https://www.timaru.govt.nz/data/assets/pdf_file/0005/95846/1015619-Discussion-Document-Topic-4-Natural-Hazards-Discussion-Document-Work-District-Plan-Review-November-2016.pdf

1.5.2 Climate change

The national information and guidance on sea level rise⁵ takes global forecasts and applies them to the New Zealand national context. There is a close comparison between global and New Zealand average historic rates of sea level rise which means that projections of future sea-level rise which are generated as global means, can generally be adopted for overall use in New Zealand. Small local adjustments for significant local vertical land movement may be needed⁶.

According to the IPCC Fifth Assessment Report (IPCC, 2013), global sea-level rise will likely be in the range 0.28-0.98 m by 2100. However, onset of the collapse of the polar ice sheets could cause global mean sea level to rise substantially above the likely range during this century. The more recent IPCC Sixth Assessment Report (IPCC, 2022) highlights similar trends. Recent observations reveal a rapid thinning of glacier regions in Antarctica, which can be attributed partly to warming oceans. These findings have raised concerns of an accelerated ice loss of the West Antarctic ice sheet and potential contributions to global sea level rise.

The aforementioned MfE guidance has been developed on the principle that no one particular or 'most likely' climate future can be determined, due to uncertainty around future global emissions pathway and the emergence of polar ice sheet instabilities. Therefore, the guidance states that planning for coastal areas needs to consider several scenarios to cover the range of possible futures. Overall, the literature presents an uncertain future for Canterbury in terms of sea level rise and rainfall frequency and intensity. As such, a precautionary approach should be taken when managing natural hazards that may be affected by climate change.

1.5.3 Regionally Significant Infrastructure

It is recognised that there is regionally significant infrastructure within the coastal environment: this includes the Port in Timaru, and other infrastructure assets such as Transpower lines. Whilst they have a functional need to locate within the coastal environment, this can also mean that they are located within high coastal hazard areas. Whilst it is likely that the Port and other infrastructure providers will be able to manage the effects of coastal erosion and inundation, there may be limitations to this i.e., the Port may be limited in its ability to increase the height of the wharfs, as they need to access/service vessels. The Council engaged with the Port after the draft District Plan was notified to determine its future aspirations and ability to manage risks from coastal hazards (see the relevant draft submissions summary tables).

1.5.4 Technical reports

Coastal erosion

The Timaru Coastal Erosion Assessment Report prepared by Jacobs⁷ identifies a range of possible future shoreline positions. These take into account historic shoreline movements, the magnitudes of past short-term storm erosion, the impacts of various magnitudes of sea level rise on future erosion, coastal processes, and how the varying morphology and geology of the coastline control the plan shape of the shoreline. This report has informed Council's understanding and decisions on managing coastal erosion.

⁵ <https://environment.govt.nz/publications/coastal-hazards-and-climate-change-guidance-for-local-government/> Page 80.

⁶ Page 101 of the above report

⁷ Timaru Coastal Erosion Assessment Report <https://www.timaru.govt.nz/pdp-supporting-info>

The worst sediment losses occur along the 12km of the Washdyke-Seadown coast south of the Ōpihi River, estimated to be 20,000m³/yr to northward transport and 10,000m³/yr to abrasion. With limited gravel input from the south, the low gravel ridge along this section of coastline has experienced on-going rapid erosion over the last 150 years. This erosion and beach rollover have dramatically reduced the area of Washdyke Lagoon and the Ōpihi mouth Lagoon, and overpowered coastal stop banks first constructed in the 1930's to protect the low-lying coastal farmland from sea inundation resulting in them having to be relocated landward at least twice.

For the purposes of the Proposed District Plan and the management of risks from coastal erosion, the Council has determined to apply the P50 (most likely position) for the future shoreline in 2120 given a sea level rise of 1.2m (chosen for consistency – see discussion below).

Coastal inundation

NIWA has prepared a report on coastal inundation (Timaru District Coastal Hazard Assessment) that has informed the Council's management approach.⁸

There are stop banks between Washdyke Lagoon and the Rangitata River, and whilst these are overtopped during large coastal storms, they are effective at limiting the inundation extent. However, the effect of these structures diminishes with sea level rise and the district is subject to significant inundation, with the extent varying according to the sea level rise scenario that is used. The Council has chosen to apply a sea level rise of 1.2m. It is noted that a conservative approach to sea level rise has been taken, in lieu of any consideration of coastal erosion when determining the extent of future inundation and the precautionary approach advised by MfE.

Coastal Environment and Natural Character

The District Landscape and Coastal study⁹ identifies the Coastal Environment and within this the areas of High Natural Character. There are no areas with outstanding natural character identified. This report sets out the methodology for identification based on national best practice and the NZCPS. In addition, there is one ONF within the coastal environment, located at Dashing Rocks.

1.5.5 Other relevant documents and reports

Timaru District recreational hut communities, overview assessment of flooding and coastal hazards ¹⁰	ECan	June 2020	Canterbury Regional Council (Environment Canterbury) has provided a summary of expected natural hazards and their potential impacts on each of the holiday hut communities. The report concludes that the holiday huts at South Rangitata, Milford and Waipopo are at risk from coastal inundation during the next 100 years under a 1.2m sea level rise scenario.
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1.5.6 Other District Plan approaches

⁸ Timaru District Coastal Hazard Assessment NIWA 2020. <https://www.timaru.govt.nz/pdp-supporting-info>

⁹ Boffa Miskell Ltd, June 2020, Timaru District Landscape and Coastal Study. <https://www.timaru.govt.nz/pdp-supporting-info>

¹⁰ Ecan 2020 Recreational Hut Communities overview assessment of flooding and coastal hazards <https://www.timaru.govt.nz/pdp-supporting-info>

The provision and management of coastal hazards is an issue that has been addressed by several Council's around New Zealand. The approaches taken by Selwyn, Ashburton and Hurunui District Councils and Christchurch City Council are documented below.

Plan	Description of Approach
<p>Selwyn District Plan (operative, 1st generation under review)</p>	<p>The planning maps do not identify the coastal environment. The objectives, policies and rules focus on Te Waihora/Lake Ellesmere rather than the coastal environment as a whole.</p> <p>The Plan identifies several natural hazards including coastal erosion.</p> <p>The objectives seek to ensure that activities do not lead to or intensify the effects of natural hazards, and that potential loss of life or damage to property from natural hazards is mitigated, whilst not creating or exacerbating adverse effects on other people or the environment.</p> <p>The policies seek to:</p> <ul style="list-style-type: none"> • promote awareness among residents of natural hazard risks, and ways to minimise loss of life and damage to property. • Avoid new residential or business development in areas at risk from natural hazards unless any potential risk can be adequately mitigated. • Mitigation measures do not lead to or intensify a potential natural hazard elsewhere, and any other effects are managed. • Develop the information base on the location and characteristics of natural hazards. <p>The rules provide for the following activities:</p> <p>Permitted</p> <ul style="list-style-type: none"> • Any new dwelling or other principal building, except: • Seaward of the Coastal Hazard 1 Line. <p>Non-Complying</p> <ul style="list-style-type: none"> • Any new dwelling, or part dwelling thereof, or other principal building, on Lots 58 to 108 shown on the Plan attached as Appendix 24 at Rakaia Huts.
<p>Proposed Selwyn District Plan</p>	<p>The second-generation Proposed Selwyn District Plan contains coastal natural hazards provisions within the natural hazards chapter.</p> <p>The planning maps identify a coastal erosion overlay, coastal inundation overlay and a tsunami policy overlay.</p> <p>Policies cover hard protection structures and natural defences and seek to manage vulnerable people within the Tsunami policy overlay. The plan also seeks to recognise and provide for climate change and its influence on sea levels and the frequency and severity of natural hazards.</p> <p>Rules seek to manage coastal natural hazard mitigation works, and buildings and earthworks within the coastal erosion overlay and coastal inundation overlay.</p>

<p>Ashburton District Plan (operative, 2nd generation)</p>	<p>The planning maps do not identify the coastal environment. The objectives, policies and rules do not include specific consideration of the coastal environment treating it as part of the Rural Zone, or in the case of the hut settlements: Residential and Open Space Zones. The assessment matters i.e., those considering the effects of tree planting, earthworks, deposition of clean fill and buildings consider potential effects on natural character. However, the planning maps do not identify areas of outstanding or high natural character and the provisions do not reflect the requirements under the NZCPS.</p> <p>The planning maps identify mean high-water springs but not the coastal hazard line.</p> <p>Both the Residential and Rural Zones contain objectives and policies that address natural hazards. These seek to avoid or mitigate potential effects of natural hazards on development and to avoid the establishment of new developments including infrastructure such as road and rail links, which may result in a requirement for new coastal protection works. Also, to avoid adverse effects from natural hazard mitigation activities on the natural character and values of the environment and, any cultural values.</p> <p>The zone standards require that no additional residential units are constructed in or relocated into the Residential B Zone at Hakatere, Rakaia or Rangitata River Mouths. Non-compliance with these standards is a non-complying activity.</p>
<p>Hurunui District Plan (operative, 2nd generation)</p>	<p>The planning maps identify the Coastal Environment Area. The Coastal Environment chapter identifies a range of issues including modification of the natural character of parts of the coastal environment, providing for public access and recreational pursuits, effects on cultural sites, hazards, integrated management of the land, sea and freshwater environments, appropriate stormwater and sewage disposal, impacts of buildings on the coastal skyline and landscape and farmers having flexibility in their land uses and farming operations while recognising the values of the coastal environment.</p> <p>There is one objective that seeks to protect and maintain the coastal environment from inappropriate subdivision, use, and development; through the preservation of the natural character of the coastal environment, maintenance of ecological function and habitats, and maintenance and enhancement of recreational, visual and cultural values. This is supported by six policies that seek to:</p> <ul style="list-style-type: none"> • identify the extent and characteristics of the different parts of the coastal environment. • adopt a cautious approach in making decisions which affect the coastal environment. • recognise the significance of the coastal environment to Ngāi Tahu. • protect the coastal environment from inappropriate subdivision, use and development.

