

# Have your say

We welcome your submission on our proposed Housing and Business Choice Plan Change (PC14) and/or proposed Heritage Plan Change (PC13).

If you're having trouble making a submission, we have a Friend of Submitters service available to help. Please [email >>>](#) or call 03 941 6886.

## Written feedback



Fill out an online form by  
11.59pm on Wednesday 3 May 2023  
[ccc.govt.nz/haveyoursay](https://ccc.govt.nz/haveyoursay) (preferred)



Complete the feedback form enclosed  
and drop off at:  
Te Hononga Civic Offices  
53 Hereford Street  
Christchurch  
by **5pm Wednesday 3 May 2023**



Email [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)\*



Post written comments to:  
Freepost 178  
Housing and Business Choice Plan Change/  
Heritage Plan Change  
Christchurch City Council  
PO Box 73016  
Christchurch

**Your feedback needs to include all of the 'required information' in the submission form on the next page.**

## Submissions are public information

Subject to the provisions of the Local Government Official Information and Meetings Act 1987, we will make all submissions publicly available, including all contact details you provide on your submission. If you consider there are reasons why your contact details and/or submission should be kept confidential, please contact The Engagement Manager by phoning 03 941 8935 or 0800 800 169.

[ccc.govt.nz/haveyoursay](https://ccc.govt.nz/haveyoursay)

## Have your say

Housing and Business Choice Plan Change 14  
and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

*\* Required information*Name\*: Jo HorrocksAddress\*: PO Box 790 Postcode\*: 6011Email: resilience@eqc.govt.nz Phone no. \_\_\_\_\_

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name: Toka Tū Ake EQC

Your role \_\_\_\_\_

**Trade competition and adverse effects\*** (select appropriate)☐ I could / ☒ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition? ☐ Yes ☐ No

\* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

**Please indicate by ticking the relevant box whether you wish to be heard in support of your submission\***☐ I wish to speak in support of my submission on Plan Change 13☐ I wish to speak in support of my submission on Plan Change 14☒ I do not wish to speak.**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 submission, please attach them to this form and indicate below\***☒ Yes, I have attached extra sheets. ☐ No, I have not attached extra sheets.**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 Jo Horrocks Date: 09/05/2023

## Have your say

### Housing and Business Choice Plan Change 14

#### My submission is that:\*

*(You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)*

Part of plan change	Support/ Oppose	Reasoning	Decision sought
<p>3.3.7 Objective – Well-functioning urban environment</p> <p>a. A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; including by recognising and providing for;(....)</p> <p>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change</p>	Support with amendment	We support the inclusion of resilience to the effects of climate change into the definition of a well-functioning urban environment. One of the future effects of climate change is likely to be worsening risk from some natural hazards, such as coastal hazards, storm hazards and flooding. Canterbury is at risk from natural hazards that will not be affected by climate change, particularly earthquakes. We therefore request that resilience to natural hazard risk be added to the definition of a well-functioning urban environment.	<p>Retain objective and add the following underlined:</p> <p>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to <u>natural hazards and</u> the current and future effects of climate change</p>
<p>5.2.2.1.1 Policy — Avoid new development where there is unacceptable risk</p> <p>a. Avoid new subdivision, use and development, including new urban zonings, where the risk from a natural hazard is assessed as being unacceptable.</p>	Support with amendment	We support limiting intensification within areas at risk from natural hazards. However, it is important to clearly define what level of risk to life and property is “acceptable” for all natural hazards to avoid confusion and ensure consistent application of rules and policies.	<p>Retain the policy, but formulate and add a definition of acceptable level of risk in regard to natural hazards.</p> <p>An acceptable risk is present where it is generally accepted by society, and the risk posed is commensurate with other risks that are faced daily. When determining if an acceptable risk is</p>

