

## Evaluation of options for the plan change including the proposed objective and policies

**Table 1: Evaluation of approach to the plan change**

Issue 1 - The District Plan does not give effect to national and regional policy direction

Issue 2 - There is a risk of communities being exposed to the impact of coastal hazards that will become more prevalent in the future

#	Evaluation of Options			
	Option 1 – (Preferred option) Risk-based approach	Option 2 – Do minimum	Option 3 – Avoidance of risk of harm across District	Option 4 – Avoid outside urban area, risk based approach within rural areas
	<p><b>Benefits</b> Option 1 is enabling of development where there is a lower level of risk, providing certainty of opportunities for subdivision, land use and development. It also provides certainty for landowners by clearly defining the extent of areas exposed and enabling landowners to plan, even if the risk is deemed high.</p> <p>This option strikes a balance between enabling land use and development so that people and communities can provide for their well-being, health and safety, while ensuring that coastal hazard risks are</p>	<p><b>Benefits</b> Option 2 provides flexibility for landowners where resource consent is currently not required, consistent with the status quo. In doing so, there is a reduced level of regulation compared with the other options.</p> <p>It provides certainty for those in areas subject to risks of coastal hazards by increasing awareness of the risk.</p> <p><b>Costs</b> Option 2 does not manage the risk posed by coastal hazards for all subdivision, land use and development. While it will reduce the costs of recovery</p>	<p><b>Benefits</b> Option 3 provides for resilience by restricting subdivision, land use and development, and in doing so, avoiding an increased risk of harm. In defining the extent of areas exposed, it provides certainty for communities while increasing awareness of the risks of hazards. It gives people a level of confidence that Council is acting to address the risks of climate change.</p> <p>Option 3 will have reduced economic and social costs of recovery (including repair and rebuilding) from future events relative to the status quo,</p>	<p><b>Benefits</b> This option supports an outcome of urban growth being located away from areas at risk of coastal hazards. In doing so, it provides confidence to communities that Council is acting to address the risks as well as providing certainty in defining areas exposed to hazards. In urban areas, this option is consistent with option 1.</p> <p><b>Costs</b> This option would have the same costs for rural landowners as option 3. Option 4 would not provide an equitable approach for land owners and developers across the district, increasing the</p>

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	<p>addressed to avoid increasing the risk of harm. In managing the risk of harm, there are reduced economic and social costs of recovery (including repair and rebuilding) from future events relative to the status quo, allowing communities to recover faster.</p> <p><b>Costs</b></p> <p>This option has the potential to increase compliance costs relative to the status quo, due to, controls on subdivision, land use and development that do not exist at present.</p> <p>Methods to mitigate the risk may result in additional costs of development e.g. higher floor levels.</p> <p>This option limits or precludes development opportunities in areas defined as having a medium and high risk of harm. This may reduce investment and</p>	<p>relative to the status quo, it will continue to result in harm to communities in the absence of comprehensive management of the risks. This will contribute to costs from repair and rebuilding. There are additional compliance costs with floor level requirements introduced where they may not apply at present and additional matters of discretion for restricted discretionary activities.</p> <p><b>Efficiency</b></p> <p>Option 2 is not comprehensive in only managing risks where resource consent is already required. It is therefore not responsive to the risk of hazards where activities are otherwise enabled by the District Plan. As a consequence, there may be inefficiencies arising e.g. investment in land and buildings that may be exposed to a risk in the short-term.</p>	<p>allowing communities to recover faster.</p> <p><b>Costs</b></p> <p>Option 3 would introduce a high level of additional regulatory burden, with costs associated with a consenting process. While resource consent may be obtained, this option may reduce the potential for subdivision, land use and development across all areas identified as prone to coastal hazards. This would lead to reduced levels of investment and property values, contributing to reduced levels of amenity.</p> <p><b>Efficiency</b></p> <p>Option 3 fails to recognise differing levels of risk across the District and unnecessarily restricts subdivision, land use and development even where there are changes in risk e.g. sea levels not rising at the rate anticipated. This will result in the</p>	<p>regulatory burden for rural communities more than urban areas. In not having regard to the different levels of risk, it places a burden on landowners wishing to use or develop their land. Even if consent may be obtained, it necessitates a consenting process.</p> <p><b>Efficiency</b></p> <p>Option 4 uses the spatial extent of the urban area to determine the approach for managing risks, which does not have regard to varying levels of risk in rural areas. It is therefore a blunt approach that is not responsive to the nature or extent of risk and places greater restrictions in areas that are less populous and where there is a lower level of development. Like option 3, it will result in the inefficient use of resources, particularly in rural areas, as land is left vacant or under-utilised due to unnecessary restrictions. It will</p>

