

SUMMARY STATEMENT – WEEKS 9 & 10 – SARAH OLIVER

1. Tēnā koutou katoa, ko **Sarah Oliver** tōku ingoa. I am the City Planning Team Leader within the **Christchurch City Council** (the **Council**). I presented to the IHP on the 10th October 2023 in relation to a strategic overview of PC14 and Strategic Directions.
2. My appearance today relates to qualifying matters for coastal hazards and city infrastructure. I will provide a separate summary statement in relation to the proposed Airport Noise Contour Qualifying Matter when I appear on the 23rd of April.

Coastal Hazard Qualifying Matters

3. The Council documents relevant to the coastal hazards QMs include:
 - (a) Part 2 – Qualifying Matters s32 report¹ specifically sections 6.15 and 6.16;
 - (b) Part 2 – Qualifying Matters s32 report supporting technical reports contained in appendices 6, 7 and 8;
 - (c) My s42A report specifically paragraphs 13.1 to 13.26 in relation to coastal erosion and inundation, and 13.27 to 13.44 in relation to tsunami risk; and
 - (d) My rebuttal evidence paragraphs 46 to 53 in relation to tsunami risk.

Overview of Coastal Hazard QMs

4. Coastal hazards are recognised as a qualifying matter under sections 77I(a) as a section 6 matter, and s77I(b) as a matter to give effect to the New Zealand Coastal Policy Statement (**NZCPS**). The Operative District Plan currently has limited provisions that directly manage land use and subdivision within areas at risk from coastal hazards. Prior to PC14 the Council initiated the development of Plan Change 12² to implement the NZCPS, however PC14 has brought forward the need to identify areas at risk from coastal hazards.
5. As notified, PC14 included:
 - i. A new proposed Policy 5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas (**CHMA**).
 - ii. Proposed Rule 5A to manage within the CHMA, the construction and replacement of buildings and accessory buildings, earthworks and stormwater management areas

¹ [Plan-Change-14-HBC-NOTIFICATION-Section-32-Qualifying-Matters-Part-2.pdf \(ccc.govt.nz\)](#)

² Refer to paragraph 13.8 of Sarah Oliver's s42A report regarding the scope differences between PC12 and PC14.

associated with these buildings, either as a controlled or restricted discretionary activity. If not listed as a permitted or controlled activity, the addition of a new building if located within the Coastal Hazard Medium Risk Management Area to be a discretionary activity, or a non-complying activity if located within the Coastal Hazard High Risk Management Area.

- iii. Within the planning maps (and as part of a new QM series) the spatial identification of CHMA (medium and high risk), and the Tsunami Risk Management Area (**TRMA**). Appendix K of my s42A report includes a series of maps³ that depict the operative zoning, the proposed spatial extents of the CHMAs, and the TRMAs (Notified Proposal and Amended Proposal spatial extent).
6. **Attachment A** to this summary is a consolidated overview of the CHMA and TRMA maps I provided in Appendix K of my section 42A report. One map depicts the CHMA in relation to commercial centres both non-impacted (with associated walkable catchments) and QM impacted. The second overview map depicts the TRMA only and the third map illustrates the difference between the CHMA and TRMA. The number of properties impacted varies across the proposed management areas, with some 14,500 residential and commercial properties located within the CHMA and some 16,200 properties within the TRMA, the difference being approximately 1,700 properties⁴.
7. Following my identification and consideration of various options including those raised by submitters, I have recommended in my section 42A report changes to proposed Policies 5.2.2.5.1 and 5.2.2.5.2 and the Rules in 5.4A so that they no longer impact pre-existing development rights. The revised provisions include a new definition of “residential intensification” to exclude lawfully established activities, or those permitted under the RS and RSDT zones, or by way of a resource consent, all where prior to the operative date of PC14.
8. I recommend changes to the notified coastal hazard policies to mirror other natural hazards policies, so that the first part of the policy directs the mapping of the hazard (based on risk profiles derived from flood depths and sea level rise) and the second part manages activities within the mapped areas.
9. I recommend that the spatial extents of the CHMA and TRMA only apply to relevant residential zones and impacted commercial centres. I also recommend that the spatial extent does not apply to properties that are less than 30% impacted, or an alternative

³ Appendix K maps of most relevance being map numbers 1, 6, 20, 26, 32, 33, 34, 39, 40, 41, 46, 47, and 48.