			<p>present, the following criteria shall be considered:</p> <ul style="list-style-type: none"> <li>• Development can occur with limited controls or restrictions; and</li> <li>• Assessment and monitoring of the natural hazard and climate change risks is undertaken to allow increases in risk to be managed.</li> </ul>
<p>5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas</p> <p>a. Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the risk is low or very low based on thresholds defined in Table 5.2.2.5.1a</p> <p>b. Replacement buildings, accessory buildings and extensions/additions to buildings are enabled where effects are mitigated to an acceptable level based on a site specific assessment and having regard to the level and timing of the hazard. This could be by use of an appropriate risk based trigger or alternative methods</p>	Support with amendment	<p>We support limiting intensification within areas at risk from coastal hazards. However, it is important to clearly define what level of risk to life and property is “acceptable” in the case of coastal hazards to avoid confusion and ensure consistent application of rules and policies.</p>	<p>Retain the policy, but formulate and add a definition of acceptable level of risk in regard to coastal hazards.</p> <p>An acceptable risk is present where it is generally accepted by society, and the risk posed is commensurate with other risks that are faced daily. When determining if an acceptable risk is present, the following criteria shall be considered:</p> <ul style="list-style-type: none"> <li>• Development can occur with limited controls or restrictions; and</li> <li>• Assessment and monitoring of the natural hazard and climate change risks is undertaken to allow increases in risk to be managed.</li> </ul>
<p>5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area</p> <p>a. Within the Tsunami Management Area Qualifying Matter, avoid development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable.</p>	Support with amendment	<p>We support the avoidance of intensification within areas at risk from tsunami hazard. However, it is important to clearly define what level of risk to life and property is “acceptable” in the case of tsunami to avoid confusion and ensure consistent application of rules and policies.</p>	<p>Retain the policy, but formulate and add a definition of acceptable level of risk in regard to tsunami hazard.</p> <p>An acceptable risk is present where it is generally accepted by society, and the risk posed is commensurate with other</p>

			<p>risks that are faced daily. When determining if an acceptable risk is present, the following criteria shall be considered:</p> <ul style="list-style-type: none"> <li>• Development can occur with limited controls or restrictions; and</li> <li>• Assessment and monitoring of the natural hazard and climate change risks is undertaken to allow increases in risk to be managed.</li> </ul>
<p>5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area</p> <p>C1, C2, C3: Controlled activity status for replacement of buildings and construction of accessory buildings, and associated earthworks and stormwater management in the Coastal Hazard Medium Risk Management Area,</p> <p>RD1,2,3: Restricted discretionary activity status for replacement of buildings and accessory buildings and associated earthworks and stormwater management in the Coastal Hazard High Risk Management Area, and construction of accessory buildings, and associated earthworks and stormwater management in the Coastal Hazard Medium Risk Management Area,</p> <p>D1: Discretionary activity status for the construction of new buildings in the Coastal Hazard Medium Risk Management Area,</p> <p>NC1: Non-complying activity status for new</p>	Support	<p>We support restricting development and subdivision within areas at medium and high risk from coastal hazards, including inundation from tsunami.</p> <p>We note that it is explicitly stated in the plan change maps that residential density in the Tsunami Management Area is restricted to that permitted or controlled in the Residential Suburban and Residential Suburban Density Transition zones. We suggest that this is made more explicit within the Natural Hazards chapter, and note made to explain how this affects application of the MDRS.</p>	<p>No change to rules and policies requested, but we suggest further explanation given as to how restrictions on development and intensification in coastal hazard zones will affect application of the MDRS.</p>

buildings in the Coastal Hazard High Risk Management Area, NC2: Non-complying activity status for subdivision within Coastal Hazard Medium and High Risk Management Areas. NC3: Non-comply activity status for residential intensification within the Tsunami Management Area.			
6.1A Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3 - Flood hazard management areas - Coastal Hazard Management Areas - Tsunami Management Area - Slope instability management areas	Support	We support the inclusion of flood, coastal, tsunami and slope hazard management areas as Qualifying Matters to reduce the level of enablement of the MDRS and NPS-UD.	No Change
8.5.1.2 C8 Subdivision that creates any vacant allotments within the Medium Density Residential and High Density Residential Zones. The following standards apply: a. Activity standards 8.6.1, and 8.6.3 – 8.6.9, 8.6.12, and 8.6.15. Matters of Control: a. Rule <b>8.7.4</b> and, b. Where relevant, Rules 8.7.7-8.7.11 and 8.7.13; and c. Rule 8.7.12.  C9 Subdivision within the Medium Density Residential and High Density Residential zones	Support	We support hazard constraints being included as matters of control of subdivision to create allotments within the Medium and High Density Residential Zones.	No Change

