

# Further submission on a publicly notified plan change to the Christchurch District Plan

For office use only  
F-Submission no:

Clause 8 of Schedule 1, Resource Management Act 1991

Further submissions can be:

**Posted to:** City Planning Team  
Christchurch City Council  
PO Box 73012  
Christchurch 8154

**Delivered to:** Ground floor reception  
53 Hereford Street  
Christchurch  
Attn: City Planning Team

**Emailed to:** [PlanChange@ccc.govt.nz](mailto:PlanChange@ccc.govt.nz)

For Office Use Only  
Received in Council Office

Date	Time	Person
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*\* Denotes required information*

I wish to make a further submission on:
Plan Change Number: * 14
Your name and contact details
Full name of person <b>or</b> organisation making submission: * Toka Tū Ake EQC
Address for service: * PO Box 311, Wellington 6140

Email: resilience@eqc.govt.nz	Phone:*
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<b>Person of interest declaration* (select appropriate)</b>
<p>I am (state whether you are):</p> <p><input type="checkbox"/> (a) a person representing a relevant aspect of the public interest, or</p> <p><input checked="" type="checkbox"/> (b) a person who has an interest in the proposal that is greater than the interest the general public has, or <input type="checkbox"/></p> <p><input type="checkbox"/> (c) the local authority for the relevant area.</p> <p>Explain the grounds for saying you come within category (a) or (b) above:  Toka Tū Ake EQC is a Crown Entity responsible for providing insurance to residential property owners against the impact of natural hazards. We also invest in and facilitate research and education about natural hazards, and methods of reducing or preventing natural hazard damage. The contingent liability associated with natural hazard risk in New Zealand is high and is carried, in large part, by Toka Tū Ake on behalf of the Crown. Toka Tū Ake therefore has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand</p>

<b>Note to person making further submission</b>
<p><b><i>A further submission can only support or oppose an original submission listed in the summary. It is <u>not</u> an opportunity to make a fresh submission on matters not raised in the submissions.</i></b></p> <p><b><i>A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council.</i></b></p>

<b>I support / oppose (choose one) the submission of:*</b>
<p><i>(Please insert the name and address of the original submitter, and submission number of the original submission. If you are making a further submission on multiple submitters, please use the <b>table form</b> on the last page and make sure it is attached.)</i></p> <p><b>See attached table</b></p>
<b>The particular parts of the submission that I support / oppose (choose one) are:*</b>

(You should clearly indicate which parts of the original submission you support or oppose (**state S and D number as shown in the summary of submission**), together with the relevant provision of the proposed Plan Change.)

See attached table

The reasons for my support (or opposition) are:\* (Please give precise details)

See attached table

I seek that the whole or part of the submission be allowed / disallowed:\* (Please specify the relevant parts)

See attached table

Please indicate by ticking the relevant box whether you wish to be heard in support of your further submission\*

☐ I wish to / ☒ I do not wish to speak at the hearing in support of my further submission.

Joint submissions (Please tick this box if you agree)

☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

If you have used extra sheets for this further submission, please attach them to this form and indicate below\*

<input checked="checked" type="checkbox"/> Yes, I have attached extra sheets.	<input type="checkbox"/> No, I have not attached extra sheets.
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**Signature of submitter** *(or person authorised to sign on behalf of submitter)*

*A signature is not required if you make your submission by electronic means.*

Signature:

Date: 19/07/2023

**Submissions are public information**

The information requested in this submission, including your contact details is required by the Resource Management Act 1991. A copy of your submission will be made available for inspection at all Council service centres and libraries in accordance with the requirements of the Act. A document summarising all submissions and including names and addresses of submitters will be posted on the Council's website.

If you consider there are compelling reasons why your contact details should be kept confidential, you should contact the Statutory Administration Advisor at 941 8999.