⁴ Council memorandum Table G: Qualifying Matters Summary of Evaluation Approach, proposed development management method (potentially impacting MDRS and Policy 3 enablement) and Impact on Development Capacity Yield.

approach is to retain the spatial extent of the TRMA but for those properties less impacted (i.e. 70% of their site is unaffected) rezoned to MRZ based on their ability to accommodate medium density development outside of the higher risk area. Whilst the spatial analysis for % of sites impacted has been undertaken, actual changes to the planning maps have not been done at this stage. The GIS mapping exercise that accounts for each site can be done to update planning maps should the panel agree with my recommended zoning approach (or to accommodate any alternative approach the panel considers appropriate).

10. Upon further reflection I also recommend a change to my recommendation in relation to Residential Hill (**RH**) zoned properties partially impacted by the proposed TRMA (refer to **Attachment B** of this summary). I consider retaining the RH zone chapter for only 100 properties is inefficient and unnecessary. These properties can be rezoned as MRZ with the Suburban Hill Density Precinct (in place due to the LPTAA) as the precinct sets the same density of one unit per 650m² as per the RH Zone.

Key s42A and rebuttal points

11. PC14 seeks to give effect to NZCPS Policy 25 which contains a range of management directives "...in areas potentially affected by coastal hazards over at least the next 100 years" including avoiding increased risk of harm and adverse effects and considering the potential effects of tsunami and how to avoid or mitigate them."
12. Effects over at least the next 100yrs within the CHMA could be significant in terms of both harm (life-safety) and material damage to properties and infrastructure. Sea level rise of 0.6m and 1.2m are both plausible, with greater certainty 0.6m SLR will occur within the next 100 years⁵. There is a chance both small local and larger distant earthquakes could occur over the next 100 years giving rise to waves that may range between 3m and 6.5m (as modelled) and inundating greater or lesser spatial extents, with accordingly greater or lesser velocity⁶.
13. My evaluation of the technical evidence⁷ is that those living within the CHMA and TRMA are at an elevated risk when compared to those living in other parts of eastern Christchurch and the wider city. I recommend that greater intensification is focused outside of these 'at risk' areas, being more appropriate to meet the NPS-UD and District

⁵ S32 Technical Assessment Jacobs Risk Based Coastal Hazard Analysis for Land Use Planning Sept 2021 - [Coastal-Hazards-Plan-Change-Risk-Based-Coastal-Hazard-Analysis-Jacobs-17-September-2021-Final.PDF \(ccc.govt.nz\)](#)

⁶ NIWA Land Drainage Recovery programme: Tsunami Study [Tsunami-Study-Final-report-June-19.pdf \(ccc.govt.nz\)](#) (as referenced within the s32 Part 2 refer to section 6.16 [Plan-Change-14-HBC-NOTIFICATION-Section-32-Qualifying-Matters-Part-2.pdf \(ccc.govt.nz\)](#)

⁷ See s32 Part 2 Appendices 6-8, Council evidence of Mr Todd, Mr Debski and Ms Lane.

Plan Strategic Objectives⁸, including achieving sufficient housing capacity (for 30 years and beyond) with the CHMA, TRMA and proposed provisions in place.

14. The RS, RSDT and RMD zone operative provisions⁹ will still provide for a limited level of intensification. Resource consents have been granted for multi-units within the CHMAs but subject to substantive conditions, including requirements to relocate when triggered by specified sea level rise (**SLR**) depths.
15. I accept that redevelopment at greater density and heights may be acceptable within some limited at-risk areas. However, NZCPS Policy 3(1) is to "...Adopt a precautionary approach towards activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse." Through PC12 and its adaptation planning, the Council is continuing to evaluate what is the most appropriate land-use and infrastructure management response within at-risk areas.
16. It is my view that based on the evidence presented, the most appropriate option is to avoid increasing residential densities beyond pre-existing development rights at this time. The alternative will result in placing more people (potentially more vulnerable people), dwellings and property at risk, and possibly requiring Council to invest in new upgraded and/or replacement infrastructure, that cannot be assured to be functional in the long term.
17. The most appropriate option to manage tsunami risk requires the Council and community to draw a line¹⁰ as to what is a tolerable risk and accepting any costs of that decision. Should the decision be to reduce the spatial extent of the proposed TRMA and allow greater residential densities within the 'carved off area', then costs to people and property within this 'carved off area' must be deemed as acceptable following a major event. If or when a large tsunami hits, the impacts will be significant not just during the event but through recovery as well, a scenario this city is still experiencing following the Canterbury Earthquakes.