	<ul style="list-style-type: none"> • give consideration to increased development potential where significant benefits or enhancement are achieved, including restoration or rehabilitation of natural character. • provide for public access and recreational activities. • enable activities within the Coastal Environment Area where they have been historically established and continuously maintained. <p>The rules permit:</p> <ul style="list-style-type: none"> • Earthworks for the purpose of maintenance/repair/replacement of existing fence lines, vehicle tracks, roads, firebreaks, drains, waterlines, ponds, dams, waterway crossings, or utilities, of the same or similar scale. • The establishment of a post and wire fences, troughs, and water tanks within an area of improved pasture. • Recreational activities but not including commercial recreational activities or activities that involve motorised vehicles within identified areas. • Buildings and structures. • Underground utilities and associated earthworks within formed road reserves. • Customer service connections either underground or overhead utilising existing support poles including associated earthworks. • The maintenance, repair or replacement and upgrading (subject to limits) of utilities. • Existing forestry, new forestry and the establishment of new shelterbelts and erosion control plantings. <p>Controlled:</p> <ul style="list-style-type: none"> • The establishment of forestry, including afforestation (as defined under the National Environmental Standards for Plantation Forestry 2017). <p>Restricted discretionary:</p> <ul style="list-style-type: none"> • Buildings and structures which do not meet the standards for a permitted activity. • A second or subsequent dwelling, or minor dwelling unit, where the site is 40 ha or greater in area. • Earthworks, which are not identified as a permitted or controlled activity. • The establishment of forestry, including afforestation which exceeds 5ha in area or 3.5% of the site, whichever is the greater, per site in any 10-year period, in the coastal environment. • Use of motorised vehicles in areas outside those identified in the permitted activity list. • Utility buildings and structures within the coastal environment, which do not meet the standards for a permitted activity and are not otherwise specified as a non-complying activity.
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	<ul style="list-style-type: none"> • Utility buildings and structures within an area of outstanding natural character or outstanding natural feature or landscape in the coastal environment. • Above ground utility lines and support structures. • Planting (including new shelterbelts and erosion control plantings, but excluding planting defined as afforestation or replanting in the National Environmental Standards for Plantation Forestry 2017). <p>Non-Complying:</p> <ul style="list-style-type: none"> • Buildings and structures (excluding utility buildings and structures) which are not identified as a permitted, controlled or restricted discretionary activity. • A second or subsequent dwelling or minor dwelling unit, on a site under 40 ha in area. • Any buildings, structures (excluding utilities buildings and structures located within formed road reserve), and new forestry, within 100 m horizontally of Mean High-Water Springs, or within the Coastal Hazard Line, whichever is the most restrictive. • The establishment of new forestry that does not meet other rules in the Plan. • Mineral extraction activities. <p>The planning maps identify coastal hazard line and coastal hazards. The plan also contains a schedule of coastal hazard areas.</p> <p>Chapter 15 contains the objectives, policies and rules that manage natural hazards.</p> <p>The objective provides for subdivision, use and development while avoiding or mitigating the adverse effects of natural hazards.</p> <p>The policies seek to avoid subdivision, use and development:</p> <ul style="list-style-type: none"> • if the risk from the natural hazard is unacceptable and in high hazard areas, the matters in Policy 11.3.1 of the Canterbury Regional Policy Statement 2013 are not met. • seaward side of the Coastal Hazard Line unless the proposed development is the repair or upgrade of existing infrastructure. <p>The policies also seek to:</p> <ul style="list-style-type: none"> • recognise that climate change could alter the frequency and duration of some natural hazard events. • assess the risks of natural hazards prior to land being rezoned and to avoid or mitigate those risks. • ensure that mitigation works are undertaken in a way which avoids, remedies or mitigates adverse effects on cultural, social and environmental values and the health and safety of communities.
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	<p>The Plan permits any activity within a Natural Hazard Area or a Natural Hazard Assessment and Awareness Area that complies with the relevant standards.</p> <p>Any activity that does not meet any one or more of the standards for permitted activities and is not classified as a non-complying activity, and subdivision of land within a Natural Hazard Area or Natural Hazard Assessment and Awareness Area that complies with the standards for controlled activities, are discretionary activities.</p>
<p>Christchurch District Plan (operative, 2nd generation)</p>	<p>The planning maps identify an Open Space Coastal Zone, the Coastal Environment and areas of natural character and at least High Natural character.</p> <p>The Natural and Cultural Heritage chapter contains two sub-chapters: Landscapes and Natural Character and the Coastal Environment. The Landscapes and Natural Character chapter contains one objective that seeks that the natural character of the Christchurch District's coastal environment, wetlands, and lakes and rivers and their margins is preserved. This is supported by two policies that recognise a range of natural elements, patterns, processes and experiential qualities contribute to natural character, and recognise and preserve the natural character qualities of areas within the coastal environment that have outstanding natural character as described in Appendix 9.2.9.1.5; high (and very high) natural character as described in Appendix 9.2.9.1.5; and other areas with natural character, and protect those qualities from inappropriate subdivision, use and development through a range of measures. The policies also require an assessment of cumulative effects and promote opportunities to restore and rehabilitate natural character.</p> <p>The rules are set out in a table with different activity status applying to activities in areas with natural character as to areas with at least high (HNC) and outstanding natural character (ONC). Only additions up to 40m² to existing buildings are permitted in areas with ONC whereas public amenity buildings with a footprint ≤ 100m² and limited to one per site are permitted in areas with natural character. A residential unit (including additions that are 40m² or greater) within a building area identified on an approved plan of subdivision is a restricted discretionary activity. Otherwise, a residential unit is a non-complying activity.</p> <p>The Coastal Environment chapter contains two objectives: one that people, and communities are able to provide for their social, economic and cultural wellbeing and their health and safety, while maintaining and protecting the values of the coastal environment and public access to and along the Coastal Marine Area is maintained or enhanced.</p> <p>These are supported by three policies that seek to ensure that:</p> <ul style="list-style-type: none"> • subdivision, use and development is of a scale, and located, to maintain and protect the values of the coastal environment; and

- existing public access to the Coastal Marine Area is maintained and additional public access provided in certain circumstances; and
- recognise that the landward extent of the coastal environment varies according to the dynamic nature of the values, processes and qualities present.

There are no specific rules but there are a range of assessment matters to manage the effects of activities on the coastal environment. These are linked from rules in the Plan.

The coastal environment within Christchurch City is also identified as being in a flood management area.

Objectives and policies seek to avoid new subdivision, use and development in areas where risk from natural hazards is unacceptable. This requires a determination to be made by the Council on a case-by-case basis, but presumably would include development within high flood hazard management areas, rockfall and slope instability areas. Critical infrastructure is sought to be avoided in areas at significant risk from natural hazards, and such infrastructure should be designed to keep functioning during and after natural hazard events and recognise the benefits of infrastructure and the need for its repair, maintenance and ongoing use in areas affected by natural hazards. The policies also seek those activities do not transfer or create unacceptable risk from natural hazards to other areas, and that natural features that avoid or reduce risk from natural hazards are protected. There are also policies on raising public awareness of natural hazards and that the level of assessment of natural hazards reflects their scale and significance. The policies also provide clear guidance on the mapping of flood management areas and the management of activities within them.

The Plan has sets of rules that apply in different management areas i.e., Flood Management Area (FMA), Flood Ponding MA and High Flood Hazard MA. Of particular relevance, in the FMA, the Plan permits new buildings within and outside Fixed Minimum Floor Overlay (FMFO) and additions that increase ground floor area provided certain standards are met.

Development outside FMFO requires the applicant to obtain a Minimum Floor Level Certificate from Council. The Plan also permits a range of other activities including small scale additions, garages, utilities, filling and excavation for certain activities. Otherwise, activities are restricted discretionary. More restrictive rules apply in the High Flood Hazard MA, where no new residential buildings are permitted. Residential units in the Residential Unit Overlay (within the High Flood Hazard Management Area) are restricted discretionary activities and outside these overlays are non-complying.

1.6 Statutory and Planning Context

Statutory document	Alignment requirement for Proposed District Plan	Comment
NZCPS	Give effect to	Implement according to the applicable policy statement's intentions.
NPS/NES		
CRPS		
Regional Coastal Environment Plan	Not be inconsistent with	Are the provisions of the Proposed DP compatible with the provisions of these higher order documents? Do the provisions alter the essential nature or character of what the higher order documents allow or provide for?
Canterbury Land and Water Plan		
Specific management plans and strategies prepared under other legislation	Have regard to	Give genuine attention and thought to the matter As above.
Ashburton District Plan	Have regard to the extent to which there is a need for consistency	
Waimate District Plan		
Westland District Plan		
Mackenzie District Plan		
Iwi Management Plan of Kāti Huirapa	Take into account	Address the matter and record
Te Whakatau Kaupapa Ngai Tahu Resource Management Strategy for the Canterbury Region		

1.6.1 Resource Management Act

The key provisions of the Resource Management Act of direct relevance to this topic include:

Section 6 – Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

(a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.

(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers.

(h) the management of significant risks from natural hazards.

The coastal environment in Timaru contains areas that have been identified in the Landscape and Coastal Assessment as having high natural character. All other areas in the coastal environment have some natural character that must be preserved and protected from inappropriate subdivision, use and development. Guidance as to what is inappropriate can be found in the New Zealand Coastal Policy Statement (NZCPS).

The holiday huts at Milford and South Rangitata, and in part at Waipopo are located in areas that are subject to high risk from coastal erosion and coastal inundation. Therefore, the provisions for the holiday huts will need to ensure that any risk to property and human life from coastal hazards is appropriately managed including avoiding development in high hazard areas.

Section 7 – Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

(c) the maintenance and enhancement of amenity values.

(f) maintenance and enhancement of the quality of the environment.

The coastal environment in the Timaru District is a generally high-quality environment with amenity values that are appreciated by the public. As such, these need to be maintained and enhanced through the provisions in the Coastal Environment chapter.

Section 31 – Functions of territorial authorities

(1) Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:

(b) the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—

(i) the avoidance or mitigation of natural hazards; and....

Provisions in the Plan will seek to ensure that the use and development of land will avoid areas subject to significant effects from natural hazards and mitigate any potential adverse effects from natural hazards, where this is appropriate.

1.6.2 National Policy Statements

A territorial authority must prepare and change its district plan in accordance with national policy statements.¹¹ The proposed District Plan must give effect to National Policy Statements.¹² The following National Policy Statements are of relevance to the Coastal topic:

National Policy Statements	Relevance
<p>New Zealand Coastal Policy Statement 2010</p>	<p>The purpose of the NZCPS is to state policies in order to achieve the purpose of the Act in relation to the coastal environment of New Zealand. It seeks to:</p> <ul style="list-style-type: none"> • safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land. • preserve the natural character of the coastal environment and protect natural features and landscape values. • take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment. • maintain and enhance the public open space qualities and recreation opportunities of the coastal environment. • ensure that coastal hazard risks taking account of climate change. • enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development. • ensure that management of the coastal environment recognises and provides for New Zealand’s international obligations regarding the coastal environment, including the coastal marine area. <p>The objectives are sought to be achieved through 29 policies that:</p> <ul style="list-style-type: none"> • recognise the elements included in the coastal environment. • adopt a precautionary approach to activities whose effects are unknown or not fully understood. • Integrated management of natural and physical resources. • Manage the potential adverse effects of activities. • Undertake spatial planning for future development. • Preserve natural character and to protect it from inappropriate subdivision, use, and development. • Promote restoration or rehabilitation of the natural character.

