

28 September 2026

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Dear Emily,

Supplementary information for submission point 81.1 at 89 Bushy Beach Road, Ōamaru.

This supplementary information is provided to the reporting planner in response to her letter of the 30th July 2026. It is intended that this supplementary information will assist the Council planner in forming her view on the suitability of the submitters land for rezoning from Rural General to General Residential and Rural Lifestyle.

Clarification

The site referred to in the submission and in this supplementary information package is known locally as 88 Bushy Beach Road as a whole, but technically, 89 Bushy Beach Road refers to the land to the northeast of Bushy Beach Road. This supplementary information package addresses the change of zoning to 89 Bushy Beach Road, as shown on the plan below (figure 1).



Figure 1: 89 Bushy Beach Road

Introduction

In their submission – point 81.1, the submitter seeks to rezone 89 Bushy Beach Road to a combination of General Residential Zone and Rural Lifestyle Zone.

Upon reflection, and in considering the layout of the structure plan that has been designed to define what future development of the land may look like, the submitter is comfortable with altering the rezoning sought to more broadly reflect the development of the land at an approximately '*rural residential zone*' level of density. We say approximately, as during the process of detailed site evaluation the submitters goals for the site have become clearer. They hope to achieve a rural residential *style* of development. This means that each site will be far larger than that anticipated by a general residential zone, and the overall density will be closer to that anticipated by the rural residential zone. The submitter instead proposes a site specific, semi-clustered style of development, where the following criteria will be met:

- Allotments will have a minimum net site area of 5000m², and the average site density across the site will be no lower than 1ha.
- No more than 26 residential dwellings can be constructed across the site subject to the structure plan.

This will allow for the clustered type of development shown on the attached structure plan. This approach allows for dwellings to be located in such a way that the special coastal character of the site can be maintained in a far more effective way than what is currently enabled through the existing 4 hectare consented subdivision of the site.

Structure Plan

The submitter proposes a structure plan, expected to be inserted into the Plan, that outlines how development will occur on the site. A potential structure plan for the site is attached as part of this supplementary information. This structure plan shows the following:

- Access to the site
- The Coastal Erosion Hazard Overlay is shown, and all building platforms are located outside of this area
- The Significant Coastal Landscape Overlay is shown, and all building platforms are located outside of this area
- Indicative recreation linkages
- Indicative access corridors
- Open drain / Overland flow path
- Existing water supply
- Existing foul sewer mains
- Indicative landscaping as informed by the landscape assessment that accompanied the previously consented subdivision consent.

This structure plan will recognise and allow for a unique and site specific rural residential form of clustered development that is both sensitive to and integrated with the special environmental values of

the site. Development of the site is intended to occur in accordance with this structure plan, which has been designed to maintain and enhance the unique ecological, landscape and amenity values of the site.

The structure plan has also considered technical needs such as roading and access, as well as three waters infrastructure requirements. The structure plan is designed to allow the creation of a loosely clustered rural residential style of development, with limited numbers of dwellings to avoid the creation of a fully suburban environment.

The structure plan shows a proposal for the loose clustering of dwelling platforms. This clustering design is the result of careful analysis of the characteristics of the site. It is recognised that the site forms a significant part of the coastal environment, and the site currently has open rural characteristics that contribute to the special landscape values of the site. Importantly however, in considering site characteristics, the site is already consented for the establishment of 10 rural allotments with a minimum site area of 4 hectares, and thus this consent forms part of the existing environment.

The site analysis undertaken, that has led to the design of this structure plan has considered existing vegetation, topography and ecological matters among others. It has been developed to ensure that landscape matters are at the forefront of the design, and the clustered approach is one of the main responses to the issue. The location of the building platforms has been carefully considered with regard to viewpoints and the impact of the siting of dwellings on the views from the coast and other public spaces. The siting of the building platforms takes into account the potential adverse effects of dwellings in their immediate and wider context, although it is noted that rules that ensure conditions can be imposed on future subdivision will be appropriate to ensure that any new dwelling sits comfortably within the landscape rather than competing with it. Rules can also be included to ensure that conditions can be imposed at subdivision stage to ensure that the character of the area is maintained. It is anticipated that these conditions would be similar to those proposed on the previously consented subdivision.

