

Kōrero mai | **Have your say**

Draft Coastal Hazards Plan Change

Consultation document
For our communities
Preparing for change



Feedback open until
Friday 13 May 2022

ccc.govt.nz/haveyoursay

How we grow

Population growth, housing issues – including housing affordability – and climate change are prompting a re-think of some of Ōtautahi-Christchurch’s planning rules.

We’re proposing a range of changes to our District Plan to provide for our continued growth and prosperity. As well as the Draft Coastal Hazards Plan Change, we have:

- **Draft Housing and Business Choice Plan Change** – to bring our District Plan in line with government direction that has been given via the National Policy Statement-Urban Development (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (The Act) to enable more development in the city’s existing urban footprint.
- **Draft Heritage Plan Change** – we are proposing that 11 new residential heritage areas across the city be identified for protection in the District Plan to recognise Ōtautahi-Christchurch’s special identity and adding around 65 buildings, items and building interiors to the Schedule of Significant Historic Heritage.
- **Draft Radio Communication Pathways Plan Change** – we need to protect airspace used for emergency radio communications by stopping development that blocks it.

From 11 April until 13 May 2022, we welcome your feedback on these draft plan changes. This will help us shape the draft changes needed to bring our District Plan in line with government direction, ahead of formal consultation before 20 August 2022.

Go online for more information and to give your feedback.

ccc.govt.nz/haveyoursay



We need to make changes to our District Plan to avoid new development, land use and subdivision activities being exposed to an increased risk of harm from coastal hazards such as flooding, tsunami, and erosion. We also need to ensure we're meeting our statutory responsibilities to implement national and regional direction in the New Zealand Coastal Policy Statement and the Regional Policy Statement.

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Setting the scene

Communities in low-lying inland and coastal areas around New Zealand and the world are facing challenges with the impacts of climate change and sea-level rise.

Here in Ōtautahi-Christchurch and Te Pātaka-o-Rākaihautū Banks Peninsula we are already experiencing the effects of climate change. The future is expected to bring warmer weather across all four seasons, more days of extreme wind, and more intense rainfall. Climate change is slowly raising the level of the sea. Water expands with heat, so warmer temperatures are causing our oceans to expand. At the same time, these higher temperatures are melting ice sheets and glaciers adding more water to the oceans.

The result is a rise in sea level that will not only affect the open coast, but also allow high tides and the effects of storms to reach further inland. This means that more land may be affected by coastal flooding, erosion and rising groundwater in the future, and the severity of those impacts would likely be greater.

Ōtautahi-Christchurch is more exposed to coastal hazards than any other metropolitan area in New Zealand, including Auckland and Wellington. Across the Ōtautahi-Christchurch District, approximately 25,000 properties are exposed to coastal hazards risks over the next 120 years. The National Institute of Water and Atmospheric Research (NIWA) estimates that with 1 metre of sea level rise, the replacement value of buildings is approximately \$6.7 billion, the majority of which are residential properties.

As a region, Canterbury has around \$1 billion of local government owned infrastructure exposed to coastal hazards, the majority of which is in Ōtautahi-Christchurch.

How the District Plan works now

The Canterbury Earthquake (Christchurch Replacement District Plan) Order in Council 2015 recognised that coastal hazards were not a recovery matter that required an expedited process, so coastal hazard provisions were removed from the 2015 notified District Plan review. Council staff were directed to address this matter separately, and as soon as practicable.

The current District Plan does not define the full extent of areas at risk of coastal hazards and only manages some activities in defined areas. Instead, it relies on the more generic Natural Hazards objective 3.3.6 and policies with activities only managed within areas defined as Flood Management Areas (FMA) and High Flood Hazard Management Areas (HFHMA). For these areas, there are rules to manage subdivision, development, and land use over and above some legacy provisions from the Christchurch City Plan and Banks Peninsula District Plan. These gaps mean we aren't effectively managing risks, and development could occur without appropriate controls in place to minimise risk.

Our proposed plan change

This proposed plan change sets out a risk-based approach that involves managing development, land use and subdivision activities according to the level of risk in that location, acknowledging the uncertainty (of when land may be affected by rising sea levels) and the vulnerability of the activity to risk. It reflects the approach taken to other hazards in the District Plan¹ and is consistent with international risk management best practice².

The proposed plan change gives effect to the Resource Management Act's purpose of enabling people and communities to provide for their social, economic, and cultural well-being and for their health and safety.

It recognises that the level of risk is not the same in every location and enables a responsive approach to the management of development, land use and subdivision within areas of potential coastal hazards.

This proposed plan change has been shaped by community feedback. From 8 October–6 December 2021 we engaged with residents on an Issues and Options Paper for the Coastal Hazards Plan Change. You can read the consultation report, and all feedback received at ccc.govt.nz/plan-change-12.

The objectives we're seeking to achieve from this draft Plan Change reflect those from the Resource Management Act, New Zealand Coastal Policy Statement and Regional Policy Statement:

- 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.
- 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.