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	<p>property values, leading to a reduced level of amenity.</p> <p><b>Efficiency</b></p> <p>Option 1 enables a nuanced approach to managing risk, with restrictions varying according to levels of risk<sup>1</sup>. It allows communities to make informed decisions that avoid increasing risk and in doing so, to utilise resources including land and buildings more efficiently. For example, a decision can be made to not invest in improvements to a property if there is a risk of flooding in the short-term. Conversely, a longer term risk enables a landowner to utilise their land in the short to medium term, and in doing so, this contributes to the efficient use of resources.</p>	<p>The option includes the identification of areas of risk. In doing so, people and communities are better informed of risks and can respond as they see fit where there is not a requirement for resource consent.</p> <p><b>Effectiveness</b></p> <p>Option 2 enables the risks of coastal hazards to be managed where resource consent is otherwise required. However, it does not adequately manage all subdivision, land use and development in areas at risk, and could result in harm to people, the environment and the economy. It therefore does not give effect to Objective 5 and Policy 25 of the NZCPS or Objective 11.2.2 of the RPS. While introducing additional matters of discretion for</p>	<p>inefficient use of resources as land is left vacant or under-utilised due to unnecessary restrictions. It will also result in greater compliance costs associated with resource consent processes, which may not be necessary in all instances.</p> <p><b>Effectiveness</b></p> <p>Option 3 reduces the risk of exposure of subdivision, land use and development by seeking the avoidance of harm from coastal hazards, contributing to Objective 5 of the NZCPS of locating new development away from areas prone to such risks. It also gives effect to Objective 11.2.2 of the CRPS by avoiding development which increases risk of natural hazards. This contributes to improved resilience.</p>	<p>also result in greater compliance costs</p> <p><b>Effectiveness</b></p> <p>Option 4 reduces the risk of exposure, similar to option 3, in rural areas. In doing so, it will avoid urban expansion into rural areas that may not be suitable for development. However, it could harm the ability of rural communities to meet their social and economic needs, which is not in accordance with Objective 5 of the NZCPS, nor Objective 3.3.1 of the District Plan that seeks to enable the community to meet their immediate and longer-term needs.</p> <p>Option 4 provides measured flexibility to enable new</p>

<sup>1</sup> The categorisation of areas at risk has regard to changing sea levels. It does this by defining areas with a lower level of risk where coastal flooding / erosion is not anticipated to occur in the short term.