¹¹ RMA section 74(1)(ea)

¹² RMA section 75(3)(a)

	<ul style="list-style-type: none"> • Protect the natural features and natural landscapes (including seascapes) from inappropriate subdivision, use, and development. • Recognise the need for public open space within and adjacent to the coastal marine area, for public use and appreciation including active and passive recreation and provide for such public open space. • Recognise the public expectation of and need for walking access to and along the coast that is practical, free of charge and safe for pedestrian use, and maintain and enhance public walking access to, along and adjacent to the coastal marine area. • Identify areas that are potentially affected by coastal hazards (including tsunami), giving priority to the identification of areas at high risk of being affected. • Subdivision, use, and development in areas potentially affected by coastal hazards over at least the next 100 years avoids increasing the risk of social, environmental and economic harm from coastal hazards. • Protection, restoration or enhancement of natural defences that protect coastal land uses, or sites of significant biodiversity, cultural or historic heritage or geological value, from coastal hazards. • Seek that a range of options should be assessed in areas of significant existing development likely to be affected by coastal hazards. <p>Objective 5 of the <i>NZCPS 2010</i> seeks to ensure that coastal hazard risks taking account of climate change, are managed by:</p> <ul style="list-style-type: none"> • locating new development away from areas prone to such risks; • considering responses, including managed retreat, for existing development in this situation; and • protecting or restoring natural defences to coastal hazards. <p>Policy 24 seeks those areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) are identified, giving priority to the identification of areas at high risk of being affected.</p> <p>Policy 25 seeks that subdivision, use, and development in areas potentially affected by coastal hazards over at least the next 100 years avoids increasing the risk of social, environmental and economic harm from coastal hazards; redevelopment, or change in land use is encouraged where that would reduce the risk of adverse effects from coastal hazards, including managed retreat by relocation or removal of existing structures or their abandonment. The Policy also encourages the location of infrastructure away from areas of hazard risk where practicable; and discourages hard protection structures and promotes the use of alternatives to them, including natural defences.</p>
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	<p>Policy 26 seeks to provide for, where appropriate, the protection, restoration or enhancement of natural defences that protect coastal land uses, or sites of significant biodiversity, cultural or historic heritage or geological value, from coastal hazards.</p> <p>Policy 27 sets out a range of options that should be assessed in areas of significant existing development likely to be affected by coastal hazards.</p>
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1.6.3 National Environmental Standards

A territorial authority must prepare and change its district plan in accordance with any regulations.¹³ The following National Environmental Standards are regulations and are of relevance to the Coastal topic:

National environment standard	Relevance
Resource Management (National Environmental Standard for Plantation Forestry) Regulations 2018	<p>The National Environment Standard for Plantation Forestry 2017 permits forestry to be planted across the district and consent for this activity except that under clause 6 (1) a rule in a plan may be more stringent than these regulations if the rule gives effect to—</p> <p>(a) an objective developed to give effect to the National Policy Statement for Freshwater Management:</p> <p>(b) any of policies 11, 13, 15, and 22 of the New Zealand Coastal Policy Statement 2010.</p> <p>Policy 13 of the NZCPS relates to the preservation of natural character and therefore more stringent rules can be applied to areas with outstanding, very high and high natural character.</p>

1.6.4 New Zealand National Planning Standards

A territorial authority must prepare and change its district plan in accordance with any regulations.¹⁴ The National Planning Standards (NZNPS) require that all District Plans must include a Coastal chapter if relevant to the district.¹⁵ This chapter must be included under the General District-Wide Matters section of the District Plan, in Part 2: District Wide Matters.¹⁶

As the Timaru District has a coastline, a Coastal chapter should be provided that: ¹⁷

- a) Sets out the approach to managing the coastal environment and giving effect to the NZCPS;

¹³ RMA section 74(1)(f)

¹⁴ RMA section 74(1)(ea)

¹⁵ National Planning Standards, District Plan Structure Standard, Mandatory direction 3.

¹⁶ National Planning Standards, District Plan Structure Standard, Table 4

¹⁷ National Planning Standards, District-wide Matters Standard, Mandatory direction 28

- b) Sets out provisions for implementing the local authority’s functions and duties in relation to the coastal environment, including coastal hazards; and
- c) Provides cross-references to any other specific coastal provisions that may be located within other chapters.

The NZNPS also state that *“if provisions relating to natural hazards are addressed (except coastal hazards), they must be located in the Natural Hazards chapter.”*¹⁸ The National Planning Standards require that all District Plans must include coastal hazards in the Coastal Environment chapter, and these are cross-referenced to the Natural Hazards chapter. This approach has been confirmed, in writing, by the MfE. A territorial authority must prepare and change its district plan in accordance with any regulations. Therefore, it is proposed that coastal hazards that are identified as warranting management are identified on the Planning Maps using lines and overlays.

The NZNPS sets out the spatial layers for district plans (Table 18). Of specific relevance to the Coastal Environment chapter, Table 18 states that an overlay spatially identifies distinctive values, risks or other factors which require management in a different manner from underlying zone provisions, and that overlays are likely to address matters covered in district-wide chapters. Table 20 (Symbol representation) specifies a mapping standard for the coastal environment overlay (see below).


Symbol name	Symbol	Description	
Coastal environment overlay		Polygon Angle: 90.00 Line width: 1 pts	Line separation: 80 pts RGB 28, 103, 148 Outline width: 2 pts

Figure 1: Excerpt of the Coastal environment overlay mapping standard

The Coastal environment overlay should therefore be identified on the Planning Maps using an overlay titled ‘Coastal environment overlay’ in accordance with the above mapping standard with related provisions set out in the Coastal chapter.

The following terms are defined in the NZNPS and are of particular relevance to the Coastal chapter.

- Building
- Coastal water
- Natural hazard
- Raft
- Reclamation

1.6.5 Canterbury Regional Policy Statement 2013

A district plan must give effect to any regional policy statement.¹⁹ Chapter 8 of the CRPS addresses matters relating to the Coastal Environment and outlines the following issues:

- There is a lack of knowledge about the natural processes taking place in the coastal environment (particularly the coastal marine area), and the values associated with the coastal environment. Gaining such information comes at a significant cost and will take time to obtain.²⁰

¹⁸ National Planning Standards, District-wide Matters Standard, Mandatory Direction 10

¹⁹ RMA section 75(3)(c)

²⁰ CRPS Issue 8.1.1

- Administrative and jurisdictional boundaries in the coastal environment can hinder the integrated management of the coastal environment.²¹
- Activities in the coastal environment can have adverse effects on the natural character of the coastal environment and other natural, cultural, amenity, ecological, recreational and historic heritage values.²²
- Regionally significant infrastructure and other commercial maritime facilities often require a location in the coastal environment, and their operation and development can be adversely affected by other activities.²³
- Point and non-point discharges of contaminants entering the coastal marine area can cause adverse effects on coastal water quality and the associated values of the coastal environment.²⁴
- There is a need to assess the effects of climate change, and coastal hazards such as coastal erosion, on the coastal environment, and develop responses where human assets and natural values are threatened by such coastal hazards.²⁵

Related objectives seek to:

- Increase knowledge of the coastal environment and its resources;²⁶
- Provide for appropriate activities in the coastal environment;²⁷
- Ensure that subdivision, use or development in the coastal environment does not adversely affect the efficient development and use of regionally significant infrastructure and other commercial maritime activities;²⁸
- Preserve and protect the natural character of the coastal environment from inappropriate subdivision, use and development;²⁹
- Restore or enhance the natural, ecological, cultural, amenity, recreational and historic heritage values of the coastal environment;³⁰ and
- Protect coastal water quality and associated values of the coastal environment from significant adverse effects of point and non-point discharge of contaminants and enhance coastal water quality where it has been degraded.³¹

Supporting policies in Chapter 8 of the CRPS seek to:

- improve knowledge and understanding of the coastal environment, develop efficient means of gathering information, use best practice methodologies for assessing values and promoting collaboration and integrating information gathering between local authorities and other appropriate agencies³².
- provide for the integrated management of natural and physical resources and activities in the coastal environment, co-ordinated management or control of activities within the coastal

²¹ CRPS Issue 8.1.2

²² CRPS Issue 8.1.3

²³ CRPS Issue 8.1.4

²⁴ CRPS Issue 8.1.6

²⁵ CRPS Issue 8.1.7

²⁶ CRPS Objective 8.2.1

²⁷ CRPS Objective 8.2.2

²⁸ CRPS Objective 8.2.3

²⁹ CRPS Objective 8.2.4

³⁰ CRPS Objective 8.2.4

³¹ CRPS Objective 8.2.6

³² CRPS Policy 8.3.1

environment and work collaboratively with other bodies and agencies with responsibilities and functions relevant to resource management³³

- preserve and restore the natural character of the coastal environment by protecting outstanding natural features and landscapes including seascapes from inappropriate occupation, subdivision, use and development; protecting and enhancing indigenous ecosystems and associated ecological processes; promoting integrated management of activities that affect natural character, avoiding new development adjacent to the coastal marine area that will compromise areas of high natural character; and imposing or reviewing restoration or rehabilitation conditions on resource consents and designations³⁴.
- maintain and enhance public and Ngāi Tahu access to and along the coastal marine area³⁵.
- provide for efficient and effective development, operation, maintenance and upgrade of regionally significant infrastructure³⁶.

The CRPS provides directions for the Council that are relevant to the Coastal chapter. The table below sets out the way in which the proposed District Plan has given effect to these directions.