The proposed plan change also introduces new policies, rules and methods.

1. Areas identified at a higher risk of river flooding that could cause harm are classified as High Hazard Management Areas. Similarly on the Port Hills, a graduated approach is taken with a more restrictive set of rules applying to properties subject to a higher risk of rock fall, cliff collapse and mass movement compared with other areas where there is a lower risk.

2. ISO 31000: 2009, Risk Management – Principles and Guidelines



How the risk-based approach is applied to land use activities

Generally, the higher the level of risk, the greater the level of control needed to ensure that the risk is appropriately managed. Below is a high-level overview of the level of controls that are proposed to apply to activities across a range of zones.

Enabled Permitted (P) / Controlled (C)	Regulated Restricted Discretionary (RD) / Discretionary (D)	Restricted Non complying (NC) <i>Note that there are no proposed Prohibited activities within the coastal hazard areas.</i>
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Activity	Coastal Inundation Risk Area				Coastal Erosion Risk Areas	
	Very Low	Low	Medium	High	Low	High-Medium / Single zone
Subdivision	RD	RD	NC	NC	NC	NC
Building not otherwise included in this table	P	C	D	NC	D	NC
Replacement residential unit	P	P	C	RD	C	RD
Accessory buildings	P	P	C	RD	C	RD
Additions/extensions to buildings that increase the building footprint at ground level	P	P	C	RD	C	NC
Strategic/critical coastal Infrastructure	C	C	RD	RD	RD	RD
Critical infrastructure – new	C	RD	RD	RD	RD	RD
Infrastructure and utilities – new	C	RD	D	NC	D	NC
Repair and maintenance of infrastructure, utilities and buildings.	P	P	P	P	P	P
Coastal management works – new	C	C	RD	RD	RD	RD
Coastal management works – maintenance (excluding upgrades)	P	P	P	P	P	P
Outdoor storage area and warehousing and distribution activities	C	RD	D	NC (except Lyttelton Port) D (Lyttelton Port)	D	NC
Temporary outdoor storage	P	P	C	D	C	D
Hazard sensitive activities	RD	RD	NC	NC	NC	NC
Recreation facilities (excluding recreation activities)	C	RD	D	NC	D	NC
Recreation activities (excluding buildings and structures used for recreation activities)	P	P	P	P	P	P
Fences	P	P	P	P	P	P
Signage	P	P	P	P	P	P
Demolition of buildings (excluding seawalls and other coastal management work)	C	C	C	C	C	C
Demolition of seawalls and other coastal management work	C	C	D	D	D	D
Earthworks and retaining structures	RD	RD	RD	D	RD	D
All activities not listed above	C	C	RD	NC	RD	NC

Groundwater and tsunami

The proposed Plan Change focuses on risks from coastal flooding and erosion. Areas of rising ground water and tsunami (based on a 1:500 year event) are broadly similar in extent to the areas identified as being at risk of coastal flooding, so we're proposing that they're not mapped separately, and that the effects of these hazards are assessed through the plan's inundation rules.

Objective 3.3.2 of the District Plan seeks to minimise the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice. Consideration is being

given to how the Draft Coastal Hazards Plan Change could help to streamline the plan. This could include removing some of the existing provisions where they can be better addressed through the proposed new methods.

How we are identifying different areas of risk

The identification of different levels of risk is based on work by engineering consultancy, Jacobs with input from Council planners and technical specialists, and peer reviewed by Beca. It draws on data from the 2021 Coastal Hazards Assessment (Tonkin + Taylor). You can view the Risk Based Coastal Hazards Analysis for Land-use Planning study 2021 (Jacobs) and maps showing areas of very low, low, medium and high risk at ccc.govt.nz/plan-change-12.

The maps have been developed at an area-based scale, to establish the concept of the risk-based approach for district planning purposes. They do not provide a property specific level of assessment. We're continuing to refine the methodology for the risk-based approach, including enhancing the mapping, and this work will be done prior to the plan change being formally notified later this year.



Coastal Hazards as a proposed ‘qualifying matter’

As well as the proposed changes to manage the risks from coastal hazards, we’re also consulting on changes to our District Plan to comply with new government direction from the National Policy Statement on Urban Development 2020 (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This direction requires us to enable more housing and business development including within and around the city centre and suburban commercial centres.

The proposed plan change creates a number of residential and commercial zones in the city, within which different heights and densities of development are enabled for housing. Increased commercial development will be enabled in the central city and suburban commercial centres. It’s important to remember, although these changes allow for more housing to be built, this won’t happen city-wide overnight. Our city will gradually evolve as our population grows and demand for more and different types of housing increases. You can find out more about this proposed Plan Change here ccc.govt.nz/pc14

There is some cross-over between the Coastal Hazards Plan Change and the Draft Housing and Business Choice Plan Change. Some areas have qualities, known as Qualifying Matters, which mean rules enabling increased development will not apply, or the level we enable increased development to is limited, and remains subject to resource consent approval. We are proposing that coastal hazards are considered a Qualifying Matter. This is because areas affected by coastal hazards are not suitable for intensification to the extent of other areas – we want to avoid new developments being exposed to an increased risk of harm from coastal flooding, erosion and tsunami.