This clustering will ensure that the scale of built development on the site will be limited and will ensure that the predominant rural character of the site is retained. Furthermore, the use of a structure plan approach, in conjunction with the application of rules relating to the rural residential zone will ensure that future development will not detract from or dominate the landscape.

The submitter seeks to enhance the natural and rural character of the site through undertaking this development. Mitigation of potential adverse visual effects will occur through the use of indigenous planting, that will assist in integrating new built form into the environment.

The previous subdivision

In 2024, consent was given to allow for 10 allotments across 89 Bushy Beach Road, which is the portion of the subdivision to the north east of Bushy Beach Road.

The previous subdivision sought a fairly typical form of rural lifestyle development, based on a 4ha average, which was what was anticipated by the District Plan at the time.

This form of development, while now consented, does not reflect best practice in terms of considering the best or most efficient use of land. Instead, a form of development where dwellings are clustered, leaving the remainder of the land free from development and able to be retained for rural and conservation purposes is preferable.

It is important to recognise that any assessment on appropriateness of this proposed change to the District Plan must be considered in the context of the consented subdivision consent for the subject site.

This subdivision consent provided for 10 dwellings to be constructed within this site. Indeed, if one compares the locations of the consented building platforms consented by the previous subdivision consent, with the proposed layout shown on the structure plan, there are similarities, particularly relating to the southern half of the site.

The previous subdivision consent was granted subject to a range of conditions that were designed to mitigate against the actual and potential effects on the environment of the proposal. Among them, were included conditions designed to mitigate against potential effects on visual amenity.

The submitter is comfortable with restrictions of the sort proposed being included on any future subdivision consent. These could either be included with the structure plan or listed as separate rules, or, they could be included at subdivision consent stage via a rule in the Plan that required their consideration.

For completeness, they are included here. It is intended that these also apply to any dwellings permitted through the new structure plan.

Visual Amenity

5. Pursuant to Section 221 of the Resource Management Act 1991, the following consent notices must be registered on Lots 3 to 5, and 7 to 10:

No buildings, including farm buildings can be established within the Significant Coastal Landscape portion of the property.

6. Pursuant to Section 221 of the Resource Management Act 1991, the following consent notices must be registered on Lots 1 to 4:

A minimum planting area of 250m² is to be established within one year of commencement of building a residence on the site and within 50m of the building. This must be generally in accordance with the planting guidelines outlined in Attachment A appended to this consent.

7. Pursuant to Section 221 of the Resource Management Act 1991, the following consent notices must be registered on Lots 1 to 10:

a) The maximum building heights (above existing or modified ground level) shall be as follows:

- *Dwellings – 8m*
- *Farm and accessory buildings – 8m.*

b) The maximum floor area for farm and accessory buildings is 160m²

c) All buildings must be finished in colours that are recessive colours (brown, grey, green and black) and have a low light reflectance value (36% or less) that blends in with the pastoral rural landscape context. All dominant exterior wall cladding may include (but is not limited to):

- *Horizontal or vertical weatherboards (limited to cedar, other natural timber or linea)*
- *Board and batten*
- *Oamaru Stone or Schist (Oamaru stone is acceptable but should be treated to reduce initial brightness)*
- *Plaster where used in conjunction with feature claddings*
- *Vertical metal tray profile wall cladding to match roofing.*

d) Development (including associated with buildings and accessways) must be designed to minimize the need for earthworks, and these must be designed and rehabilitated to minimize adverse visual effects on the natural character of the landform as viewed from public viewpoints surrounding. Any retaining walls visible from beyond the lot must be screened by buildings or plantings and minimised in height to the extent practicable.

e) Where applicable, water tanks are to be coloured, sited, and buried and / or screened (by planting) to have minimal visual impact from beyond the property.

f) Access roadways and driveways are to retain a rural character with a locally appropriate gravel surface and soft edges (i.e. no kerbs). Large monumental gates and brightly illuminated entrances are not permitted, although modest alpine fence/gates to give the subdivision a sense of a premium subdivision are permitted at the Bywell Street and Bushy Beach Road vehicle crossings.