CRPS Method	Manner addressed in proposed District Plan
Set out objectives and policies and may include methods in district plans to preserve the natural character of the coastal environment and protect it from inappropriate subdivision, use and development.	Objectives, policies and rules that specifically address the preservation of natural character and management of activities.
Set out objectives and policies and may include methods in district plans to maintain and enhance appropriate public access to the coastal marine area.	Objectives, policies and rules that specifically address public access in the Public Access chapter.
<p>Work together with government agencies and land occupiers or owners and government agencies to:</p> <ul style="list-style-type: none"> • advocate for and promote actions to provide or enhance appropriate access to and along the coastal marine area; and • ensure that there are bylaws, physical barriers or other measures in place to control the entry to or passage along the parts of the coastal marine area that have high values, and where they need protection from particular types of public access. <p>In particular, this may include provisions in district plans, esplanade and other reserves, covenants, bylaws, management agreements, and the construction and maintenance of physical barriers or other measures that will manage access.</p>	<p>Objectives, policies and rules that specifically address public access.</p> <p>Although much of this method will be addressed outside the District Plan.</p>

³³ CRPS Policy 8.3.2

³⁴ CRPS Policy 8.3.4

³⁵ CRPS Policy 8.3.5

³⁶ CRPS Policy 8.3.6

CRPS Method	Manner addressed in proposed District Plan
<p>Set out objectives and policies, and may include methods in district plans that:</p> <ul style="list-style-type: none"> recognise that regionally significant infrastructure needs to be able to operate and develop in an efficient and effective manner in the coastal environment. avoid land-uses that have reverse sensitivity effects on regionally significant infrastructure in the coastal environment. 	<p>Objectives, policies and rules that provide for regionally significant infrastructure in the coastal environment whilst managing the adverse effects of and on other activities.</p>
<p>Outside of greater Christchurch: Set out objectives and policies, and may include methods in district plans, to avoid new subdivision, use and development that does not meet the criteria set out in Policy 11.3.1 clauses (1) to (5) for known high hazard areas excluding those areas subject to coastal erosion within the next 100 years and within the beds of lakes and rivers.</p>	<p>The high hazard overlay is extensive and covers most of the coastal environment. However, there is a policy to manage tsunami risk but no rules as an event with low probability, but high potential impact cannot be easily addressed through land use planning and may be better addressed through measures put in place by emergency management groups such as Civil Defence. These include education, warning systems and emergency preparedness.</p>
<p>Work together to investigate and define potential high hazard areas where information is uncertain or insufficient.</p>	<p>TDC has worked with ECan to define the High Hazard overlay and develop appropriate objectives, policies and rules to strictly control development in this overlay.</p>
<p>Set out objectives and policies and may include methods in district plans to ensure that new critical infrastructure is located outside known high hazard areas, unless there is no reasonable alternative.</p>	<p>There is a policy that seeks to avoid locating critical infrastructure in areas subject to natural hazards unless it can be designed to maintain its integrity and function during and after a natural hazard event.</p> <p>Critical infrastructure is non-complying in the high hazard overlay.</p>
<p>Where critical infrastructure is located in high hazard areas, encourage the provider to ensure that it will be able to be maintained and reinstated, if necessary, within a reasonable timeframe.</p>	<p>Policy included to manage critical infrastructure in high hazard areas.</p>
<p>Set out objectives and policies and may include methods in regional and district plans to ensure new hazard mitigation works will only be undertaken in accordance with the provisions of Policy 11.3.7.</p>	<p>A policy is proposed that addresses this matter.</p>
<p>When setting out objectives, policies or methods in regional and district plans, take into account the current projections on the effects of climate change.</p>	<p>This is taken into account when considering risks from coastal hazards.</p>

Chapter 8 of the CRPS also addresses matters relating to public access to and along the CMA. These matters are addressed in the Section 32 report that deals with the Public Access topic.

The CRPS contains definitions of the following terms that are relevant to the Coastal topic:

Term	Definition
Coastal environment	The extent and characteristics of the coastal environment is defined in Policy 1 of the New Zealand Coastal Policy Statement (2010)
Regionally significant infrastructure	<p>Regionally significant infrastructure is:</p> <ol style="list-style-type: none"> 1. Strategic land transport network and arterial roads 2. Timaru Airport 3. Port of Timaru 4. Commercial maritime facilities at Kaikōura 5. Telecommunication facilities 6. National, regional and local renewable electricity generation activities of any scale 7. The electricity transmission network 8. Sewage collection, treatment and disposal networks 9. Community land drainage infrastructure 10. Community potable water systems 11. Established community-scale irrigation and stock water infrastructure 12. Transport hubs 13. Bulk fuel supply infrastructure including terminals, wharf lines and 14. Electricity distribution network 15. Infrastructure defined as 'strategic infrastructure' in this regional policy statement. <p>Note: For the avoidance of doubt, this infrastructure is also referred to as 'infrastructure that is regionally significant'.</p>

1.6.6 Canterbury Regional Coastal Environment Plan

A district plan must not be inconsistent with a regional plan.³⁷ The Regional Policy Statement recognises that a Regional Coastal Plan is mandatory, but states that Environment Canterbury will prepare a Canterbury Regional Coastal Environment Plan (CRCEP) because it provides for integration of resource management issues across the land/water interface of the coast.

The CRCEP contains the following description of the Canterbury Bight and Timaru coastlines and identifies issues that are specific to each area.

The Canterbury Bight

Description

- The shoreline of the Bight is largely a narrow sand and gravel beach with the seabed shelving steeply off the beach.
- The shoreline of the Bight is erosion prone, often receding at a rate between 0.5 to 1.0 metres a year.
- The mouths of the braided rivers and their coastal lagoons provide important habitats for indigenous birds, fish, invertebrates and plants.
- The chain of coastal lagoons and wetlands are important for migratory birds.

³⁷ RMA section 75(4)(b)

- River mouth areas have small holiday settlements, such as those of Rakaia Huts, Rangitata Reserve, and Milford.
- Offshore waters are commercial fishing grounds.

Issues

- Coastal erosion, leading to the loss of agricultural land, threats to some holiday settlements, and a reduction of coastal lagoons and wetlands.
- Water quality, with some areas such as the Opihi River Mouths having water quality that is at times unsuitable for swimming or seafood gathering.
- The need to artificially open some river mouth lagoons to avoid flooding, allow fish migration or to improve water quality.
- Limited public access to some parts of the coast.
- Modification of natural processes, including sediment supply to the coast, modification of dune processes, and a reduction in river flows leading to increased frequency and duration of river mouth closures.
- Reclamation and drainage of coastal wetlands and a reduction in water quality and ecosystem integrity of coastal lakes, lagoons and estuaries.

Timaru

Description

- Exposed stretch of coastline adjacent to Timaru City, subject to erosion and strong long-shore sediment transport processes, or drift.
- Coastal Lagoons such as Washdyke are important wildlife areas.
- The coastal reefs around Smithfield, Dashing Rocks and Patiti are important as marine habitats and for mahinga kai, wahi tapu and other Wāhi taonga.
- Caroline Bay is a significant recreational resource for the area.
- The Port of Timaru is an important commercial port for the region.

Issues

- Disposal of sewage into the sea from the Timaru urban area. Water quality is also affected by activities associated with the Port, and by urban runoff.
- Erosion at Washdyke threatens the future of the coastal lagoon as well as transport links and industrial development.
- The effects on coastal processes from the existence of the Port of Timaru and its operations and development. In particular the effects on long-shore drift and land accretion and erosion of its breakwaters and dredging.
- The need to provide for the operations and development of the Port of Timaru.
- Heavy use of the reef areas around Timaru City for food gathering.
- Development of Caroline Bay for recreational purposes.

The CRCEP contains the following objectives to address the identified issues:

- Protect, and where appropriate enhance, the identified areas, sites and habitats of high natural, physical, heritage or cultural value³⁸.
- Enable people to undertake commercial and recreational activities in the coastal environment while protecting regionally significant network utility assets and commercial ports from activities that would adversely affect their efficiency and effectiveness; and

³⁸ Objective 6. 1

avoiding, remedying or mitigating the adverse effects of those activities on the natural character of the coastal environment³⁹.

These objectives are supported by policies that seek to:

- ensure that the adverse effects of subdivision, use and development of land in the coastal environment landward of the Coastal Marine Area, on the identified values of Areas of Significant Natural Value and on the identified values of areas of high natural, physical, heritage, or cultural value, are avoided, remedied or mitigated.
- encourage the restoration or rehabilitation of areas or sites within the coastal environment

Chapter 9: Coastal Hazards

The objective seeks to minimise the need for hazard protection works and avoid or mitigate the actual or potential effects of coastal hazards by locating use and development away from areas that are subject to coastal erosion and sea water inundation, and avoid, remedy or mitigate significant adverse effects on the environment as a result of measures used to manage coastal hazards⁴⁰.

Policy 9.1 seeks to:

- locate new habitable buildings away from areas of the coastal environment that are, or have the potential to be, subject to sea water inundation or coastal erosion
- ensure that any new development in the coastal environment should be designed or located in such a way that the need for coastal protection works, now and in the future, is minimised.
- provide for the continued use and protection of essential infrastructure and services, where no reasonable alternative exists, in areas subject to coastal hazards, provided adverse effects on the coastal environment are avoided, remedied or mitigated.
- only consider new coastal protection works for existing use and development where they represent the best practical option for natural hazard mitigation or avoidance, and adverse effects can be avoided, remedied or mitigated.
- protect natural features that buffer the effects of coastal hazards.
- avoid, remedy or mitigate any significant adverse effects from the location, type and design of coastal hazard damage minimisation measures.
- remedy or mitigate any significant adverse effects from new coastal protection works or remove redundant structures, to assist in restoration and rehabilitation of the natural character of the areas concerned.

³⁹ Objective 6.3

⁴⁰ Objective 9.1

1.5.7 Other relevant documents

The other relevant documents for this topic include:

Document	Relevance
Iwi Management Plan of Kāti Huirapa	General relevance to the whole Plan and specific relevance to Tāngata whenua chapters.
Te Whakatau Kaupapa Ngai Tahu Resource Management Strategy for the Canterbury Region	General relevance to the whole Plan.
Local Government Act 2002	<p>The Council must have particular regard to the contribution that the following core services make to its communities: the avoidance or mitigation of natural hazards.</p> <p>The Council must, as part of its long-term plan, prepare and adopt an infrastructure strategy for a period of at least 30 consecutive financial years. The infrastructure strategy must outline how the local authority intends to manage its infrastructure assets, including taking into account the need to provide for the resilience of infrastructure assets by identifying and managing risks relating to natural hazards and by making appropriate financial provision for those risks.</p>

2 Approach to Evaluation

Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

The proposed provisions relevant to the Coastal Environment Chapter have been assessed in accordance with the following issues:

1. Issue 1 - The need to identify the qualities that contribute to the natural character of the terrestrial part of Timaru's coastal environment.
2. Issue 2 – The need to manage adverse effects of land use, development and subdivision (including cumulative effects), on the coastal environment including the potential loss of, or adverse effects on, the coastal environment's natural character and other qualities.
3. Issue 3 – The need to recognise the importance of the coastal environment to Ngāi Tahu.