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	<p>On this basis and the preceding identification of benefits and costs, the benefits of this option are considered to outweigh the costs.</p> <p><b>Effectiveness</b></p> <p>Option 1 manages subdivision, land use and development in a way that an increased risk of harm or damage is avoided, having regard to the level of risk. In doing so, it gives effect to Objective 5 and policy 25 of the New Zealand Coastal Policy Statement (NZCPS), the former seeking that new development is located away from areas prone to coastal hazard risks. In areas exposed to a high risk of harm, for instance, where depths of coastal flooding pose a risk to life, this option seeks to avoid development that will increase that risk. Conversely, this option enables subdivision, land use and</p>	<p>restricted discretionary activities, it is more permissive than the other options and similar to the status quo. In doing so, it is more consistent with Objective 3.2.2 of the District Plan that seeks to minimise transaction costs and reliance on resource consent processes.</p> <p><b>Risk of acting, not acting</b></p> <p>Coastal hazard risk is based on the most up to date information. It is acknowledged there are uncertainties around sea level rise. The risk of acting based on the information available is considered to be low.</p> <p>By not managing subdivision, land use and development in areas at risks of coastal hazards, there is a risk of inappropriate development occurring in these areas and being subject to unacceptable risk.</p>	<p>Option 3 restricts people and communities in how they use their property in seeking to avoid subdivision, land use and development that increases any level of risk of harm. This is inconsistent with Objective 3.3.2 of the District Plan of minimising transaction costs and reliance on resource consent processes. It also does not enable people to provide for their social and economic well-being to the extent of other options, which is not in accordance with Objective 5 of the NZCPS, nor Objective 3.3.1 of the District Plan that seeks to enable the community to meet their immediate and longer-term needs.</p> <p><b>Risk of acting, not acting</b></p> <p>Coastal hazard risk is based on the most up to date information. It is acknowledged there are uncertainties around sea level rise. The risk of acting based on</p>	<p>activities within established urban areas at risk subject to appropriate mitigation. It is therefore as effective as Option 1 in the urban area. In doing so, it gives effect to Objective 5 and policy 25 of the New Zealand Coastal Policy Statement (NZCPS), the former seeking that new development is located away from areas prone to coastal hazard risks.</p> <p><b>Risk of acting, not acting</b></p> <p>Coastal hazard risk is based on most up to date information. It is acknowledged there are uncertainties around sea level rise. The risk of acting based on the information available is considered to be low.</p> <p>By not managing subdivision, land use and development in areas at risks of coastal hazards it would create the risk of inappropriate development occurring in these areas and</p>

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	<p>development in areas of risk where the effects of coastal hazards can be adequately managed.</p> <p>In areas of lower risk, this option provides for the ongoing use of land and development until such time that the risk emerges i.e. sea levels reach a defined point. In doing so, it enables people to provide for their social and economic well-being in accordance with section 5 of the Resource Management Act and Objective 5 of the NZCPS.</p> <p>As outlined above, option 1 seeks to avoid increasing risk of social, economic, cultural and environmental harm and it is therefore consistent with and gives effect to the NZCPS (Objective 5 and policy 25), RPS (Objective 11.2.1) and Objective 3.3.6 of the District Plan.</p> <p><b>Risk of acting, not acting</b></p>		<p>the information available is considered to be low.</p> <p>By not managing subdivision, land use and development in areas at risks of coastal hazards it would create the risk of inappropriate development occurring in these areas and being subject to unacceptable risk.</p>	<p>being subject to unacceptable risk.</p>

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	<p>Coastal hazard risk is based on most up to date information. It is acknowledged there are uncertainties around sea level rise. The risk of acting based on the information available is considered to be low.</p> <p>By not managing subdivision, land use and development in areas at risks of coastal hazards it would create the risk of inappropriate development occurring in these areas and being subject to unacceptable risk.</p>			