City Infrastructure Qualifying Matters

18. The City Infrastructure QMs relate to the city spine transport corridor, the wastewater constraint area, electricity transmission corridors and infrastructure, Lyttelton Port overlay and the NZ Rail network interface.

⁸ Christchurch District Plan, Chapter 3 Strategic Directions Objectives.

⁹ See Council's memorandum of 31 October 2023 Appendix 3 which provides an overview of the operative provisions for the Residential Suburban (RS), Residential Suburban Density Transitional (RSDT) and Residential Medium Density (RMD) zones and the existing consenting pathway for residential enablement.

¹⁰ Paragraph 13.34 of Sarah Oliver' s42A

19. In my opinion, the proposed city infrastructure QMs are necessary to achieve good integration of land use and infrastructure, and the efficient and effective use of infrastructure, being core objectives for the City, Greater Christchurch and the Canterbury Region¹¹. The city infrastructure QMs are specifically designed to manage the interface between urban activities and infrastructure, residential amenity and avoid reverse sensitivity effects.
20. I address the city infrastructure QMs between paragraphs 12.82 to 12.121 of my s42A report. I considered a range of options including no limitations on MDRS or Policy 3 enablement, and variations in relation to building setbacks and dwelling density (underlying zoning).
21. I recommend retaining the operative building setback rules for the City Spine, Electricity Corridors, and NZ Rail Network QMs. For the Wastewater Constraint Area QM I recommend retaining existing subdivision rules relating to wastewater servicing constraints¹² where new development that discharges wastewater into the vacuum sewer is a restricted discretionary activity.
22. Within the Lyttelton Port Overlay QM I recommend retaining rules permitting minor extensions and replacements of existing residential units (subject to limits) and any new noise sensitive activities as a non-complying activity limited notified only to Lyttelton Port Company (**LPC**). Mr Purves (LPC's planning expert) provides a further summary of the rules in paragraphs 40-43 of his evidence. I have discussed in paragraphs 31 and 32 of my rebuttal evidence, the LPC submission requesting an additional Inland Port Influence QM requiring noise insulation for residential properties within close proximity to the Inland Port. Whilst there is potential merit in requiring noise insulation standards, I defer to Ms Ratka's Industrial Interface QM recommendations under her s42A report specifically paragraphs 7.7.35 – 7.7.39, 7.7.54 – 7.7.60 addressing the most appropriate rules to manage medium density enablement. It is however my recommendation not to impose any new noise insulation requirements for residential activities currently permitted or controlled under the operative plan.
23. The City Spine Transport Corridor qualifying matter (**CSQM**) has drawn an opposing submission from Kāinga Ora¹³ which I discuss in 12.104 to 12.121 of my s42A report and paragraphs 41 to 45 of my rebuttal evidence. There are two maps in Appendix J of

¹¹ S42A report of Sarah Oliver, section 11.6

¹² Christchurch District Plan, Chapter 8, Rules 8.4.1.3 Servicing constraints and 8.6.8 Wastewater disposal activity standards

¹³ Submitters #834

my s42A report which have the wrong colours for the MRZ and HRZ zones. **Attachment C** to my summary are replacement maps with the zoning colours corrected.

24. The City Spine QM relates to a core public transport route connecting major centres from the north to the west and the city to the neighbouring districts of Selwyn and Waimakariri. It is planned as a city-shaping corridor to attract the greatest population densities and major growth in business activity. This is a very targeted infrastructure QM¹⁴ applying only to where road widths are 24m or less, managing building layout to ensure adequate space is available for tree planting along the road frontage.
25. For residential areas the CSQM proposes within the MRZ¹⁵ and HRZ¹⁶ a 4m building setback being greater than the 1.5m building setback under the MDRS. It also proposes to manage the height and transparency of fencing along the road boundary and requires outdoor living spaces within the front yard to be setback 1.5m from the road boundary. For commercial zones¹⁷ the proposed QM proposes a 1.5m setback, being less than that currently required under some operative standards¹⁸. The business setback rule requires that fences do not exceed 1m in height and outdoor living spaces be setback 1.5m from the road boundary.
26. Some submitters seek deletion of the CSQM and no change to the MDRS building setback of 1.5m. However, it is my opinion that this targeted QM is the most appropriate and effective option to achieve a minimum level of amenity along this important and city shaping corridor. Street outcomes with the increased setback will help retain existing tree canopy, provide adequate space for new trees, and maintain sunlight access and generally more openness along the corridor.
27. As discussed in my strategic overview¹⁹, the greatest challenge for Ōtautahi Christchurch is the realisation of the greatest densities and employment growth in locations such as the City Spine. Whilst the proposed setback does require consideration of the site layout, it will only have a minor impact on development capacity. In my view it is more appropriate that this interface be managed in a positive way to attract development and investment, resulting in a considerably more liveable urban environment and one not dominated by hard infrastructure and buildings.