4. Issue 4 – The need to protect people, buildings and structures from risks associated with identified coastal hazards.

2.1 Scale and significance

The table below sets out the scale and significance of managing the coastal environment of the district in terms of Council’s statutory obligations, who may be affected by any proposed changes to the management regime, the type of effects that may occur and where in the District is mostly likely to be affected by the proposed changes to the District Plan. This will inform the nature and extent of the analysis of the proposed changes to the coastal environment provisions. For example, proposed provisions that will result in an overall high level of scale and significance will require a more in-depth analysis of proposed objectives, policies and rules including, potentially, an economic analysis, compared to changes that will have a low-level significance.

<p>Issues:</p> <p>The need to identify the qualities that contribute to the natural character of the terrestrial part of Timaru’s coastal environment.</p> <p>The need to manage adverse effects of land use, development and subdivision (including cumulative effects), on the coastal environment including the potential loss of, or adverse effects on, the coastal environment’s natural character.</p> <p>The need to recognise the importance of the coastal environment to Ngāi Tahu.</p> <p>The need to protect people, buildings and structures from risks associated with identified coastal hazards.</p>		
Reasons for change in policy	<p>District Plan Review.</p> <p>Approach in National Planning Standards regarding need to identify the Coastal environment overlay and addresses coastal hazards in the CE chapter.</p> <p>Giving effect to the NZCPS 2010. Having regard to the efficient use and development of natural and physical resources; the maintenance and enhancement of amenity values; and the maintenance and enhancement of the quality of the environment in the RMA.</p> <p>Minimizing the risk to human life and property from coastal inundation and erosion.</p>	High
Relevant Statutory Considerations / Drivers	<p>RMA Parts 6, 7 and 31</p> <p>RPS Chapters 5 and 8</p> <p>NZCPS</p> <p>Regional Coastal Plan</p>	Medium

Degree of shift from status quo required	A significant change to give effect to the zoning approach in the NZNPS and to introduce new rules to avoid and minimize risks from natural hazards on human life and property. More lenient rules regarding small scale structures in areas with high natural character.	High
Who and how many will be affected?	This is likely to be limited to the Council, landowners and hut owners.	Medium/low
Degree of impact on, or interest from iwi / Maori	There are known sites of significance to Māori in the coastal environment. These will be protected and managed through a separate chapter, although some protection will be provided by the rules that control buildings, structures and earthworks in the coastal environment.	Low
When will affects occur?	Effects will occur on an on-going basis if development and activities are not adequately controlled especially with regard to natural hazards and areas with high natural character.	Medium
Geographic scale of impacts / issue	The coastal environment is a narrow strip of land that extends the full length of the district. It contains two hut settlements, the township of Timaru, farmland and industrial activities.	Low
Type of effect(s)	Ability to reconstruct buildings that have been destroyed by a natural hazard in the same location. Limited ability to construct any buildings including those related to farming within the coastal environment. Limited ability to use and protect natural coastal hazard defences in preference to hard protection structures.	Medium/low
Degree of policy risk, implementation risk, or uncertainty	The operative District Plan contains the Rural 3 Zone that covers the coastal environment and applies relatively stringent rules to development. The proposed policy framework reflects this existing approach.	Low
Overall Assessment of Scale and Significance		Medium/Low

2.2 Approach to managing the Coastal Environment

As set out above, the Council has an obligation to manage the coastal environment to preserve its natural character and protect it from inappropriate subdivision, use and development under the RMA and the NZCPS.

The National Planning Standards require the Council to identify the coastal environment as an overlay. The Coastal Environment chapter must:

- a. set out the approach to managing the coastal environment and giving effect to the NZCPS.
- b. set out provisions for implementing the local authorities functions and duties in relation to the coastal environment, including coastal hazards.
- c. provides cross-references to any other specific coastal provisions that may be located within other chapters.

No areas of outstanding coastal natural character were identified by the Timaru District Landscape and Coastal Study⁴¹. While the Timaru Coastal Erosion Assessment⁴² and Timaru District Coastal Hazard Assessment⁴³ has identified areas at high risk from coastal hazards.

The coastal environment only contains a limited number of activities; these being mainly limited to rural activities and associated buildings/structures, scattered dwellings and hut settlements outside of the settlement of Timaru. It is unclear whether the coastal environment is valued by the community as there is limited public access, but the amenity that contributes to perceived public enjoyment needs to be maintained.

It is known to contain several sites of significance to mana whenua and access to the coastal environment for mahika kia and other cultural and spiritual reasons is of huge importance to mana whenua.

It is therefore proposed to establish a policy framework that:

- seeks to identify and preserve the natural character qualities of the coastal environment and protect these from inappropriate subdivision, use and development; and;
- enable the restoration or rehabilitation of the natural character of the coastal environment.

The policies seek to differentiate between the qualities of the high natural character areas and other areas of natural character, recognising that the areas with high natural character (HNC) tend to be less modified with a lack of built structures. The policies also seek to recognise and maintain Kāti Huirapa's relationship with the coastal environment.

Coastal hazards are proposed to be identified and managed according to the level of risk: the plan identifies coastal inundation and erosion areas, with more stringent rules applying in the erosion areas to recognise the greater risk to human life and property in this overlay. Provision is made for small buildings or for buildings that are not natural hazard sensitive (e.g., non-habitable buildings). The provisions also recognise that within existing urban areas infrastructure and assets are already there and the community has already accepted a higher level of risk. For regionally significant infrastructure, the plan recognises that the risk from maintenance and upgrade activities is lower than for establishing entirely new infrastructure in areas subject to natural hazards. Recognition is also provided for operational and functional

⁴¹ Boffa Miskell Ltd, June 2020, Timaru District Landscape and Coastal Study. <https://www.timaru.govt.nz/pdp-supporting-info>

⁴² Jacobs, Timaru Coastal Erosion Assessment Report <https://www.timaru.govt.nz/pdp-supporting-info>

⁴³ Timaru District Coastal Hazard Assessment NIWA 2020. <https://www.timaru.govt.nz/pdp-supporting-info>

needs and whether the infrastructure can be able to be maintained and reinstated, if necessary, within a reasonable timeframe.

The following are proposed to be permitted activities:

- Amenity planting, horticultural planting and plantation forestry outside of the CHNC overlay;
- Planting of trees and/or vegetation for conservation, restoration and hazard mitigation works;
- Farming outside of the CHNC overlay;
- Buildings and structures that are small or are not natural hazard sensitive activities, or which meet specified permitted activity standards within natural hazard overlays;
- Earthworks outside of the CHNC overlay, or inside the CHNC overlay subject to permitted activity standards;
- The maintenance and upgrade of existing regionally significant infrastructure, subject to standards;
- New regionally significant infrastructure subject to standards outside of the CHNC overlay;
- Quarrying and mining are non-complying.

The Coastal Environment chapter does not address public access, ONFL's, historic heritage, and ecosystems and indigenous biodiversity.

2.3 Current District Plan approach

The approach of the Operative District Plan is outlined below. TDC staff have provided the input into how the current provisions are set out and how they are applied.

Issues with the Operative District Plan approach

Section 1.4 of this report outlines the Operative District Plan provisions. Several issues identified with these are:

Coastal environment

- Rural 3 zone needs to give effect to the NZCPS 2010.
- Need rule framework to direct development to be compatible with the natural character of the coastal environment.
- Need to establish a framework that directs management of vegetation clearance, grazing, structures and exotic plantings in river and coastal margins.
- Advocating and promoting the maintenance and enhancement of the natural functioning of coastal waters.
- Lack of grazing and cultivation provisions in river or coastal margins.
- Buildings within 20 metres of rivers or coastal margins only picked up through building consent process.
- It is not apparent that the District Plan considers the likely impact of coastal processes and climate change so as not to compromise the ability of future generations to have access to public open space.
- Need to identify the coastal environment boundary.
- Need to identify natural character areas, in particular for rivers and within the coastal environment.

Natural hazards

- Natural hazard information that is not 100% exact (i.e. filled sites) or collated by Environment Canterbury is not shared with the public.

- Natural hazard information needs to be reviewed to ensure up-to-date data is on hazard register.
 - It is unclear if the District Plan rules are sufficient to avoid development in areas where mitigation (i.e., finished floor levels) is not appropriate.
 - District Plan refers to ‘hazard prone locations’ rather than Canterbury’s Regional Policy Statement ‘high hazard areas’ which is specifically in relation to a 1 in 500-year flood event. Terminology of hazard information different between ECan and Council.
 - Hazard prone locations are not shown on District Plan maps. If don’t have a line on a map or a way to identify these in the District Plan, how do you manage the hazard?
 - Dual resource consent requirements with ECan regarding land use consent for development within coastal hazard areas, which may be duplicative
- These issues and the current legislative requirements have driven the following high-level changes proposed.

2.3 High Level Changes proposed

Operative Plan	Proposed Plan
The planning maps in the Operative Plan identify 100yr coastal erosion line and a coastal inundation line.	Map: erosion and inundation areas as overlays.
Rural 3 zone and Natural Hazard chapter.	Map: coastal environment overlay, hazard overlays, CHNC overlay.
Objectives and policies that seek to protect and enhance the ecological functioning, natural character and integrity of the coast from inappropriate subdivision and development. A policy that seeks to avoid, remedy or mitigate adverse effects on natural areas containing the coastal environment.	<p>Objectives and policies that identify areas with CHNC. Preserve qualities and differences between areas with CHNC and other areas with natural character and areas with no natural character (e.g., urban).</p> <p>Maintain and/or enhance the qualities that contribute to the public’s enjoyment of, and ability to interact with the coastal environment.</p> <p>Include provisions that address Ngāi Tahu’s relationship to the coast, identify coastal hazards, apply a different policy approach to managing activities in areas subject to coastal hazards, support natural features and buffers for coastal hazard management.</p>
Permitted	
<p>The protection and/or enhancement of indigenous vegetation and habitats of indigenous fauna.</p> <p>Clearance, disturbance and trimming of vegetation which is not significant indigenous vegetation or significant habitats of indigenous fauna, or significant trees.</p> <p>Minor trimming or disturbance (i.e., the removal of branches from trees/shrubs and the removal of seedlings/saplings) of significant indigenous</p>	Addressed in ecosystem and indigenous vegetation chapter.