**Table 2: Evaluation of proposed objective and alternative - Most appropriate way to achieve the purpose of the Act**

#	Evaluation of Options	
	<p data-bbox="405 236 1021 264"><b>Option 1 – (Preferred option) Risk-based approach</b></p> <p data-bbox="405 309 831 338"><b>Objective 5.2.1.2 – Coastal Hazards</b></p> <ul style="list-style-type: none"> <li data-bbox="454 381 1133 517">a. Development, subdivision and land use does not increase the risk of coastal inundation, coastal erosion, rising groundwater or tsunami causing physical, social, economic or environmental harm.</li> <li data-bbox="454 525 1133 730">b. Existing communities potentially affected by coastal hazards are able to continue to develop and use land, natural and physical resources where the risk of adverse effects from coastal hazards is not increased and the level of risk can be managed to an acceptable level.</li> </ul>	<p data-bbox="1167 236 1928 300"><b>Option 2 – Alternative – Status quo (rely on strategic objective 3.3.6 with no specific coastal hazards objective)</b></p> <p data-bbox="1167 344 1570 373"><b>Objective 3.3.6- Natural Hazards.</b></p> <ul style="list-style-type: none"> <li data-bbox="1216 381 1984 767">a. New subdivision, use and development (other than new critical infrastructure or strategic infrastructure to which paragraph b. applies): <ul style="list-style-type: none"> <li data-bbox="1265 488 1973 624">i. is to be avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and</li> <li data-bbox="1265 632 1957 767">ii. in all other areas, is undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated.</li> </ul> </li> <li data-bbox="1216 775 1984 1166">b. New critical infrastructure or strategic infrastructure may be located in areas where the risks of natural hazards to people, property and infrastructure are otherwise assessed as being unacceptable, but only where: <ul style="list-style-type: none"> <li data-bbox="1265 919 1827 948">i. there is no reasonable alternative; and</li> <li data-bbox="1265 956 1984 1091">ii. the strategic infrastructure or critical infrastructure has been designed to maintain, as far as practicable, its integrity and form during natural hazard events; and</li> <li data-bbox="1265 1099 1939 1166">iii. the natural hazard risks to people, property and infrastructure are appropriately mitigated.</li> </ul> </li> <li data-bbox="1216 1174 1973 1270">c. There is increased public awareness of the range and scale of natural hazard events that can affect Christchurch District.</li> <li data-bbox="1216 1278 1935 1345">d. The repair of earthquake damaged land is facilitated as part of the recovery.</li> </ul>



<p><b>Resource Management Act s.5</b></p>	<p>This objective seeks a balance that enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while managing coastal hazard effects consistent with s5(2).</p> <p>The second clause in the objective also enables people to continue to develop and use natural and physical resources where the risk of adverse effects from coastal hazards is not increased and the level of risk can be managed to an acceptable level which provides for social and economic well-being consistent with s5(2).</p>	<p>Objective 3.3.6, while broadly consistent with s5(2), does not specifically seek to address the effects of coastal hazards and associated impacts of climate change. Coastal hazards including increasing sea level rise have the potential to adversely affect the wellbeing, health and safety of people and communities.</p>
<p><b>Resource Management Act s.6</b></p>	<p>More fully recognises and provides for the management of significant risks from natural hazards, consistent with s6(h).</p>	<p>The objective does not fully recognise and provide for the matter of national importance relating to management of significant risks from coastal hazards.</p>
<p><b>Resource Management Act s.7</b></p>	<p>More clearly has particular regard to the effects of climate change consistent with s7(i).</p>	<p>The objective does not have particular regard to the effects of climate change in the context of coastal hazards and is therefore not fully addressed.</p>
<p><b>Resource Management Act s.31</b></p>	<p>More clearly aligns with s31(1)(b)(i) as it provides for the avoidance and mitigation of natural hazards, in particular coastal hazards.</p>	<p>The objective does not accord with s31(1)(b)(i) as coastal hazards risk is not fully addressed to the extent of the preferred option.</p>
<p><b>New Zealand Coastal Policy Statement (NZCPS)</b></p>	<p>More fully in line with Objective 5 and Policy 25 of the NZCPS. The new objective will ensure development does not increase the risk of coastal hazards.</p>	<p>The objective does not give effect to Policy 25 of the NZCPS direction to avoid increasing the risk of social, environmental and economic harm from coastal hazards. Regarding Objective 5, Objective 3.3.6 does not fully address the effects of climate change.</p>