<b><u>Original Submitter's Name and Address for service*</u></b>	<b>Submission No.</b>	<b>Decision No.</b>	<b>Support or Oppose*</b>	<b>Reasons for support / opposition* (Please give precise details)</b>	<b>Decision sought (I seek the whole or part of the submission to be allowed / disallowed)* (Please specify the relevant parts)</b>
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 <a href="mailto:developmentplanning@kaiingaora.govt.nz">developmentplanning@kaiingaora.govt.nz</a>	834	834.110	Oppose	<p>We support a risk-based approach to development, subdivision and land use that would provide for intensification in areas which are at medium risk of natural hazards. This means that some restrictions may apply to certain land uses, depending on the level of risk.</p> <p>Table 5.2.2.1a 'Thresholds for coastal inundation' is referred to in this policy. We note that this table specifically refers to flood depth with two sea level rise thresholds. Sea level risk and coastal flooding do not have the same characteristics as the velocity of a tsunami, and tsunami should either have its own threshold column, or reference to the table should be removed from this policy. Including it will give a false threshold for tsunami depths and velocities.</p>	I seek the submission be disallowed.
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 <a href="mailto:developmentplanning@kaiingaora.govt.nz">developmentplanning@kaiingaora.govt.nz</a>	834	834.111	Oppose	<p>We oppose the policy change from 'avoid' to 'discourage'.</p> <p>A Risk based approach to the Qualifying Matter Tsunami Management Area should be taken, where the level of risk is appropriate to the intended use, development, or subdivision. Where the risk is high, we support the original policy wording of 'avoid', rather than 'discourage', which may allow for inappropriate development and intensification within areas at risk from tsunami. The exception to this policy is unless their risk to life and property is acceptable; therefore a risk tolerance assessment will be required to ascertain this acceptance. Any risk tolerance assessment will need to consider the tolerance of the landowner, tenant (if applicable), Council, infrastructure providers, and any other stakeholders that may be affected by the decision.</p> <p>Given the destructive impact/damage potential and unpredictability of tsunami we support the use of modelled 1:500 year tsunami extent for the Tsunami Management Area</p>	I seek the submission be disallowed.

				Qualifying matter (not 1:100 year return period).	
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 (developmentplanning@kaiingaora.govt.nz)	834	834.112	Oppose	<p>We oppose the removal of the mapped Hazard Management Areas within the District Plan.</p> <p>Accurate and risk-based regulatory hazard maps are an important tool in the CCC Plan Change 14 to limit subdivision and development within areas subject to natural hazard risk. Having rules that relate to the mapped hazard or risk extents provides certainty for decision makers and resource consent/private plan change applicants. It also provides information to people on the natural hazards they may face at a certain location. Removing part or all of these regulatory maps opens the possibility that rules controlling development in hazard-prone areas will be inconsistently applied, exposing people and their properties to unnecessary and avoidable risk.</p>	I seek the submission be disallowed
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 (developmentplanning@kaiingaora.govt.nz)	834	834.114	Oppose	<p>We support the original policy of restricting subdivision within the Tsunami Management Area.</p> <p>Accurate and risk-based regulatory hazard maps are an important tool in CCC Plan Change 14 to limit subdivision and development within areas subject to natural hazard risk. Having rules that relate to the mapped hazard or risk extents provides certainty for decision makers and resource consent/private plan change applicants. It also provides information to people on the natural hazards they may face at a certain location. Removing part or all of these regulatory maps opens the possibility that rules controlling development in hazard-prone areas will be inconsistently applied, exposing people and their properties to unnecessary risk.</p>	I seek the submission be disallowed

				Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.	
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 (developmentplanning@kaiingaora.govt.nz)		834.18	Support	Landslides and slope instability are a common, and avoidable natural hazard. We support retaining the Slope Hazard Areas qualifying matter.	I seek the submission be allowed
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 (developmentplanning@kaiingaora.govt.nz)		834.19	Support	Landslides and slope instability are a common, and avoidable natural hazard. We support retaining the Slope Hazard Areas qualifying matter.	I seek the submission be allowed
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 (developmentplanning@kaiingaora.govt.nz)		834.20	Oppose	<p>We oppose the removal of the mapped Hazard Management Areas from the District Plan; and</p> <p>We oppose the reduction of the Tsunami Management Area to a 1:100 year hazard; and</p> <p>Any consequential changes.</p> <p>Accurate and risk-based regulatory hazard maps are an important tool in the CCC Plan Change 14 to limit subdivision and development within areas subject to natural hazard risk . Having rules that relate to the mapped hazard or risk extents provides certainty for decision makers and resource consent/private plan change applicants. It also provides information to people on the natural hazards they may face at a certain location. Removing part or all of these regulatory maps opens the possibility that rules controlling development in hazard-prone areas will be inconsistently applied, exposing people and their properties to unnecessary risk.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities</p>	I seek the submission be disallowed