<p>where no vacant allotments are created and each allotment:</p> <ul style="list-style-type: none"> <li>a. Contains an existing residential unit; and/or</li> <li>b. Is proposed to contain a residential unit, approved as part of a resource consent; and/or</li> <li>c. Is subject to a concurrent resource consent application for a residential unit; except as otherwise specified in Rule 8.5.1.2 C1A and C2A.</li> </ul> <p>Relevant standards apply:</p> <ul style="list-style-type: none"> <li>a. Activity standards in Rules 8.6.3-8.6.9, 8.6.12, and 8.6.15 apply</li> </ul> <p>Matters of control:</p> <ul style="list-style-type: none"> <li>a. Rule <b>8.7.4</b> and,</li> </ul> <p><i>8.7.4.2 Hazard constraints</i></p> <p><i>b. The extent to which any hazard or geotechnical constraints exist on the land and the appropriateness of measures to reduce risk, including liquefaction, flooding, rockfall, cliff collapse and other matters addressed in Chapter 5 (Natural Hazards).</i></p>			
<p>Medium Density Residential Zone extent into Flood Management areas</p>	<p>Support with amendment</p>	<p>Flood hazard risk is predicted to increase in the near future due to rising sea-levels, associated rising ground-water levels, and more frequent and intense rain events. Flooding does not pose high risk to life or to the structural integrity of buildings, but frequent, repeated flood events can have a severe effect on the wellbeing of residents and</p>	<p>Consider restricting density of development in the High and Medium Density residential areas which intersect with the Flood Management overlay.</p>

		<p>incur a high financial cost to businesses and residents due to loss of business, loss of access to buildings, damage to property and furnishings, and clean-up costs (including removing contaminated silt from under houses which can become a health hazard).</p> <p>We support the extent of the modelled Flood Management Areas and note that the threshold for this mapped extent is a greater intensity and lower likelihood flood than the lowest flood level modelled by other territorial authorities. We do not suggest that intensification should not be allowed in this area, but there should be some restriction on density in Medium and High Density Residential Areas which intersect with this overlay, in addition to the required floor level provision.</p>	
<p>5.2.2.2.1 Policy — Flooding</p> <p>b. In the High Flood Hazard Management Area: provide for development of a residential unit on residentially zoned land where the flooding risk is predominantly influenced by sea-level (sic) rise and where appropriate mitigation can be provided that protects people's safety, (sic) well-being and property (sic) from unacceptable risk; (...)</p> <p>In all other cases, avoid subdivision, use or development where it will increase the potential risk to people's safety, well-being and property.</p>	Support with amendment	<p>We support the restriction of development, particularly for the purposes of intensification, in areas at high risk from flood hazards.</p> <p>However, we do not think it is appropriate to allow for lower restriction on development of residential units in areas where the risk of flooding is primarily influenced by sea-level rise. Some amount of sea level rise is expected in the near future with the effects of climate change. Residential properties should therefore not be developed in those areas where sea-level rise will impact them.</p>	Remove "b. In the High Flood Hazard Management Area: provide for development of a residential unit on residentially zoned land where the flooding risk is predominantly influenced by sea-level rise and where appropriate mitigation can be provided that protects people's safety, well-being and property from unacceptable risk"
<p>14.1 Introduction</p> <p>e. A number of the provisions in this chapter give effect to the requirements of the Act and the National Policy Statement on Urban</p>	Support	We support restricting implementation of the MDRS both by use of qualifying matter overlays over the Medium and High Density Residential areas; or by zoning areas at risk from natural	No Change.



<p>Development to provide for intensification in urban areas, including by implementing the Medium Density Residential Standards. However, the Act enables those intensification requirements to be reduced where justified by a “qualifying matter”. In this chapter the reduction in intensification due to qualifying matters has been implemented in two ways: by having the Medium Density Residential or High Density Residential zones , but enabling lesser intensification than the Medium Density Residential Standards require in the areas or sites in those zones where a qualifying matter applies; or by having a lower density residential zone, for example the Residential Suburban or Residential Hills Zone, because the rules for that zone provide the level of density that the qualifying matter necessitates. Further information on qualifying matters can be found in 14.3, How to interpret and apply the rules, sub-clause g.</p>		<p>hazards for lower density development than the Medium or High Density Residential Zones.</p>	
--	--	---	--