<p>vegetation or significant habitats of indigenous fauna within 5 metres of existing fences, existing stock access tracks, state highways, public roads, utility services, public utilities, radio communication facilities and telecommunication facilities.</p> <p>Trimming and removal of significant indigenous vegetation which is necessary for the maintenance of existing transmission lines and that this activity shall not be subject to compliance with the performance standards.</p>	
<p>Walking tracks, pedestrian bridges, board walks and related minor structures that are necessary for those tracks.</p>	<p>Are not specifically provided for in the Coastal Environment chapter but enabled in underlying zone.</p>
<p>Farming (other than factory farming and outdoor non-intensive pig farming) including fencing, but not including the farming of wetlands.</p>	<p>Retained.</p>
<p>Home occupations and home stays in existing household units.</p>	<p>Will be addressed in the underlying zone provisions.</p>
<p>Maintenance of existing public roads and bridges, vehicle access tracks and stock access tracks.</p>	<p>Will be addressed in Transport chapter.</p>
<p>Maintenance and minor upgrading of existing utility services; and the establishment or upgrading of utility services which are covered by the Definition of Utility Services (1), (2) or (5) in Part D7 of the Plan not within areas of significant indigenous vegetation or significant habitats of indigenous fauna or within active beach systems.</p> <p>Maintenance and minor upgrading of existing public utilities, telecommunication facilities and radio communication facilities.</p>	<p>Will be addressed in Utility chapter.</p>
<p>Helicopter landing sites for the purpose of servicing telecommunication and radio communication facilities, and public utilities outside of areas of significant indigenous vegetation or significant habitats of indigenous fauna.</p>	<p>Will be addressed in Noise chapter.</p>
<p>Shelterbelts and harvesting of trees in shelter-belts, woodlots, and forestry.</p>	<p>Rules that permit the planting of indigenous species of trees and/or vegetation for conservation, restoration or enhancement purposes.</p>

Drainage works other than those affecting wetlands.	This is an ECan matter.
Prospecting and exploration (not involving excavation or dredging) as defined in the Crown Minerals Act 1991, which does not disturb significant indigenous vegetation and significant habitats of indigenous fauna.	This is addressed in the underlying Rural chapter.
Extraction of shingle, gravel and sand materials that is permitted by a rule in a Regional Plan or which has been granted resource consent from the Canterbury Regional Council under the Resource Management Act 1991.	Extraction is managed in the coastal environment chapter as ECan and TDC address different matters, with TDC having a focus on preserving natural character.
Land-based recreational activities not including buildings or structures, and not including use of aircraft or motorised vehicles in wetlands or in areas of significant riverbed and coastline habitat during bird breeding seasons.	Addressed in the underlying Rural Zone.
Those activities provided for in the General Rules as permitted activities other than filling of sites in or within 50 metres of wetlands.	Some matters may be addressed in District Wide chapters and cross-referenced to CE chapter. Also note that the NES-FW addresses wetlands.
Utility services not within significant indigenous vegetation and significant habitats of indigenous fauna.	Addressed in Infrastructure chapter.
Discretionary	
Any programme of restoration or rehabilitation to enhance the amenity, ecological, or landscape values of an area which involves the excavation or accumulation of soil or other materials. Council shall restrict its discretion to the environmental effects associated with the matters in Policy 1.1.7 and Policy 1.3.3.	Earthwork rules to limit scale and extent given CHNC and coastal hazards.
Vehicle tracks and stock access tracks through rivers including streams.	This is an ECan matter.
Utility services within significant indigenous vegetation and significant habitats of indigenous fauna. Public utilities. Telecommunication facilities and radio communication facilities. Council shall restrict its discretion to potential visual effects and effects on indigenous flora and fauna in natural areas.	Addressed in the Ecosystems and Indigenous Biodiversity chapter.

Mining, quarrying, extraction of soil, rock, shingle, gravel and sand materials occurring naturally on or beneath the site not provided for as permitted activities.	Retained (non-complying).
Subdivision provided that all allotments have a minimum area of 10 hectares except for esplanade reserves for which there will be no minimum area.	Addressed in the Subdivision chapter.
Non-complying	
Clearance by any means (including burning and spraying with herbicides) of significant indigenous vegetation and significant habitats of indigenous fauna.	Addressed in Ecosystems and Indigenous Biodiversity chapter.
Drainage affecting wetlands and reclamation (or infilling) of wetlands.	This is an ECan matter.
Household units and other types of residential activities.	Permitted outside areas with CHNC. In hazard areas are subject to various standards. Will also be addressed in the underlying zone and subdivision provisions.
Farming in wetlands.	This is an ECan matter.
Coastal hazards	
<p>The objectives and policies seek to:</p> <ul style="list-style-type: none"> • avoid further non-essential development or redevelopment in the most hazard prone areas of the district, especially adjacent to rivers and the sea. There is limited provision for the reconstruction of existing household units and holiday huts, and the modification of existing dwellings to decrease the level of flood risk or damage. • actively encourage the relocation of household units from the most hazard prone locations. • limit further zoning for residential development in the most hazard prone locations. • ensure that if household units are constructed, there is no more than a 0.5% chance, in any one year, of a flood reaching the floor level. • improve knowledge of natural hazard risks, minimise risks to life and property from land subsidence, and minimise costs to the wider community from measures to reduce the exposure of individuals or particular communities. 	<p>Objectives and policies are proposed that identify hazard areas. Generally, development is sought to be avoided in high hazard areas.</p> <p>It is not proposed to include policies related to knowledge, research and public education.</p>

<ul style="list-style-type: none"> • new residential and other intensive development on sites subject to a 2.0% chance, in any one year, of flooding, are discretionary activities. <p>The Recreation 1 Zone seeks to manage new development in most of the hut settlements whilst providing for the reconstruction or modification of existing household units including holiday huts at Milford Huts.</p>	
<p>Permitted</p> <p>All household units and other residential activities constructed with a floor height such that the risk of flood waters rising to that level shall not exceed 0.5% in any year, except that this rule shall not apply to extensions of existing household units and other residential activities where the extension will not increase the total floor area by more than 20%.</p> <p>The 20% referred to above shall apply from 7 October 1995. Any subsequent extensions to existing household units shall require a resource consent and shall be required to comply with the minimum floor height.</p>	<p>Natural hazard sensitive development in high hazard areas continues to require consent. This development is generally non-complying in high hazard areas (as determined through a flood risk certificate).</p>
<p>Discretionary</p> <p>The erection of a building or structure other than in the Recreation 1 Zone or the Commercial 2A Large Format Store (Retail Park) zone on land subject to a risk of flooding which exceeds 2.0% in any year. This rule does not apply to:</p> <p>(a) The maintenance of existing buildings or structures or to the minor upgrading of existing public utilities, utility services, telecommunication facilities or radiocommunication facilities; or</p> <p>(b) Public utilities, utility services, telecommunication and radiocommunication facilities or non-habitable buildings ancillary to public utilities, utility services, telecommunication facilities and radiocommunication facilities.</p>	
<p>The reconstruction of existing household units at Milford Huts which fail to meet the timeframes specified in section 10 of the Resource Management Act (i.e., existing use rights).</p>	<p>Existing use rights apply as cannot extinguish through the district plan.</p>
<p>Non-complying</p> <p>Any residential activity with a floor height which does not meet the permitted activity standards except at Milford Huts.</p>	<p>Minimum floor levels continue to apply via a certificate approach.</p>

<p>Prohibited activities Household units (including holiday huts) and other residential activities within any area identified in the planning maps as subject to coastal inundation, except those provided for as discretionary activities in the Recreation 1 Zone at Milford Huts only.</p>	<p>The Rural 3 zone lies within the coastal inundation overlay. Residential units were not complying under the Rural 3 Zone. New rules apply to manage hazard sensitive activities such as household units in hazard areas. If standards are not met then are restricted discretionary in urban areas.</p>
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2.4 Quantification of Costs and Benefits

The level of detail of analysis in this report is low to medium. Activities within the areas with CHNC can adversely impact on the natural character values and generally need to be limited in nature and extent to protect the identified values. This means that resource consents are required for a broad range of activities, with subsequent costs. In addition, consenting information requirements can impose additional costs on applicants as specialist natural character assessments are often required. However, the cost to the environment of not appropriately managing activities in the coastal environment has the potential to be very high and the preservation of the natural character of the coastal environment and its protection from inappropriate subdivision, use and development is recognised as a matter of national importance under section 6(a) of the RMA 1991.

Likewise, activities within natural hazard areas can adversely impact on the health, safety and wellbeing of the community, as well as the integrity of buildings and structures. There is a significant cost to the District if activities are not stringently managed and generally avoided in high hazard areas.

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. It is considered that adverse effects on and degradation of natural character are difficult to quantify in monetary terms. However, the adverse effects of natural hazards can be more readily quantified in economic terms i.e. the cost of replacing a building or structure can be easily calculated. The same cannot be said for a human life. It is also noted that stringent rules already apply to most buildings in the Rural 3 and seaward of the Coastal Hazard line, therefore a detailed economic analysis has not been undertaken to assist in the quantification of benefits and costs.

2.5 Choice of Evaluation Method(s)

Given the scale and significance of the issues related to the coastal environment and the regulatory directive to identify and preserve areas with high natural character and protect people and development from the risks assisted with coastal hazards, it is proposed to assess the preferred option against the operative plan provisions (status quo) and one other, feasible and realistic option. The options will be assessed using a cost-benefit analysis, given the discussion above on costs and benefits.

2.6 Proposed objectives

This section of the report evaluates the proposed objectives as to whether they are the most appropriate to achieve the purpose of the Act.

CE-O1 Coastal natural character

The natural character of Timaru’s coastal environment is preserved and protected from inappropriate subdivision, use and development, while enabling people and communities to provide for their social, economic and cultural wellbeing and their health and safety.

CE-O2 Quality of the Coastal Environment

The quality of the coastal environment is maintained and/or enhanced, while providing for safe access in appropriate locations to ensure that the public can enjoy the coastal environment.

CE-O3 Kāti Huirapa values

The relationship of mana whenua / Kāti Huirapa with, and their cultural values, traditions and ancestral lands and waters in, the coastal environment are recognised and provided for.

CE-O4 Coastal Hazards

People, buildings and structures are protected from unacceptable risks arising from coastal hazards.

CE-O5 Natural Features and Buffers

Natural features and buffers are retained and used for coastal hazard management, in preference to natural hazard mitigation works, wherever appropriate.

CE-O6 Existing Urban Activities

Recognise that parts of the coastal environment are highly modified by existing urban activities, including the Port of Timaru, and provide for these ongoing activities.

3 Evaluation of Objectives

The following table has been used to evaluate the relevant objectives.

Category	Criteria	Comments
Relevance	Directed to addressing a resource management issue.	Achieves. The objectives address the issues raised by the efficiency and effectiveness review prepared in 2015 and the discussion documents prepared in 2016 including the need to preserve the natural character of the coastal environment and protect it from inappropriate development whilst recognising and providing for Ngai Tahu’s relationship with the coast. The Port of Timaru and other existing urban activities are expressly recognised and better provided for. The objectives also address the identification and management of the risks associated with coastal hazards.