				<p>where their impact would lead to greater consequences.</p> <p>Given the destructive impact/damage potential and unpredictability of tsunami we support the use of modelled 1:500 year tsunami extent for the Tsunami Management Area</p> <p>Qualifying matter</p>	
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 (developmentplanning@kaiingaora.govt.nz)		834.21	Oppose	<p>We oppose the removal of the mapped Hazard Management Areas from the District Plan; and</p> <p>We oppose the reduction of the Tsunami Management Area to a 1:100 year hazard; and</p> <p>Any consequential changes.</p> <p>Accurate and risk-based regulatory hazard maps are an important tool in the CCC Plan Change 14 to limit subdivision and development within areas subject to natural hazard risk. Having rules that relate to the mapped hazard or risk extents provides certainty for decision makers and resource consent/private plan change applicants. It also provides information to people on the natural hazards they may face at a certain location. Removing part or all of these regulatory maps opens the possibility that rules controlling development in hazard-prone areas will be inconsistently applied, exposing people and their properties to unnecessary risk.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>Given the destructive impact/damage potential and unpredictability of tsunami we support the use of modelled 1:500 year tsunami extent for the Tsunami Management Area</p> <p>Qualifying matter</p>	I seek the submission be disallowed
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051		834.23	Oppose	<p>We oppose the removal of the mapped Hazard Management Areas from the District Plan; and</p> <p>We oppose the reduction of the Tsunami Management Area to a 1:100 year hazard; and</p>	I seek the submission be disallowed



(developmentplanning@kai ngaora.govt.nz)				<p>Any consequential changes.</p> <p>Accurate and risk-based regulatory hazard maps are an important tool in CCC Plan Change 14 to limit subdivision and development within areas subject to natural hazard risk. Having rules that relate to the mapped hazard or risk extents provides certainty for decision makers and resource consent/private plan change applicants. It also provides information to people on the natural hazards they may face at a certain location. Removing part or all of these regulatory maps opens the possibility that rules controlling development in hazard-prone areas will be inconsistently applied, exposing people and their properties to unnecessary risk.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>Given the destructive impact/damage potential and unpredictability of tsunami we support the use of modelled 1:500 year tsunami extent for the Tsunami Management Area Qualifying matter</p>	
<b>Kāinga Ora</b> Brendon Liggett PO Box 74598, New Zealand, 1051 (developmentplanning@kai ngaora.govt.nz)		834.24	Oppose	<p>We oppose the removal of the mapped Hazard Management Areas from the District Plan; and</p> <p>We oppose the reduction of the Tsunami Management Area to a 1:100 year hazard; and</p> <p>Any consequential changes.</p> <p>Accurate and risk-based regulatory hazard maps are an important tool in the CCC Plan Change 14 to limit subdivision and development within areas subject to natural hazard risk. Having rules that relate to the mapped hazard or risk extents provides certainty for decision makers and resource consent/private plan change applicants. It also provides information to people on the natural hazards they may face at a certain location. Removing part or all of these regulatory</p>	I seek the submission be disallowed

				<p>maps opens the possibility that rules controlling development in hazard-prone areas will be inconsistently applied, exposing people and their properties to unnecessary risk.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>Given the destructive impact/damage potential and unpredictability of tsunami we support the use of modelled 1:500 year tsunami extent for the Tsunami Management Area Qualifying matter</p>	
<b>South Shore Residents Association</b> Karina Hay. PO Box 18748, New Brighton, Christchurch, New Zealand, 8641 (ssra.org.nz@gmail.com)	380	380.3	Oppose	<p>We support the original policy intent of using RCP 8.5 and 8.5H+.</p> <p>The RCP 8.5 and 8.5H+ scenarios are the most extreme scenarios of climate change and sea level rise and may not be the most likely eventuality. However, these scenarios have not been disavowed by the IPCC and remain plausible if climate change is not checked within the next century. Some degree of sea level rise is inevitable, and it is appropriate to plan for worst-case scenarios with regards to climate change. Failure to do so now may result in legacy planning issues in the future, and the unnecessary exposure of people and property to coastal hazard risk.</p>	I seek the submission be disallowed
<b>South Shore Residents Association</b> Karina Hay. PO Box 18748, New Brighton, Christchurch, New Zealand, 8641 (ssra.org.nz@gmail.com)	380	380.4	Oppose	<p>We oppose that the Coastal Hazards Qualifying Matter only applies to residential zoned land, i.e., does not include other zones.</p> <p>We support taking a risk-based approach to land use activities. Where that risk is high, we do consider it appropriate to restrict some activities other than residential in areas which are at risk of coastal hazards. Commercial, industrial, rural and other zoned land may contain activities which are vulnerable to coastal inundation, erosion, and tsunami, or activities which may increase the level of risk in a natural hazard event.</p>	I seek the submission be disallowed