¹⁴ S42A Sarah Oliver Appendix J

¹⁵ Proposed Rule 14.5.2.18

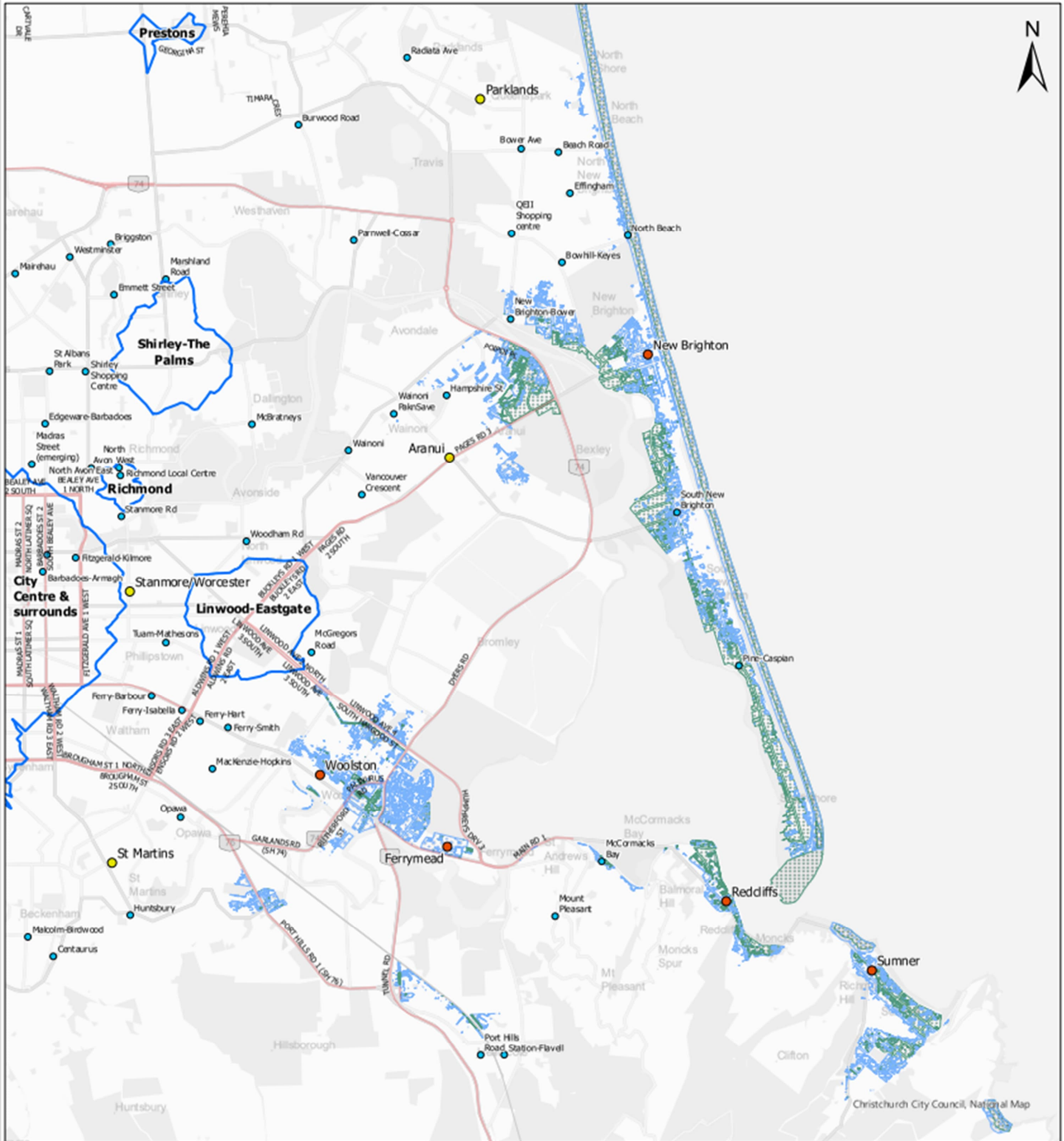
¹⁶ Proposed rule 14.6.2.17

¹⁷ Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone, Large Format Retail Zone, Mixed Use Zone

¹⁸ Operative rule 15.4.2.3 requires a 3m setback for sites not identified as a "Key pedestrian frontage" on the planning maps.