<p><b>Canterbury Regional Policy Statement (RPS)</b></p>	<p>The RPS requires (in Objective 11.2.1) new subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure to be avoided or, where avoidance is not possible, mitigation measures minimise such risks. RPS policies 11.3.1 and 11.3.2 also requires 'avoidance' with some exceptions.</p> <p>The objective is consistent with the RPS as it manages coastal hazard risk on people, property, infrastructure and the environment and ensures development does not increase the risk of coastal hazards.</p>	<p>Objective 3.3.6 does not give effect to, and protect people from coastal hazard risk and the effects of climate change and sea-level rise to the extent of the preferred option.</p>
<p><b>Chapter 3 of District Plan (Objective 3.3.6)</b></p>	<p>This objective is risk based and aligns with Strategic Objective 3.3.6. The new objective seeks that new development does not increase risk from coastal hazards and Objective 3.3.6 seeks that unacceptable risk from natural hazards is avoided.</p>	<p>This option is to rely on Strategic Objective 3.3.6.</p>
<p><b>Conclusion</b></p>	<p>Option 1 – Objective 5.2.1.2 more fully gives effect to the Act, the NZCPS and the RPS. Given the specific direction in the Act, the NZCPS and the RPS, it is concluded that Option 1 is the most appropriate way to achieve the purpose of the Act.</p>	

**Table 3: Evaluation of options for provisions (Policies, Methods)**

Issue 1 - The District Plan does not give effect to national and regional policy direction

Issue 2 - There is a risk of communities being exposed to the impact of coastal hazards that will become more prevalent in the future

#	Provision	Evaluation of Options	
		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
	<p><b><u>Policy 5.2.2.5 Policies for Coastal Hazards</u></b></p> <p><b><u>5.2.2.5.1. Risk based approach to Coastal Hazards</u></b></p> <p>A. Map areas for coastal hazards based on: ...</p> <p>B. Apply controls over the development, subdivision and use of land that are proportionate to the level of risk from coastal hazards.</p>	<p><b>Benefits</b></p> <p>This policy provides certainty for land owners as it requires identification of affected areas, enabling them to make informed decisions.</p> <p>The risk based approach could provide social and economic benefits as it allows development where appropriate.</p> <p><b>Costs</b></p> <p>This policy would result in reduced use/development rights, increased consent costs and time and potentially reduced property values, particularly in higher risk areas.</p> <p><b>Efficiency</b></p> <p>Meets intent of the objective 5.2.1.2 and benefits outweigh costs. The proposed policy identifies areas susceptible to coastal hazards and in doing so, it allows communities to make informed decisions that avoid increasing risk and in doing so, to utilise resources including land and buildings more efficiently.</p>	<p>Consideration has also been given to the following alternatives:</p> <ol style="list-style-type: none"> <li>a) No policy</li> <li>b) A policy that addresses risk across the area affected by coastal hazards without differentiation of areas according to the level of risk</li> </ol> <p>Having no policy on risk identification would not be as effective or efficient given areas susceptible to coastal hazards would not be identified (as required in the NZCPS) and therefore coastal hazards would not be adequately managed.</p> <p>Having a policy with one level of risk area would allow for a more uniform approach to managing risk, however it would not be as responsive to circumstances as the risk based approach. It would still give effect to the NZCPS and RPS if a restrictive approach was taken. Conversely, a more enabling approach across the area would not avoid an increased risk of harm and would therefore not give effect to the NZCPS and RPS.</p>