<b>South Shore Residents Association</b> Karina Hay. PO Box 18748, New Brighton, Christchurch, New Zealand, 8641 (ssra.org.nz@gmail.com)		380.8	Oppose	<p>We support taking a risk based approach to activities that may be located within the Tsunami Management Area.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of development in at risk areas or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>We support the original policy intent of avoiding development, subdivision and land use that would provide for intensification in areas which are within the Tsunami Management Area.</p> <p>This submission does not define what “reasonable development” would be, and differing interpretations of what level of development is reasonable in areas at risk from tsunami inundation could put people at avoidable risk.</p>	I seek the submission be disallowed
<b>South Shore Residents Association</b> Karina Hay. PO Box 18748, New Brighton, Christchurch, New Zealand, 8641 (ssra.org.nz@gmail.com)		380.9	Oppose	<p>We oppose the deletion of Qualifying Matter Tsunami Management Area.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>We support the original policy intent of avoiding development, subdivision and land use that would provide for intensification in areas which are within the Tsunami Management Area.</p>	I seek the submission be disallowed
<b>South Shore Residents Association</b> Karina Hay. PO Box 18748, New Brighton, Christchurch, New Zealand, 8641 (ssra.org.nz@gmail.com)		380.10	Oppose	<p>We oppose the deletion of Qualifying Matter Tsunami Management Area.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>We support the original policy intent of avoiding development, subdivision and land use that would provide for intensification in areas which are within the Tsunami Management Area.</p>	I seek the submission be disallowed

<b>Environment Canterbury/Canterbury Regional Council</b> Jeff Smith Christchurch Central, Christchurch, New Zealand, 8011 (regional.planning@ecan.govt.nz)	689	689.73	Support	We support retaining the qualifying matters; Flood Hazard Management Areas; Coastal Hazard Management Areas; and Tsunami Management Areas.	I seek the submission be allowed
<b>Environment Canterbury/Canterbury Regional Council</b> Jeff Smith Christchurch Central, Christchurch, New Zealand, 8011 (regional.planning@ecan.govt.nz)	689	689.74	Support	We support retaining the qualifying matters; Coastal Hazard Management Areas; and Tsunami Management Areas.	I seek the submission be allowed
<b>Environment Canterbury/Canterbury Regional Council</b> Jeff Smith Christchurch Central, Christchurch, New Zealand, 8011 (regional.planning@ecan.govt.nz)	689	689.75	Support	We support retaining the Slope Hazard Areas qualifying matter.  This includes supporting the exclusion of subdivision and development in areas subject to erosion of a 'severe' classification from, based on Trangmar's erosion classes. Severe land erosion is a risk to development and subdivision due to the potential impact and damaged caused by developing in highly erosive areas. This would expose people to avoidable risk situations.	I seek the submission be allowed

<b>Environment Canterbury/Canterbury Regional Council</b> Jeff Smith Christchurch Central, Christchurch, New Zealand, 8011 (regional.planning@ecan.govt.nz)	689	689.76	Support	<p>We support the exclusion of subdivision and development in areas subject to erosion of a 'severe' classification from, based on Trangmar's erosion classes. Severe land erosion is a risk to development and subdivision due to the potential impact and damaged caused by developing in highly erosive areas. This would expose people to avoidable risk situations.</p> <p>We support including the upper Halswell River catchment in a qualifying matter area to reduce downstream flooding effects if stormwater infrastructure is inadequate to support further intensification.</p>	I seek the submission be allowed
<b>Environment Canterbury/Canterbury Regional Council</b> Jeff Smith Christchurch Central, Christchurch, New Zealand, 8011 (regional.planning@ecan.govt.nz)	689	689.77	Support	<p>We support the exclusion of subdivision and development in areas subject to erosion of a 'severe' classification from, based on Trangmar's erosion classes. Severe land erosion is a risk to development and subdivision due to the potential impact and damaged caused by developing in highly erosive areas. This would expose people to avoidable risk situations.</p> <p>We support including the upper Halswell River catchment in a qualifying matter area to reduce downstream flooding effects if stormwater infrastructure is inadequate to support further intensification.</p>	I seek the submission be allowed
<b>Transpower New Zealand</b> Rebecca Eng PO Box 17 215 Greenlane, New Zealand, 1546 (environment.policy@transpower.co.nz)	878	878.3	Oppose	<p>We oppose the limitation of the policy to residential development.</p> <p>We consider it appropriate to restrict some development other than residential in areas which are at risk of coastal hazards. Commercial, industrial, rural and other zoned land may contain activities which are vulnerable to coastal inundation, erosion, and tsunami, or activities which may increase the level of risk in a natural hazard event.</p>	I seek the submission be disallowed