Decision making process:

- 1 Pre-notification consultation – 11 April to 13 May 2022.
- 2 The Coastal Hazards Plan Change is notified before 20 August 2022 and public can provide submissions.
- 3 Submissions on the notified Plan Change are published.
- 4 Further submissions can be made on the notified Plan Change – late 2022 (to support or oppose previous submissions).
- 5 Independent Hearings Panel conduct hearings – 2023 (The Council can choose to conduct optional pre-hearing mediation).
- 6 Hearings Panel provides the Council with recommendations.
- 7 The Council makes its decision with opportunity for appeals.
- 8 The Coastal Hazards Plan Change becomes operative.



How to have your say

We'd like to hear your feedback on our Draft Coastal Hazards Plan Change. This will help us shape the draft changes needed to bring our District Plan in line with government direction, ahead of formal consultation in August 2022.

Information sessions

Due to the current COVID outbreak we are holding an online session for people wanting to find out more about the Draft Coastal Hazards Plan Change.

- **Coastal Hazards**
Thursday 28 April, 6.30pm–8pm

We are also holding online sessions related to the other changes to our District Plan (Housing and Business Choice and Heritage)

- **Infrastructure (including vacuum sewers)**
Wednesday 20 April, 6.30pm–8pm
- **Heritage & Character areas**
Wednesday 27 April, 6.30pm–8pm
- **Residential intensification**
Monday 2 May, 6.30pm–8pm
- **Commercial intensification**
Tuesday 3 May, 6.30pm–8pm

You can register for one or more of the online information sessions by emailing engagement@ccc.govt.nz

Can't make these meetings?

If there is a community meeting you would like us to attend, please let us know. You can also phone any time to speak with us directly about the plan change on (03) 941 6886.

Written feedback

-  Fill out an online form
ccc.govt.nz/haveyoursay (preferred)
-  Email planchange@ccc.govt.nz
-  Post written comments to –
Freepost 178
Draft Coastal Hazards Plan Change
Christchurch City Council
PO Box 73016
Christchurch
-  Drop the completed feedback form to
Te Hononga Civic Offices, 53 Hereford Street,
Christchurch by **5pm Friday 13 May 2022**

You need to include these details in your feedback:

- Your full name, organisation and your role (if applicable).
- Postal address and daytime phone number.

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 us by phoning (03) 941 8999 or 0800 800 169.

ccc.govt.nz/haveyoursay

Have your say on Draft Coastal Hazards Plan Change

We'd like to hear your feedback on our Draft Coastal Hazards Plan Change. This will help us shape the draft changes needed to bring our District Plan in line with government direction, ahead of formal consultation in August 2022.

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: Male Female Gender diverse

Age: Under 18 years 18-24 years 25-34 years 35-49 years 50-64 years 65-79 years over 80 years

Ethnicity: New Zealand European Māori Pacific Peoples Asian
 Middle Eastern/Latin American/African Other European Other

Save time and do it online ccc.govt.nz/haveyoursay

Discussion questions

1. Have we adequately addressed the risks of potential coastal hazards? Yes No

Comments

2. We are using the 2021 Coastal Hazards Assessment (Tonkin + Taylor) and Risk Based Coastal Hazard Analysis for Land-use Planning report 2021 (Jacobs) to inform the plan change, but are there other sources of information you think we should also consider?

3. Do the draft Objectives, Policies and Rules strike the right balance between managing the risks from coastal hazards while enabling communities to meet their foreseeable needs where it is safe to do so?

4. With the introduction of Coastal Hazards provisions into the District Plan, are there existing rules that could be removed or amended to make the Plan more efficient and effective?

5. Any other comments



Name*

Address* Postcode*

Email

Phone no.

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

Organisation's name

Your role

**required*

We require your contact details as part of your feedback – it also means we can keep you updated throughout the project.

Your feedback, name and address are given to councillors to help them make a decision.

Your responses, with names only, go online when the decision meeting agenda is available on our website.

If requested, responses, names and contact details are made available to the public, as required by the Local Government Official Information and Meetings Act 1987.

If there are good reasons why your details and/or feedback should be kept confidential, please contact our Engagement Manager on (03) 941 8999 or 0800 800 169 (Banks Peninsula).

Please fold with the reply paid portion on the outside, seal and return by 5pm Friday 13 May 2022

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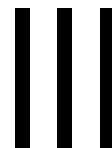
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If you wish to attach extra paper, please ensure the folded posted item is no thicker than 6mm. Alternatively, you can send your feedback in an envelope of any size and address it using "Freepost Authority No. 178"

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