

1. My name is Anita Collie, and my experience and qualifications are outlined in my statement of evidence dated 3 March 2025. I am providing planning evidence on behalf of five submitters, all of whom own rural residential properties in Okuru and Hannah's Clearing.
2. Each submitter holds a land use consent authorising the construction of a residential building on land currently undeveloped for residential purposes. Their submissions essentially seek certainty to ensure the ongoing reasonable use of their residential land.
3. The Section 42A report initially suggested that these submitters might be subject to additional resource consent requirements, as referenced in paragraph 65 of my brief of evidence. However, Mr Beban has clarified today that he considers there is no requirement for additional resource consents, where a land use consent authorises residential activity. I agree that the submitters have the right to construct a residential building on their vacant land and that this should not be subject to further resource consent requirements under the TTPP. Once the dwellings are constructed, they would be protected by existing use rights. Clarity is however sought in terms of additions and alterations to such buildings, for flexibility in terms of variations or alternative buildings on those sections otherwise already intended for such purposes, and for replacements if required.
4. Mr Beban does agree it is appropriate to provide for residential units on existing vacant sites and proposes an additional policy and rule in the rebuttal evidence at paragraph 13. I have several minor wording comments on these provisions:
 - a. Part a of the policy appears to intend that, within a given vacant site, consideration should first be given to whether it is practical to relocate a residential unit outside the overlay (assuming the overlay does not cover the entire site) rather than requiring consideration of relocation to a different site. However, this intent is not clearly conveyed in the current wording. This could be remedied by a minor amendment to part a. of the policy: "Locating a residential unit ~~on a~~ **elsewhere on the** site ..."
 - b. Part b of the policy requires that mitigation measures be incorporated into the building. I consider this wording unnecessarily restrictive, as it limits mitigation measures to the building itself rather than allowing for consideration of site-wide mitigation approaches. I recommend the deletion of the phrase "*into the building*", aligning the wording with the drafting of other policies, such as Policy 11a

(renumbered as P7 in the rebuttal evidence). This amendment should also be reflected in clause b of the matters of discretion under the new rule.

- c. Additionally, I recommend incorporating the word "*reasonably*" before "*practicable*" in both the rule and the policy to provide greater clarity and hold consideration of alternative locations to those that are reasonable.
5. Mr Beban's rebuttal evidence at paragraph 8 refers to outcomes sought by my evidence; however, I refer the panel to paragraph 78 of my evidence for a full summary as there is additional nuance to the outcomes sought not included in Mr Beban's paragraph 8.
6. Critical to the outcomes sought in my paragraph 78 is pairing the definition of a residential unit with building placement and design matters, enabling an alternative pathway (to floor area) to meeting the NZCPS directive to avoid increasing risk in Policy 25(a). I don't agree with Mr Beban's opinion that I only consider life risk – consideration of social and economic risk is reflected in consideration of building placement and design. My opinion is that construction of new buildings on the coastal severe overlay should only be permitted where there has already been an assessment of suitable building location in respect of coastal hazards (refer to my evidence 78(b)(i)) and this is consistent with the NZCPS. Imposing an additional consent process would create an unnecessary regulatory burden without providing any clear additional benefits.
7. Rule NH-R1 permits the like-for-like replacement of lawfully established buildings, subject to specific criteria. However, there appears to be a gap in the rule framework, as the replacement of a lawfully established building within the coastal hazard erosion and inundation overlay is not explicitly included in Rule R1, nor any other rule. It is unclear whether this is intentional.
8. At paragraph 72 of my statement of evidence, I note that Rule NH-R1 requires the disruption to be due to a natural hazard-related reason. I remain of the view that this condition adds unnecessary complexity without clear benefit and that it should be removed from the rule.
9. Mr Beban has proposed extending the timeframe for rebuilding to four years. While I consider this an improvement, I would support an extension to five years, given that rebuilding and insurance processes often take longer than anticipated. This is also a reflection of presumed lapse dates for land use consents.

10. With regard to minor additions and alterations to properties, paragraph 68 of my statement of evidence addresses this matter. Considering NZCPS Policy 25, I do not consider that minor additions or alterations constitute a redevelopment nor do they represent a change in land use. Hence, Policy 25(a) is relevant and the key question is whether minor additions and alterations to a dwelling can be done while avoiding increasing the risk of social, environmental, and economic harm from coastal hazards. As outlined in my evidence, this could be achieved by regulating the number of residential units in conjunction with building placement (e.g., further from the risk) and design controls (e.g. minimum floor levels). In terms of the current rule drafting this would fall as a non-complying activity in the Coastal Severe Overlay and restricted discretionary in the Coastal Alert Overlay. I maintain the position that these should be:

- a. Permitted (subject to standards) or restricted discretionary in the Coastal Alert Overlay, and
- b. Restricted discretionary (subject to standards) or non-complying in the Coastal Severe Overlay.