	<p>Focused on achieving the purpose of the Act.</p>	<p>Achieves</p> <p>These objectives achieve s5 in relation to managing the use and development of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their health and safety while avoiding, remedying, or mitigating any adverse effects of activities on the environment.</p> <p>The objectives achieve s6(a) by preserving the natural character of the coastal environment and protecting it from inappropriate uses and development.</p> <p>The objectives achieve s6(e) as they recognise the relationship of Kāti Huirapa and their cultural values, traditions and ancestral lands in the coastal environment.</p> <p>The objectives achieve s6(h) by managing risks from natural hazards on development and uses in the coastal environment.</p> <p>The objectives achieve s7(c) by maintaining or enhancing the amenity values that contribute to the public’s enjoyment of the coastal environment. Natural character is often applied to a large extent of land and is derived from a number of qualities that contribute to its value. Amenity values are often directly related to, associated with or derived from natural character qualities but are experienced at a smaller, more local scale and are the human appreciation/experience of natural character.</p> <p>The Port of Timaru and other existing urban activities are expressly recognised and better provided for.</p>
	<p>Assists a council to carry out its statutory functions.</p>	<p>Achieves.</p> <p>The objectives set the framework for the policy direction in the coastal environment.</p> <p>As such, the provisions in the Plan will achieve the management of the potential adverse effects of activities and built form to minimise impacts on the natural character and amenity values of the coastal environment. It will also assist in managing potential and actual adverse effects from coastal hazards.</p>
	<p>Within scope of higher-level documents.</p>	<p>Achieves.</p> <p>The NZCPS sets the national policy direction for managing the coastal environment including the identification of areas with high natural character, the preservation of the natural character qualities and protection of these areas.</p> <p>The CRPS and Coastal Environment Plan (CEP) seek to manage development and uses in the coastal environment as well as risks arising from coastal hazards.</p> <p>It is considered that the proposed objectives are within the scope of the CRPS and CEP (the relevant higher-order documents).</p>

		The Port of Timaru, regionally significant infrastructure, and other existing urban activities are expressly recognised and better provided for consistent with the CRPS.
Feasibility	Acceptable level of uncertainty and risk.	Achieves. There is a moderate level of uncertainty and risk given the introduction of a separate coastal environment chapter. However, the provisions are not changing significantly from those in the operative plan, given that the construction of most buildings are discretionary or non-complying under the operative Plan, and this will remain the case.
	Realistically able to be achieved within council's powers, skills and resources.	Achieves. The provisions will be able to be achieved within council's powers, skills and resources.
Acceptability	Consistent with identified iwi/Māori and community outcomes.	Achieves. The feedback from the community on the discussion document identified general support for the identification and protection of areas of outstanding or high natural character in the coastal environment. One respondent sought protection to cover areas that were not necessarily outstanding or high natural character but have other natural character values. There was also general support for identifying areas of the coastal environment where natural character is degraded, and including provisions enabling restoration. Some respondents seek provisions that take into account the acceleration of natural hazards such as coastal erosion and the effects of climate change. The proposed objectives will set the framework to achieve these outcomes, except the restoration of natural character which is provided for by way of a policy.
	Will not result in unjustifiably high costs on the community or parts of the community.	Achieves. The proposed provisions do not differ significantly from those in the Operative plan. There are already quite stringent controls on development in the Rural 3 zone and this will not change significantly under the proposed framework. There is also limited development within the coastal development zone and the rules are proposed to enable farming, therefore the proposed objectives will not result in unjustifiably high costs. The Port of Timaru, regionally significant infrastructure, and other existing urban activities are expressly recognised.

4 Identification of Options

Provisions have been bundled where they are expected to work together to achieve the objectives. For efficiency, this evaluation focuses on the approach and the policies and rules which implement that approach as a package, rather than a detailed analysis of every provision.

The policies have two areas of focus:

- achieving the preservation of natural character and its protection from inappropriate subdivision, use and development, by managing activities in a comprehensive manner.
- managing the effects and risks from coastal hazards.

The Operative District Plan does not identify areas with natural character, whereas the Landscape and Coastal Natural Character Assessment identifies areas with high natural character. It is proposed to have directive policies that avoid significant adverse effects, and manage all other adverse effects of subdivision, use and development and promote opportunities to restore and rehabilitate natural character.

The proposed rules will also be focused upon managing effects on the attributes of the coastal environment and the qualities of natural character. There are a limited number of permitted activities recognising established activities and the need for small-scale buildings/structures in areas subject to hazards or the CHNC overlay. Any activity where there is the potential for significant adverse effects on identified areas with high natural character will require consent. The Operative District Plan generally limits buildings and structures in areas subject to natural hazards and they are prohibited seaward of the Coastal Hazard 1 line. The PDP identifies hazard areas and include rules to manage risks from coastal hazards. It is also noted that some hazards (e.g. tsunamis) will not be managed through the District Plan.

Option 1: Policies and rules that:

- recognise the qualities that contribute to the natural character of the terrestrial part of Timaru's coastal environment.
- avoid significant adverse effects; and avoid, remedy or mitigate all other adverse effects on the qualities that contribute to the natural character of the coastal environment.
- Recognise Kāti Huirapa values.
- identify coastal hazards and apply a risk-based management approach to use and development.

Option 2: Status quo - the coastal environment is zoned as Rural 3 Zone.

- Policies that seek to avoid, remedy or mitigate adverse effects on natural areas containing the coastal environment, prevent new residential and other intensive development including commercial and industrial development in the most hazard prone locations, and limit further zoning for residential development in most hazard prone locations.
- Buildings are generally non-complying within the Rural 3 zone and prohibited seaward of the 100yr coastal erosion line.

Option 3: Require all activities in the coastal environment to apply for resource consent.

5 Evaluation of Options

5.1 Evaluation table

OPTION 1

Policies and rules that:

- recognise the qualities that contribute to the natural character of the terrestrial part of Timaru’s coastal environment.
- avoid significant adverse effects; and avoid, remedy or mitigate all other adverse effects on the qualities that contribute to the natural character of the coastal environment.
- recognise Kāti Huirapa values.
- recognise existing urban activities and regionally significant infrastructure with a functional or operational need for a coastal environment location.

Identify coastal hazards and apply a risk-based management approach to use and development.

Benefits Environmental	Economic	Social	Cultural
<p>Environmental:</p> <ul style="list-style-type: none"> • Relies on existing available and up to date information on coastal attributes and coastal hazards. • Clearly identifies the qualities of areas with high and other natural character that are to be preserved and other areas that are existing highly modified urban environments. • Clearly identifies the coastal environment. • Enables activities to be assessed with a clear understanding of the natural character qualities to be preserved and coastal hazard risk to be avoided or mitigated. • Preserves the natural character of the coastal environment and protects it from inappropriate 	<ul style="list-style-type: none"> • Landowners have a clear understanding of natural character attributes and qualities, and coastal hazard risks. • Enables existing activities such as farming and small-scale buildings and structures outside of high hazard areas. • Avoids duplicating rules that apply in the underlying Rural Zone may minimise the risk of conflicting provisions and potentially unnecessary applications. • Enables activities that do not undermine the natural character of the coastal 	<ul style="list-style-type: none"> • The community understands what attributes have been considered to identify an area as having natural character. • Protection of the qualities that the community values and that contribute to its enjoyment of the coastal environment. • The coastal environment contributes to people’s sense of wellbeing. • Provides a place for recreational activities. • Contributes to the identify and character of the District. • Protection of property and life from coastal high hazards. • Contributes to community’s sense of safety and security. 	<ul style="list-style-type: none"> • May assist in the protection of sites of cultural significance.

<p>subdivision, use and development.</p> <ul style="list-style-type: none"> • Clearly identifies activities that can be undertaken without resource consent. • Requires resource consents for activities that have the potential to generate significant effects. • Requires resource consents for activities that have the potential to be significantly affected by coastal hazards. • Enables applications to be declined where they are inappropriate and do not protect areas with CHNC and for development at risk from coastal hazards. • Decision makers are provided with reliable information on the qualities of areas identified as having CHNC and on coastal hazards and their associated risks to undertake an assessment of the effects of a proposal. • Ensures that buildings/structures do not adversely affect people's enjoyment of the coastal environment. • Where required, technical inputs will ensure development only occurs when it has been demonstrated as appropriate. 	<p>environment, including those located within highly modified existing urban areas.</p> <ul style="list-style-type: none"> • Adjoining land increases in value due to preservation of natural character. • Tourism opportunities that may be provided by the coastal environment. • Enables the ongoing operation of the Port and other regionally significant infrastructure in natural hazard areas. 		
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<ul style="list-style-type: none"> • Activities that are appropriate and that protect and contribute to the values of the coastal environment can occur without the need for resource consent (e.g. customary activities). • May assist in protection of indigenous vegetation that contributes to natural character. 			
<p>Costs Environmental</p>	<p>Economic</p>	<p>Social</p>	<p>Cultural</p>
<ul style="list-style-type: none"> • Mapping and identification of areas with natural character and coastal hazards will not reflect the dynamic nature of the coastal environment. • Rules/standards may potentially limit some activities and development. • Potentially puts greater development and subdivision pressure on areas outside those with CHNC. 	<ul style="list-style-type: none"> • Monetary cost to the Council of undertaking comprehensive natural character and coastal hazard assessments. • Possible need for the Council to amend maps in the future as the coastline changes. • Potential loss of economic and employment opportunities due to uncertainty created by the resource consent process, as well as deterring the establishment of new activities. • Cost to the Council of processing applications and potentially requiring its own natural character and/or coastal 	<ul style="list-style-type: none"> • Inability to obtain work or develop land could force people to move away from the coastal environment and long-standing community connections. 	<ul style="list-style-type: none"> • Tāngata Whenua may not be able to undertake economic development of their land in areas with CHNC and coastal high hazard areas.