g) Where lighting is required for vehicle access safety, any lighting must be low level down lights limited to a maximum height of 1.2 metres above ground level, as required for wayfinding.

h) External Lighting (other than vehicle access safety lighting):

- *All landscape lighting must be downlighting with a hidden light source.*
- *External flood lighting (attached or unattached) onto any building is prohibited. Up lights to trees and vegetation are prohibited.*

i) Permanent extensive farm paddock fencing is to be confined to standard rural post and wire construction. Alpine fencing is permitted in the immediate vicinity of the dwelling building platforms for amenity purposes.

j) Except for plantings with a mature height less than 1.5m within 20m of a dwelling, all plantings, other than those for food production, are to be locally appropriate indigenous species as provided for in Attachment A appended to this consent.

The earlier subdivision consent also included conditions relating to archaeological assessment, earthworks and an accidental discovery protocol. It is anticipated that any future development of the site under any new rules would also be subject to such requirements.

Coastal Character and Conservation

It is important to address how subdivision, use and development in accordance with a structure plan, is appropriate in the context of the coastal environment in which the site is located.

The property is approximately 40ha in size, which at a rural residential density would allow more dwellings than that are proposed. It is suggested that in conjunction with the insertion of this structure plan into the new District Plan, that new rules are inserted limiting the total number of dwellings on the site to a maximum of 26 dwellings, allowing the clustering as shown on the structure plan, and otherwise applying the usual rural residential bulk and location standards in the District Plan to the site.

Based on the premise above, it is important to address the proposed change in light of the site's proximity to the coastal environment.

The submitters are cognisant of the importance of the immediate coastal environment to the endangered Hoiho, or Yellow Eyed Penguin and other species that occupy this unique environment, and intend to create a rural residential development on the site that does not result in any adverse impact on the ability of the penguin population to thrive on Bushy Beach and surrounds. Clearly the subject site is a special and unique place, chosen by the Hoiho and other species as an important breeding location. We all know and understand the precariousness of the position of the penguins – the iconic bird featured on New Zealand's \$5 note. Threats to the Hoiho include dogs, human disturbance, climate change, fisheries, predation and disease.

The Hoiho is the subject of a strategy 'Te Kaweka Takohaka mō te Hoiho', prepared by DOC, Ngai Tahu and other partners. That strategy is an important component of the fight to save the nationally endangered bird. This proposal is not contradictory to the goals contained in this strategy.

The structure plan has been designed in such a way that the majority of the future dwelling platforms are located in the north-western part of the site, with the remainder carefully located having regard to the topography of the site. No dwellings are proposed within the Significant Coastal Landscape overlay, with the closest dwelling platform only located as close as it is to the coast due to the fact that it is located within the existing curtilage of a dwelling site that already existed on the site, but was subsequently burnt down. The images below show the site that previously contained a rural dwelling.



Figures 2 and 3: Imagery showing dwelling previously located within DP 3459.

The New Zealand Coastal Policy Statement is of importance in considering the appropriateness of the suggested change.

New Zealand Coastal Policy Statement 2010	
Objectives / Policies	
<u>Objective 1</u> To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by: • maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature; • protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand's indigenous coastal flora and fauna; and • maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity.	The proposed inclusion of the land for modified clustered rural residential use has no detrimental effect on the coastal environment as referred to in Objective 1 of the New Zealand Coastal Policy Statement
<u>Objective 2</u> To preserve the natural character of the coastal environment and protect natural features and landscape values through: • recognising the characteristics and qualities that contribute to natural character, natural	The proposal to rezone this land has been designed to take account of the existing landscape values.

features and landscape values and their location and distribution; • identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and • encouraging restoration of the coastal environment.	
<u>Objective 3</u> To 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 by: • recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources; • promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act; • incorporating mātauranga Māori into sustainable management practices; and • recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.	The proposal supports the goals of Objective 3.
<u>Objective 4</u> To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by: • recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy; • maintaining and enhancing public walking access to and along the coastal marine area without charge, and where there are exceptional reasons that mean this is not practicable providing alternative linking access close to the coastal marine area; and • recognising the potential for coastal processes, including those likely to be affected by climate change, to restrict access to the coastal environment and the need to ensure that public access is maintained even when the coastal marine area advances inland.	The proposed rezoning will allow for the ongoing and improved public use of the coastal corridor.
<u>Objective 5</u> To ensure that coastal hazard risks taking account of climate change, are managed by:	The proposed rezoning has been carefully designed to ensure that new development is located away from areas of risk.