<b>Transpower New Zealand</b> Rebecca Eng PO Box 17 215 Greenlane, New Zealand, 1546 (environment.policy@transpower.co.nz)	878	878.5	Oppose	<p>We oppose the inclusion of 'utilities' as a permitted activity.</p> <p>The utility activity should be controlled, unless there is an operational need or functional need and there is no practicable alternative; the risks of damage to the utility are minimised through the implementation of mitigation measures or through supply redundancies within the utility itself; there are significant community benefits from the utility being located within Qualifying Matter Coastal Hazard Management and Qualifying Matter Tsunami Management Areas, that outweigh any resulting consequences from a natural hazard or coastal hazard event.</p>	I seek the submission be disallowed
<b>Winstone Wallboards Limited (WWB)</b> Mark St Clair 5 Cooper Street, Karori, Wellington, New Zealand, 6012 (mark@sctplanning.co.nz)	175	175.6	Oppose	<p>We oppose the policy being restricted to residential zones only.</p> <p>We support taking a risk-based approach to land use activities. Where that risk is high, we consider it appropriate to restrict some development other than residential in areas which are at risk of coastal hazards or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>We support the original policy intent of avoiding development, subdivision and land use that would provide for intensification in areas which are within the Tsunami Management Area. Commercial, industrial, rural, utilities and other zoned land may contain activities which are vulnerable to coastal inundation, erosion, and tsunami, or activities which may increase the level of risk in a natural hazard event.</p>	I seek the submission be disallowed

<b>Winstone Wallboards Limited (WWB)</b> Mark St Clair 5 Cooper Street, Karori, Wellington, New Zealand, 6012 (mark@sctplanning.co.nz)	369	369.3	Oppose	<p>We oppose the restriction to residential purposes in residential zones.</p> <p>We support taking a risk-based approach to land use activities. Where that risk is high, we consider it appropriate to restrict some development other than residential in areas that are at risk of coastal hazards. Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>Commercial, industrial, rural, utilities and other zoned land may contain activities which are vulnerable to coastal inundation, erosion, and tsunamis, or activities which may increase the level of risk in a natural hazard event.</p>	I seek the submission be disallowed
<b>Otautahi Community Housing Trust</b> Ed Leeston PO Box 53, New Zealand, 8013 (ed.leeson@ocht.org.nz)	877	877.14	Oppose	<p>We oppose the policy change from 'avoid' to 'discourage'.</p> <p>A Risk based approach to the Qualifying Matter Tsunami Management Area should be taken, where the level of risk is appropriate to the intended use, development, or subdivision. Where the risk is high, we support the original policy wording of 'avoid', rather than 'discourage', consider that development, subdivision, and land use that would provide for intensification should be avoided within the Tsunami Management Area.</p> <p>Changing the language to "discourage" which may allow for inappropriate development and intensification within areas at risk from tsunamis. The exception to this policy (i.e. unless the risk to life and property is acceptable) has been deleted, which we oppose as if the risk is intolerable, development should not occur.</p> <p>We do not support the alignment of the qualifying matter to 1:100 year return period. Given the destructive impact/damage potential and unpredictability of tsunamis we support the use of modelled 1:500 year tsunami extent for the</p>	I seek the submission be disallowed

				Tsunami Management Area Qualifying matter.	
<b>Otautahi Community Housing Trust</b> Ed Leeston PO Box 53, New Zealand, 8013 (ed.leeson@ocht.org.nz)	877	877.15	Oppose	<p>We oppose the replacement of planning maps with the Council's GIS website, and the mapped hazard return period being decreased to 1 in 100 year event.</p> <p>Accurate and risk-based regulatory hazard maps are an important tool in the CCC Plan Change 14 to limit subdivision and development within areas subject to natural hazard risk. Having rules that relate to the mapped hazard or risk extents provides certainty for decision makers and resource consent/private plan change applicants. It also provides information to people on the natural hazards they may face at a certain location. Removing part or all of these regulatory maps opens the possibility that rules controlling development in hazard-prone areas will be inconsistently applied, exposing people and their properties to unnecessary and avoidable risk.</p> <p>We oppose the deletion of subdivision within the Qualifying Matter Tsunami Management Area. Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>Given the destructive impact/damage potential and unpredictability of tsunami we support the use of modelled 1:500 year tsunami extent for the Tsunami Management Area Qualifying matter</p>	I seek the submission be disallowed