#	Provision	Evaluation of Options	
		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
		<p><b>Effectiveness</b></p> <p>This policy ensures coastal hazards are identified and mapped, consistent with NZCPS (Policy 24). In line with the new objective.</p> <p><b>Risk of acting, not acting</b></p> <p>Low risk in acting with some uncertainties given nature of coastal hazards for which there will always be a degree of uncertainty.</p> <p>Not acting would result in inappropriate subdivision and development in areas at risk of coastal hazards.</p>	<p>The benefits of the above alternative changes to the provisions have been considered and on balance are outweighed by the costs. It is deemed to be less efficient and effective than the proposal for the reasons explained above.</p> <p>The risks associated with not implementing Option 2 alternatives are considered low for the same reasons as Option 1.</p>
	<p><u>5.2.2.5.2.Avoid increasing risk from Coastal Hazards</u></p> <p>Within areas of coastal hazards avoid development, subdivision and land use that would increase the risk of social, environmental and economic harm from coastal hazards unless:</p> <ul style="list-style-type: none"> <li>i. it is dependent on a coastal location, and</li> <li>ii. there are no other reasonable alternatives available, and</li> <li>iii. the benefits of the proposed development out-weigh the potential harm, and</li> </ul>	<p><b>Benefits</b></p> <p>This policy provides more certainty for land owners in affected areas and provides scope for development, subdivision and land use where the criteria are met.</p> <p>Minimises economic and social effects by ensuring inappropriate development does not occur and risk is not increased.</p> <p><b>Costs</b></p> <p>This policy would result in reduced use/development rights, increased consent costs and time as well as likely reduced property values.</p>	<p>An alternative of the status quo would be to have no specific policy on coastal hazards. This would reduce certainty for land owners while also increasing the risk of inappropriate development in at risk areas. This would not be well aligned with the objective as it would result in less restrictions on building development at risk of coastal hazards.</p> <p>Costs of the status quo would outweigh the benefits as articulated for option 2 in Table 1.</p>

#	Provision	Evaluation of Options	
		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
	iv. the adverse effects from coastal hazards and the development on people, property, infrastructure, the environment and cultural values are mitigated to the fullest extent practicable.	<p><b>Efficiency</b></p> <p>Meets intent of objective 5.2.1.2 and benefits outweigh costs. The policy appropriately restricts development to ensure development does not increase the risk of harm in areas susceptible to coastal hazards.</p> <p><b>Effectiveness</b></p> <p>This policy ensures increased risk from potential coastal hazards is avoided or mitigated to the fullest extent practicable in certain circumstances, consistent with direction in the NZCPS (Policy 25) and RPS (Objective 11.2.1). This policy is also in line with new objective 5.2.1.2.</p> <p><b>Risk of acting, not acting</b></p> <p>There is low risk in acting with some uncertainties. Given the nature of coastal hazards, there will always be a degree of uncertainty regarding sea level rise.</p> <p>Not acting would result in inappropriate subdivision and development in areas at risk of coastal hazards.</p>	
	<p><u>5.2.2.5.3. Managing subdivision, development and land use in Coastal Hazards areas</u></p> <p>Subject to policy 5.2.2.5.2, any subdivision, development and land use within coastal hazards areas shall:</p>	<p><b>Benefits</b></p> <p>Provides certainty for land owners directing what is acceptable in affected areas.</p> <p>Manages risk to people and property in affected areas.</p>	An alternative would be to rely on the status quo. This would mean no clear direction on development in hazard areas, resulting in an increased risk of harm. In doing so, costs would outweigh the benefits as articulated for option 2 in Table 1.

#	Provision	Evaluation of Options	
		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
	<p>A. be located in the lowest risk category possible;</p> <p>B. not rely on mitigation provided by private coastal management works outside the site;</p> <p>C. be designed, constructed and located to avoid harm, or where this is not possible effects are mitigated to an acceptable level and harm to people, property, infrastructure and the environment is minimised;</p> <p>D. ensure outcomes are compatible with the anticipated environmental characteristics of the area and its cultural values;</p> <p>E. identify an appropriate risk based trigger point when it will be necessary to:</p> <ul style="list-style-type: none"> <li>i. review use of the site, or</li> <li>ii. remove or relocate the development or activity;</li> </ul> <p>F. provide for appropriate remediation of the site subsequent to the removal, relocation or cessation of the activity. This shall be have particular regard to an</p>	<p>Allows for appropriate development providing social and economic benefits (as opposed to completely avoiding development in these areas).</p> <p><b>Costs</b></p> <p>This policy would result in reduced use/development rights and increased consent costs and time. In addition reduced property values is another potential cost.</p> <p><b>Efficiency</b></p> <p>Meets intent of objective 5.2.1.2 and benefits outweigh costs. The policy appropriately restricts development to ensure adverse effects are minimised in areas susceptible to coastal hazards.</p> <p><b>Effectiveness</b></p> <p>The policy ensures subdivision, new development and change of use does not unduly increase coastal hazard risk to people and property, giving effect to the NZCPS and RPS.</p> <p><b>Risk of acting, not acting</b></p> <p>Low risk in acting with some uncertainties given the nature of coastal hazards for which there will always be a degree of uncertainty.</p>	