• 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.	
<u>Objective 6</u> To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that: • the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits; • some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities; • functionally some uses and developments can only be located on the coast or in the coastal marine area; • the coastal environment contains renewable energy resources of significant value; • the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities; • the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land; • the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and • historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.	The proposed rezoning protects coastal values, while providing for housing to be provided in a more environmentally supportive way than through the current consented subdivision and does not adversely affect the areas special native flora and fauna.
<u>Objective 7</u> To 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.	The proposal to rezone does not adversely affect the ability of New Zealand to meet its international obligations.

<u>Policy 1 Extent and characteristics of the coastal environment</u> (1) Recognise that the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities. (2) Recognise that the coastal environment includes: (a) the coastal marine area; (b) islands within the coastal marine area; (c) areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of these; (d) areas at risk from coastal hazards; (e) coastal vegetation and the habitat of indigenous coastal species including migratory birds; (f) elements and features that contribute to the natural character, landscape, visual qualities or amenity values; (g) items of cultural and historic heritage in the coastal marine area or on the coast; (h) inter-related coastal marine and terrestrial systems, including the intertidal zone; and (i) physical resources and built facilities, including infrastructure, that have modified the coastal environment.	The proposed recognises those areas of the site with special coastal characteristics, and has been designed in such a way to avoid effects on them.
<u>Policy 2 The Treaty of Waitangi, tangata whenua and Māori heritage</u> In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment: (a) recognise that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment, including places where they have lived and fished for generations; (b) involve iwi authorities or hapū on behalf of tangata whenua in the preparation of regional policy statements, and plans, by undertaking effective consultation with tangata whenua; with such consultation to be early, meaningful, and as far as	The proposed rezoning recognises the importance of the site to Tangata whenua.

practicable in accordance with tikanga Māori; (c) with the consent of tangata whenua and as far as practicable in accordance with tikanga Māori, incorporate mātauranga Māori¹ in regional policy statements, in plans, and in the consideration of applications for resource consents, notices of requirement for designation and private plan changes; (d) provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance, and Māori experts, including pūkenga², may have knowledge not otherwise available; (e) take into account any relevant iwi resource management plan and any other relevant planning document recognised by the appropriate iwi authority or hapū and lodged with the council, to the extent that its content has a bearing on resource management issues in the region or district; and (i) where appropriate incorporate references to, or material from, iwi resource management plans in regional policy statements and in plans; and (ii) consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi resource management plans; (f) provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment through such measures as: (i) bringing cultural understanding to monitoring of natural resources; (ii) providing appropriate methods for the management, maintenance and protection of the taonga of tangata whenua; (iii) having regard to regulations, rules or bylaws relating to ensuring sustainability of fisheries resources such as taiāpure, mahinga mātaihai or other non	
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commercial Māori customary fishing; and (g) in consultation and collaboration with tangata whenua, working as far as practicable in accordance with tikanga Māori, and recognising that tangata whenua have the right to choose not to identify places or values of historic, cultural or spiritual significance or special value: (i) recognise the importance of Māori cultural and heritage values through such methods as historic heritage, landscape and cultural impact assessments; and (ii) provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori, including by historic analysis and archaeological survey and the development of methods such as alert layers and predictive methodologies for identifying areas of high potential for undiscovered Māori heritage, for example coastal pā or fishing villages.	
<u>Policy 7 Strategic planning</u> (1) In preparing regional policy statements, and plans: (a) consider where, how and when to provide for future residential, rural residential, settlement, urban development and other activities in the coastal environment at a regional and district level; and (b) identify areas of the coastal environment where particular activities and forms of subdivision, use and development: (i) are inappropriate; and (ii) may be inappropriate without the consideration of effects through a resource consent application, notice of requirement for designation or Schedule 1 of the Act process; and provide protection from inappropriate subdivision, use, and development in these areas through objectives, policies and rules.	The proposed rezoning has been designed in a way that ensures it allows for future rural residential use, whilst ensuring that the development allowed through the rezoning is appropriate in its environment.