	<p>hazard assessments.</p> <ul style="list-style-type: none"> • Costs for landowners and ratepayers involved in obtaining resource consents and the possible need for specialist natural character and coastal hazard assessments. • Value of land in coastal environment may decline due to stringent controls and limits on activities. • Cost to the community of not being able to insure and/or reconstruct buildings in coastal hazard areas. • Cost to landowners of not being able to develop land within coastal high hazard areas. • Loss of visitor opportunities as facilities and accommodation cannot be built or holiday huts are removed. 		
<p>Efficiency</p>	<p>The benefits to the environment outweigh the costs, which are principally economic. Environmental benefits are greater than for Options 2 and 3 and outweigh any increase in compliance costs. Also, whilst the safety and wellbeing of the community is one aspect, it is an important one, as is the ability to decline further development in high hazard areas thus avoiding substantial investment in areas that may be inundated or lost to the sea. To enable development in such areas has implications for insuring buildings and Council liability for enabling that development.</p>		

Effectiveness	<p>The proposed provisions are considered to be the most effective means of achieving the objective(s) as together they will:</p> <ul style="list-style-type: none"> • give effect to the provisions of the NZCPS and the CRPS. • enable the Council to fulfil its statutory obligations, including s6(a), s6(e) and s7(f). • ensure that a robust process is undertaken and documented that sets out qualities for all areas of natural character. • ensure that adverse effects on CHNC areas are managed appropriately by ensuring significant effects on CHNC are avoided and effects on all other areas of natural character are avoided, remedied or mitigated and activities generally require resource consent. <p>enable the Council to effectively administer its District Plan and to monitor the outcomes of the proposed provisions in a clear and consistent manner.</p>
Strategic Direction(s) SD-O3 SD-O4	<p>This option gives effect to the strategic directions as:</p> <ul style="list-style-type: none"> • the coastal environment is identified, and its natural character values are sought to be protected. • development is sought to be avoided in the coastal high hazard area. • some development is enabled in the coastal high hazard area, and the mapping of the coastal hazard areas has taken into account climate change.
Overall Appropriateness of Option 1	<p>This is considered to be the most appropriate option as it gives effect to the CRPS and identifies areas with CHNC and natural hazards. It is proposed to manage development within them according to the level of risk to CHNC qualities and life and property.</p>

OPTION 2

Status quo - the coastal environment is zoned as Rural 3 Zone with associated objectives, policies and rules.

Benefits Environmental	Economic	Social	Cultural
<ul style="list-style-type: none"> • Requires resource consent for activities that have the potential to generate significant effects or have the potential to be significantly affected by coastal hazards. • Enables applications to be declined thus protecting areas with natural character and development from coastal hazards. 	<ul style="list-style-type: none"> • Landowners have a clear understanding of coastal hazards and associated risks. • Enables existing activities such as farming. • Enables activities that do not undermine the natural character of the coastal environment. • Adjoining land increases in value due to preservation of natural character. 	<ul style="list-style-type: none"> • Protection of the qualities that the community values and that contribute to its enjoyment of the coastal environment. • The coastal environment contributes to people's sense of wellbeing. • Provides a place for recreational activities. • Contributes to the identify and character of the District. 	<p>May assist in the protection of sites of cultural significance.</p>

<ul style="list-style-type: none"> • Enables resource consents to be assessed with a clear understanding of the coastal hazard risk to be avoided or mitigated. • Ensures that buildings/structures do not adversely affect people's enjoyment of the coastal environment. • Activities that are appropriate and that contribute to the values of the coastal environment can occur without the need for resource consent (e.g. farming). • Protects the values of the coastal environment and qualities that contribute to natural character. • Where required, technical inputs will ensure development only occurs when it has been demonstrated as appropriate. • May assist in protection of indigenous vegetation that contributes to natural character. 	<ul style="list-style-type: none"> • Tourism opportunities that may be provided by the coastal environment. 	<ul style="list-style-type: none"> • Protection of property and life from coastal hazards. • Contributes to community's sense of safety and security. 	
<p>Costs Environmental</p>	<p>Economic</p>	<p>Social</p>	<p>Cultural</p>
<ul style="list-style-type: none"> • Does not map or identify the qualities of the areas of natural character that are to be preserved, or areas 	<ul style="list-style-type: none"> • Landowners do not have a clear understanding of natural character attributes and 	<ul style="list-style-type: none"> • The community does not understand what attributes constitute natural character. • Inability to obtain work or develop land 	<ul style="list-style-type: none"> • Kāti Huirapa may not be able to undertake economic development of

<p>with high natural character.</p> <ul style="list-style-type: none"> • Does not clearly map or identify the coastal environment. • Mapping and identification of coastal hazards will not reflect the dynamic nature of the coastal environment. • Decision makers are not provided with reliable information on the qualities of areas identified as having natural character to undertake an assessment of the effects of a proposal. • Rules/standards may potentially limit some activities and development. • Difficult to assess activities with a clear understanding of the natural character qualities to be preserved. • Potentially puts greater development and subdivision pressure on areas outside the coastal environment. 	<p>qualities, meaning a case by case approach with any consent.</p> <ul style="list-style-type: none"> • Possible need for the Council to amend coastal hazard maps in the future as the coastline changes. • Potential loss of economic and employment opportunities due to uncertainty created by the resource consent process, as well as deterring the establishment of new activities. • Cost to the Council of processing applications and potentially requiring its own natural character assessments. • Higher costs for landowners and ratepayers involved in obtaining resource consents and associated time/costs/uncertainty associated with stringent activity status and the need for specialist natural character assessments. • Potential for value of land in coastal environment declines due to stringent controls and limits on activities. • Potential cost to the community of not being able to insure 	<p>could force people to move away from the coastal environment and long-standing community connections.</p>	<p>their land in areas with CHNC and that are subject to coastal hazards.</p> <ul style="list-style-type: none"> • Does not recognise or provide for the relationship of Kāti Huirapa and their culture and traditions with their ancestral lands, water, sites, wahi tapu and other taonga.
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	<p>and/or reconstruct buildings in coastal hazard areas.</p> <ul style="list-style-type: none"> Loss of visitor opportunities as facilities and accommodation cannot be built or holiday huts are removed. 		
Efficiency	There are significant environmental and economic costs associated with this option that outweigh any environmental benefits.		
Effectiveness	<p>The proposed provisions are not considered to be the most effective means of achieving the objective(s) as together they:</p> <ul style="list-style-type: none"> do not give effect to the provisions of the NZCPS and the CRPS. do not enable the Council to fulfil its statutory obligations, including s6(e) and s7(f). <p>do not identify the qualities for all areas with CHNC.</p>		
Strategic Direction(s)	<p>This option partly gives effect to the strategic directions as:</p> <ul style="list-style-type: none"> the coastal environment and its values are not identified. development is sought to be avoided in the high hazard areas. the mapping of the coastal hazard areas may not have taken into account climate change. 		
Overall Appropriateness of Option 1	<p>The operative Plan does not identify the extent of the coastal environment meaning that no specific provisions or consideration can be given to the values and qualities of this area. Neither does it identify areas with CHNC. As such, it would be difficult to give effect to the RMA to preserve natural character as there is no understanding of the level of natural character in defined areas or its qualities. Consequently, if perpetuated the status quo would not achieve the objectives.</p>		

OPTION 3

Require all activities in the coastal environment to apply for resource consent.

Benefits Environmental	Economic	Social	Cultural
<ul style="list-style-type: none"> Protects the values of the coastal environment and qualities that contribute to natural character. Preserves the natural character of the coastal environment. Enables all adverse effects of any activity to be assessed. 	<p>Adjoining land increases in value due to preservation of natural character.</p>	<ul style="list-style-type: none"> Protection of the qualities that the community values and that contribute to its enjoyment of the coastal environment. The coastal environment contributes to people's sense of wellbeing. 	<p>May assist in the protection of sites of cultural significance.</p>

<ul style="list-style-type: none"> • Enables any resource consent to be declined (if not a controlled activity). • Limits future development that will be affected by coastal hazards. • Ensures that buildings/structures do not adversely affect people's enjoyment of the coastal environment. • Protects the values of the coastal environment and qualities that contribute to natural character. • Where required, technical inputs will ensure development only occurs when it has been demonstrated as appropriate. • May assist in protection of indigenous vegetation that contributes to natural character. 		<ul style="list-style-type: none"> • Contributes to the identify and character of the District. • Protection of life and property from coastal hazards. • Contributes to community's sense of safety and security. 	
<p>Costs Environmental</p>	<p>Economic</p>	<p>Social</p>	<p>Cultural</p>
<ul style="list-style-type: none"> • Rules/standards severely limit activities and development. • Potentially puts greater development and subdivision pressure on areas outside the coastal environment. 	<ul style="list-style-type: none"> • Cost to the Council of processing applications and potentially requiring its own natural character assessments. • Significant costs to Council and landowners, essentially requiring consents 	<p>Inability to obtain work or develop land could force people to move away from the coastal environment and long-standing community connections or to abandon farmland if consents cannot be obtained to work the land.</p>	<p>Kāti Huirapa may not be able to undertake economic development of their land in areas with CHNC.</p>

	<p>to farm and potentially carry out activities that are currently permitted, if existing use rights cannot be proved.</p> <ul style="list-style-type: none"> • Potential (limited) loss of economic and employment opportunities due to uncertainty created by the resource consent process, as well as deterring new activities from establishing. • Potential for the value of land in coastal environment declines due to stringent controls and limits on activities. • Potential loss of visitor opportunities as facilities and accommodation cannot be built or holiday huts are removed. 		
Efficiency	There are significant economic costs associated with this option that outweigh any environmental benefits.		
Effectiveness	This option would achieve the desired outcome of protecting the natural character and qualities of the coastal environment by requiring all activities to be subject to a consent process. Thus, any adverse effects can be assessed and avoided, remedied or mitigated.		
Strategic Direction(s)	<p>This option partly gives effect to the strategic directions as:</p> <ul style="list-style-type: none"> • it seeks to protect the values of the coastal environment. • development is sought to be controlled in all areas subject to a coastal hazard. 		
Overall Appropriateness of Option 1	Option 3 is not considered the most appropriate way in which to achieve the objective(s) because it would be too stringent and place unnecessary constraints on landowner's ability to use their land and continue existing activities. This could generate significant costs for the Council and landowners, essentially		

	<p>requiring consents to farm and potentially carry out activities that are currently permitted, if existing use rights cannot be proved. There is the potential (limited) loss of economic and employment opportunities due to uncertainty created by the resource consent process, as well as deterring new activities from establishing.</p> <p>Whilst it would enable all adverse effects to be considered and managed, it is unnecessary in preserving natural character and managing coastal hazards and would be difficult to justify to the community.</p>
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5.2 Risk of Acting or Not Acting

It is considered that, given the guidance in the NZCPS, CRPS, the technical reports prepared and best practice, there is a low risk of acting in the manner proposed.

6 Preferred Option

This evaluation has been undertaken in accordance with Section 32 of the Act in order to identify the need, benefits and costs arising from the District Plan Review relating to the Coastal Environment Chapter provisions and the appropriateness of the current and proposed methods and rules having regard to their effectiveness and efficiency relative to other means in achieving the purpose of the Act.

The proposed approach is to have simple and directive objectives supported by clear and focussed policy statements. This policy framework sets out to identify and protect areas of CHNC and identify areas subject to coastal hazards. These policies are supported by a range of rules focussing on the activities that could threaten the values of the coastal environment and identified areas of natural character, as well as avoiding development in coastal high hazard areas and managing development in other coastal hazard areas.