#	Provision	Evaluation of Options	
		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
	adaptation plan for the area, or where no adaptation plan exists be in keeping with the local environment at the time.	The risk of not acting is inappropriate development will occur in at risk areas.	
	<p><u>5.2.2.5.4. Adaptation, alteration and maintenance of existing buildings and properties within areas of Coastal Hazards</u></p> <p>Provide for maintenance, replacement, adaptation and alteration of existing structures, and associated earthworks within areas affected by coastal hazards, subject to criteria A – F in Policy 5.2.2.5.3.</p>	<p><b>Benefits</b></p> <p>This policy provides for economic, and social well-being by allowing for adaptation, alteration and maintenance of existing buildings and properties while managing the risk of coastal hazards.</p> <p>This policy provides certainty and clear direction for property owners.</p> <p>Reduced social and economic cost as coastal hazards mitigated on existing properties.</p> <p><b>Costs</b></p> <p>Increased consenting requirements/compliance costs.</p> <p><b>Efficiency</b></p> <p>Benefits outweigh costs on the basis that the policy provides for development while avoiding an increase in the risk of harm. In line with the coastal hazards objective.</p> <p><b>Effectiveness</b></p> <p>This policy allows for coastal hazard risk to be appropriately managed and development appropriate to</p>	<p>An alternative would be to rely on the status quo. There would be no clear direction on adaptation, alterations and maintenance of existing development, potentially impeding social and economic well-being, and/or could result in inappropriate development in areas at risk of coastal hazards. Not as in line with the objective.</p>

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		<p>the level of risk, consistent with direction in the NZCPS (Policy 25) and RPS (Objective 11.2.1).</p> <p><b>Risk of acting, not acting</b></p> <p>There is minimal risk in acting with data uncertainties.</p> <p>The risk in not acting is that there could be inappropriate development that is at risk from coastal hazards.</p>	
	<p><u>5.2.2.5.5. Innovative forms of development and design within Coastal Hazards areas</u></p> <p>Innovative forms of design and methods of construction to address coastal hazards risk are encouraged where they avoid an increased risk of harm or provide enhanced mitigation of adverse effects.</p>	<p><b>Benefits</b></p> <p>Encouraging innovative forms of development could result in increased resilience of development and other structures helping to minimise coastal hazard risk to people and property.</p> <p><b>Costs</b></p> <p>There could be economic costs associated with innovative development, possibly not being accessible to everyone.</p> <p><b>Efficiency</b></p> <p>The benefits outweigh the costs on the basis that it facilitates more flexibility in how communities adapt and enables mitigation that may otherwise not be anticipated.</p> <p><b>Effectiveness</b></p>	<p>An alternative would be the status quo of no policy. This could result in less design flexibility, an unduly complex consenting process for innovative forms of development, and less resilience to coastal hazard risk.</p>