(2) Identify in regional policy statements, and plans, coastal processes, resources or values that are under threat or at significant risk from adverse cumulative effects. Include provisions in plans to manage these effects. Where practicable, in plans, set thresholds (including zones, standards or targets), or specify acceptable limits to change, to assist in determining when activities causing adverse cumulative effects are to be avoided.	
<u>Policy 13 Preservation of natural character</u> (1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development: (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; including by: (c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and (d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions. (2) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as: (a) natural elements, processes and patterns; (b) biophysical, ecological, geological and geomorphological aspects; (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; (d) the natural movement of water and sediment;	The proposed rezoning is on land that already is consented to be subdivided into four hectare allotments. The proposed rezoning will result in an improved environment, with the clustered style of rural residential development resulting in improved environmental outcomes and no negative effects on the immediate or wider coastal environment.

(e) the natural darkness of the night sky; (f) places or areas that are wild or scenic; (g) a range of natural character from pristine to modified; and (h) experiential attributes, including the sounds and smell of the sea; and their context or setting.	
<u>Policy 14 Restoration of natural character</u> Promote restoration or rehabilitation of the natural character of the coastal environment, including by: (a) identifying areas and opportunities for restoration or rehabilitation; (b) providing policies, rules and other methods directed at restoration or rehabilitation in regional policy statements, and plans; (c) where practicable, imposing or reviewing restoration or rehabilitation conditions on resource consents and designations, including for the continuation of activities; and recognising that where degraded areas of the coastal environment require restoration or rehabilitation, possible approaches include: (i) restoring indigenous habitats and ecosystems, using local genetic stock where practicable; or (ii) encouraging natural regeneration of indigenous species, recognising the need for effective weed and animal pest management; or (iii) creating or enhancing habitat for indigenous species; or (iv) rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarsh; or (v) restoring and protecting riparian and intertidal margins; or (vi) reducing or eliminating discharges of contaminants; or (vii) removing redundant structures and materials that have been assessed to have minimal heritage or amenity values and when the removal is authorised by required permits, including an archaeological authority under the Historic Places Act 1993; or (viii) restoring cultural landscape features; or	The proposed rezoning will assist in improving conservation outcomes, through additional native planting, careful siting of buildings, and consideration of the native flora and fauna found in the adjacent coastal corridor.

(ix) redesign of structures that interfere with ecosystem processes; or (x) decommissioning or restoring historic landfill and other contaminated sites which are, or have the potential to, leach material into the coastal marine area.	
<u>Policy 15 Natural features and natural landscapes</u> To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development: (a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and (b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment; including by: (c) identifying and assessing the natural features and natural landscapes of the coastal environment of the region or district, at minimum by land typing, soil characterisation and landscape characterisation and having regard to: (i) natural science factors, including geological, topographical, ecological and dynamic components; (ii) the presence of water including in seas, lakes, rivers and streams; (iii) legibility or expressiveness—how obviously the feature or landscape demonstrates its formative processes; (iv) aesthetic values including memorability and naturalness; (v) vegetation (native and exotic); (vi) transient values, including presence of wildlife or other values at certain times of the day or year; (vii) whether the values are shared and recognised; (viii) cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features;	The proposed rezoning does not contradict this policy with regards to effects on the environment.