<b>Te Mana Ora/Community and Public Health</b> Hebe Gibson 310 Manchester Street, Christchurch Central, Christchurch, New Zealand, 8013 (submissions@cdhb.health.nz)	145	145.4	Support	We support retaining the Qualifying Matters related to natural hazards, including coastal inundation, coastal erosion and tsunami hazard.	I seek the submission be allowed
<b>Te Mana Ora/Community and Public Health</b> Hebe Gibson 310 Manchester Street, Christchurch Central, Christchurch, New Zealand, 8013 (submissions@cdhb.health.nz)	145	145.3	Support	We support retaining the Qualifying Matters related to natural hazards, including coastal inundation, coastal erosion and tsunami hazard.	I seek the submission be allowed
<b>Carter Group Limited</b> Jo Appleyard Level 5, PwC Centre 60 Cashel Street ,New Zealand,8140 (Jo.Appleyard@chapmantripp.com)	814	814.46	Oppose	<p>We oppose the deletion of rules 5.4A.</p> <p>Rules 5.4A refers to the qualifying matters of Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area. Coastal inundation and coastal erosion are hazards which are going to increase in the near future with the effects of climate change and sea level rise.</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas, or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>We support retaining these qualifying matters because the Coastal Hazard and Tsunami Management Areas support the reduction and mitigation of natural hazard risk to exposed people and property.</p>	I seek the submission be disallowed

<b>Brighton Observatory of Environment and Economics</b> Simon Watts PO Box 18881, New Brighton, Christchurch, New Zealand, 8641 (simon.watts@boee.nz)	53	53.3	Oppose	<p>We oppose the deletion of Tsunami Risk Area as a Natural Hazards Qualifying Matter</p> <p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas or restricting sensitive activities where their impact would lead to greater consequences. We support retaining the Tsunami Management Area Qualifying Matter. This is because of the destructive impact/damage potential and unpredictability of tsunami and the potential for a modelled 1:500 year tsunami event. The 2021 update to the New Zealand National Tsunami Hazard Model indicates that a 500 year return period tsunami is likely to have a maximum amplitude upwards of 4 m in Christchurch City.</p> <p>The Tsunami Management Area should be included as a Natural Hazard Qualifying Matter to support the reduction and mitigation of natural hazard risk to exposed people and property.</p>	I seek the submission be disallowed
<b>North Beach Residents Association</b> Phillip Ridge 44 Marine Parade, North New Brighton, Christchurch, New Zealand, 8083 (northbeachra@gmail.com)	739	739.2	Oppose	<p>We support the original policy intent of using RCP 8.5 and 8.5H+.</p> <p>The RCP 8.5 and 8.5H+ scenarios are the most extreme scenarios of climate change and sea level rise and may not be the most likely eventuality. However, these scenarios have not been disavowed by the IPCC and remain plausible if climate change is not checked within the next century. Some degree of sea level rise is inevitable, and it is appropriate to plan for worst-case scenarios with regards to climate change. Failure to do so now may result in legacy planning issues in the future, and the unnecessary exposure of people and property to coastal hazard risk.</p>	I seek the submission be disallowed
<b>North Beach Residents Association</b> Phillip Ridge 44 Marine Parade, North New Brighton, Christchurch, New Zealand, 8083	739	739.3	Oppose	<p>We support retaining the qualifying matters; Coastal Hazard Management Areas; and Tsunami Management Areas. Coastal inundation and coastal erosion are hazards which are going to increase in the near future with the effects of climate change and sea level rise.</p> <p>UNCLASSIFIED</p>	I seek the submission be disallowed

(northbeachra@gmail.com)				<p>Tsunami are a low probability but very high impact hazard, and their effects can be mitigated by avoidance of intensive development in at risk areas or restricting sensitive activities where their impact would lead to greater consequences.</p> <p>This submission does not define “unduly restrict intensification”. We support a risk based approach to the necessary level of restricted intensification required to avoid development, subdivision and land use that would provide for intensification in areas which are within the Tsunami Management Area. This is necessary because of the destructive impact/damage potential and unpredictability of tsunami risk. “Undue” restrictions would be subjective and lead to differing interpretations of level of development in Coastal Hazard and Tsunami Management Areas</p>	
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Further Submission on a publicly notified plan change to the Christchurch District Plan, Form 6 – Resource Management (Forms, Fees, and Procedure) Regulations 2003