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		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
		<p>This policy assists in increasing resilience to coastal hazards and is in line with the objective.</p> <p><b>Risk of acting, not acting</b></p> <p>There is minimal risk in acting.</p> <p>The risk in not acting could result in a more challenging consent process for innovative development.</p>	
	<p><u>5.2.2.5.6. Hazard sensitive activities</u></p> <p>A. Activities and development that provide accommodation or services for users that are more vulnerable to the adverse effects of coastal hazards than the general population shall be avoided within areas of coastal hazards, unless within areas of low or very low risk there is an identified need that cannot be met elsewhere and mitigation based on an evaluation of the vulnerability of users is provided to an acceptable level.</p> <p>B. The evaluation of the vulnerability of users shall include considerations of:</p> <p style="padding-left: 20px;">i. the level of exposure of occupants and users to risks from coastal hazards;</p>	<p><b>Benefits</b></p> <p>Minimises coastal hazard risk to people who are more vulnerable to coastal hazards.</p> <p>Certainty for developers and the community that vulnerable activities and development is not anticipated in the most at risk areas.</p> <p><b>Costs</b></p> <p>Restricts certain types of new development in medium and high risk areas which could have social and economic costs.</p> <p><b>Efficiency</b></p> <p>This policy will help minimise risk by ensuring vulnerable activities are appropriately located.</p> <p><b>Effectiveness</b></p>	<p>An alternative would be the status quo of no policy. Vulnerable activities would be treated the same as other activities and it could result in inappropriate development in at risk areas.</p>

#	Provision	Evaluation of Options	
		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
	<ul style="list-style-type: none"> <li>ii. the operational period and practices for the activity;</li> <li>iii. the nature and number of users, their mobility and ability to safely evacuate; and</li> <li>iv. the potential level of social and economic harm and risk to life.</li> </ul>	<p>This policy assists in minimising coastal hazard risk to more vulnerable persons, consistent with Objective 5.2.1.2.</p> <p><b>Risk of acting, not acting</b></p> <p>There is minimal risk in acting with data uncertainties.</p> <p>The risk in not acting is that inappropriate new hazard sensitive activities and development could occur in areas at risk from coastal hazards.</p>	
	<p>5.2.2.5.7. Protection from Coastal Hazards</p> <p>A. Development, subdivision and land use shall avoid causing harm to the integrity of existing:</p> <ul style="list-style-type: none"> <li>i. coastal management works, and</li> <li>ii. natural features, including dune systems and coastal wetlands that provide defence from coastal hazards.</li> </ul> <p>unless they form part of a planned renewal, replacement or adaptation process.</p> <p>B. Coastal management works to manage the effects of coastal hazards on people, property, infrastructure and the environment shall:</p>	<p><b>Benefits</b></p> <p>This policy provides direction on protection from potential coastal hazards allowing for a consistent approach to managing these hazards.</p> <p>Encouraging nature based mitigation would result in environmental benefits and possibly cultural benefits as well as providing amenity value.</p> <p>Social and economic benefits as existing coastal management works are protected.</p> <p>Potentially reduced environmental costs by prioritising nature based protection.</p> <p><b>Costs</b></p> <p>More difficult consenting avenue to remove existing protection structures.</p>	<p>An alternative would be the status quo of no policy. This would mean there is no direction encouraging natural solutions over hard engineering and no weighting to Coastal Adaptation Plans. This would be less effective in implementing the NZCPS and would have more costs in terms of environmental impacts.</p>

#	Provision	Evaluation of Options	
		Option 1 – (Preferred option) Risk-based approach	Option 2 – Alternative
	<p>i. prioritise natural and nature based options over hard engineering solutions; and have particular regard to the implementation methods in a relevant Coastal Adaptation Plan for the area.</p>	<p><b>Efficiency</b></p> <p>The policy seeks to avoid harm to coastal management works and natural features that serve the benefit for the community of providing protection. The benefits are therefore deemed to outweigh the costs. The policy is also effective in implementing objective 5.2.1.2.</p> <p><b>Effectiveness</b></p> <p>This policy is consistent with the NZCPS direction to discourage hard protection structures and promote the use of alternatives to them, including natural defences.</p> <p>This policy is more restrictive in that it seeks to prioritise natural and nature based options whereas the NZCPS promotes alternatives including but not exclusively natural defences.</p> <p><b>Risk of acting, not acting</b></p> <p>Not acting could result in an inconsistent approach to managing/mitigating coastal hazards, and adverse effects on ecosystems, people and property.</p>	