(ix) historical and heritage associations; and (x) wild or scenic values; (d) ensuring that regional policy statements, and plans, map or otherwise identify areas where the protection of natural features and natural landscapes requires objectives, policies and rules; and (e) including the objectives, policies and rules required by (d) in plans.	
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Housing capacity

The *Ōamaru, Weston & Kakanui Spatial Plan (2022)*, which is a guiding document for growth uses a high-growth scenario to assess the future growth of Oamaru and its immediate surrounds over the next 30 years. From a baseline population of 15,870 in 2018, population growth of 4,950 was predicted by 2051, requiring up to 1,900 new dwellings.

More recent population monitoring and projections in the *NPS-UD Monitoring Report (2026)* shows that the Waitaki District continues to experience steady population growth. Based on the higher growth trend from 2013 – 2018, for the area of greater Ōamaru, from a baseline population of 15,870 in 2018, it forecast the population to increase by 6,693. Under this scenario 2,570 new dwellings would be required over the next 30 years. This is set out in the Table 1 below:

	2019	2020	2023	2030	2050
Medium (rebased)	15990	16110	16191	16354	16815
High (rebased)	15990	16110	16463	17358	19500
Higher (2013-18 growth trend continues)	15990	16110	16767	18301	22683

Understanding Data

Table 1: Future population change scenario results for the Oamaru Area from the NPS-UD Monitoring Report 2026

The *Ōamaru, Weston & Kakanui Spatial Plan (2022)*, which underpins the District Plan’s current Future Urban Growth (FUG) Overlay areas, has therefore already been overtaken by actual and forecast growth, demonstrating the need to provide additional housing capacity of approximately 670 dwellings by 2051.

Further studies confirm the need for increased housing capacity in Oamaru, and the demand for rural residential style housing. A National Science Challenge working paper studying population, work and housing Oamaru in 2020¹ noted that “*this growing population of Oamaru over recent years is in contrast to the decline in population from 1986 to 2006 and is creating a demand for additional housing. Also noticeable is strong growth in the population of peri-urban areas of Oamaru indicating a demand for rural lifestyle living*”. The authors also note that an increasing number of people are seeking rural living

¹ Taylor, N., Mackay, M., & Russell, K. (2020). *Searching for community wellbeing: Population, work and housing in the town of Oamaru* (Working Paper No. 20-08a). Building Better Homes, Towns and Cities National Science Challenge. Taylor, N https://www.buildingbetter.nz/wp-content/uploads/2023/08/taylor_et_al_2020_searching_for_community_wellbeing_wp20-08a.pdf

close to town. This type of growth is consistent with the proposed rezoning at Bushy Beach road which will enable development of additional rural residential style housing on the outskirts of Oamaru.

The *Otago Regional Policy Statement (2021)* requires Council to respond to a demonstrated insufficiency in housing development capacity "as soon as practicable." (UFD-P2(1)). The 670-dwelling gap identified above, using the Council's own NPS-UD monitoring report, is a demonstrated insufficiency.

The development of further housing capacity at Bushy Beach Road would go a small way to addressing insufficient future housing supply in Oamaru. The development is consistent with Policy UFD-P4 of the ORPS, which relates to expansion of existing urban areas. The housing shortfall is "identified in accordance with UFD-P2" and therefore independently justifies expansion without needing to wait for the next full spatial plan review cycle (subsection 1). The site adjoins the existing Ōamaru urban area, so development there consolidates the town's edge rather than establishing a sporadic, disconnected settlement and infrastructure (subsection 3, 4 and 5). Finally, because

Key provisions in the *Proposed Waitaki District Plan* relate to Housing choice and intensification (SD-UFD-O2), Integrated management (SD-UFD-O1), District-wide growth (SD-UFD-O5), and Urban growth (SD-UFD-O6).

Read together, these objectives set a clear test for identifying new residential capacity: they must respond to demonstrated housing need (SD-UFD-O2), be capable of integrating with infrastructure (SD-UFD-O1, SD-UFD-O6), and contribute to a sufficient, cohesively structured land supply (SD-UFD-O5). It has been demonstrated above the need for future residential capacity in Oamaru. The Bushy Beach location is contiguous with the existing urban form rather than a sporadic outlier and can be integrated with existing infrastructure in a cohesive manner.

In any case, the proposed rezoning provides for around 14 additional dwellings over the currently consented subdivision. This will contribute to a relatively small extent, but favourable direction, to increasing housing capacity in Oamaru in an appropriate and efficient manner, which is consistent with the Regional Policy Statement and Proposed District Plan.

Three waters infrastructure

Please refer to the attached servicing assessment, that has been prepared in support of the structure plan.

Transport effects

A brief assessment of transportation matters has been provided by Antoni Facey, Traffic Engineer, and is attached to this memo.

Natural hazards

Part of the subject site is located within the Proposed District Plan Coastal Erosion Hazard Overlay. Only a relatively small portion is located within this overlay, in the southeastern corner of the site. The Proposed Plan contains objectives that are relevant, in particular:

CE-O5 Climate Change

Recognise and provide for the effects of climate change and its influence on the frequency and severity of coastal natural hazards.

CE-O6 Coastal natural hazard risks and new subdivision, use and development

Subdivision, use and development does not increase the risk of social, economic or environmental harm from coastal natural hazards.

CE-O7 Coastal natural hazard risks and existing development

The risk of harm to existing development in coastal natural hazard overlays is reduced through natural defences, and the option to relocate buildings and structures to areas outside coastal natural hazard overlays is available.

It also contains policies:

CE-P2 Recognise the importance of the Coastal Environment

1. *Recognise and provide for the following matters of national importance:*
 - a. *the preservation of the natural character of the Coastal Environment and protection of it from inappropriate subdivision, use and development; and*
 - b. *protection of Natural Features and Landscapes of the Coastal Environment from inappropriate subdivision, use and development; and*
 - c. *protection of Significant Natural Areas of the Coastal Environment; and*
 - d. *the enduring cultural relationship of Kāi Tahu mana whenua to the Coastal Environment; and*
 - e. *management of significant coastal hazard risks.*

CE-P3 Precautionary approach

Adopt a precautionary approach to subdivision, use and development within the Coastal Environment, particularly in relation to potential climate change effects, where the potential adverse effects of those activities are likely to be significant but are also uncertain, unknown or little understood.

CE-P15 Coastal natural hazard risks and new subdivision, use and development

Avoid new subdivision, coastal hazard sensitive activities and associated buildings and structures within the Coastal Natural Hazard Overlays, unless a site-specific risk assessment demonstrates it will not result in an increased risk of loss of life, or serious injuries, environmental harm, or economic loss in the event of a coastal natural hazard occurrence.

CE-P16 Coastal natural hazard risks and existing development

Increase the resilience of exposed communities from coastal natural hazard risks within Coastal Natural Hazard Overlays by:

- 1. applying an adaptive management approach, which can be adjusted over time and in response to changing risk levels and tolerance or new information; and*
- 2. encouraging and enabling managed retreat, including the relocation or removal of existing buildings or structures from within coastal natural hazards areas to areas outside Coastal Natural Hazard Overlays, when natural defences are not an effective response to risk; and*
- 3. avoiding additions to existing buildings in Coastal Natural Hazard Overlays unless the increase in building footprint is minor and it does not involve the establishment of a new coastal hazard sensitive activity.*

In considering the rezoning of the subject land for a modified clustered rural residential zoning, these policies must be considered. Of note, CE-15 seeks the avoidance of new subdivision, coastal hazard sensitive activities and associated buildings and structures unless a site specific risk assessment demonstrates it will not result in an increased risk of loss of life, or serious injuries, environmental harm or economic loss in the event of a coastal natural hazard occurrence.

As can be seen on the accompanying draft structure plan, the portion of land included within this overlay is situated well back from the closest building platform. While technically, the new policy seeks to avoid subdivision of land within the overlay, the rezoning will not result in any change to the actual physical outcomes for any of the land within the coastal erosion hazard overlay.

Furthermore, the policy seeks the specific risk assessment, which would be more appropriately undertaken at subdivision consent stage than at this juncture.

Thank you for the opportunity to provide this supplementary information prior to your undertaking your assessment of this proposed rezoning. The submitter will provide evidence post receipt of your report.

Yours faithfully

Mary Clay

Principal Planner

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