¹⁹ S42A report of Sarah Oliver, paragraph 12.106

Proposed Plan Change 14: Qualifying Matter - Coastal Hazard Areas



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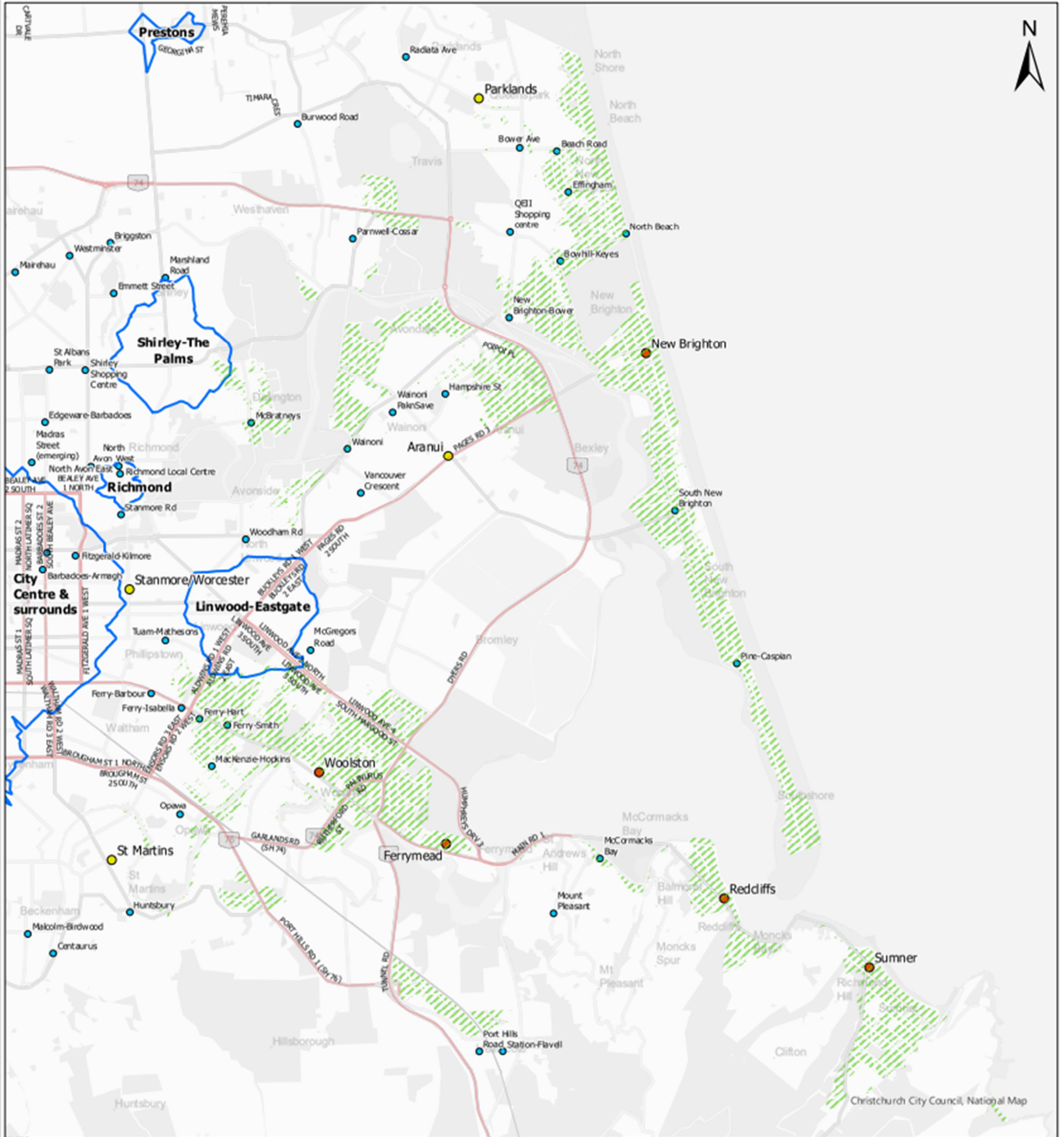
0 0.5 1 2 3 4 Kilometers

Legend

- QM-Affected Commercial Centres
- LCZ Centres - MDRS Only
- Policy 3 Walkable Catchments
- Major Arterial
- Coastal Hazard Medium Risk Management Area
- Coastal Hazard High Risk Management Area

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Proposed Plan Change 14: Qualifying Matter - Tsunami Management Area



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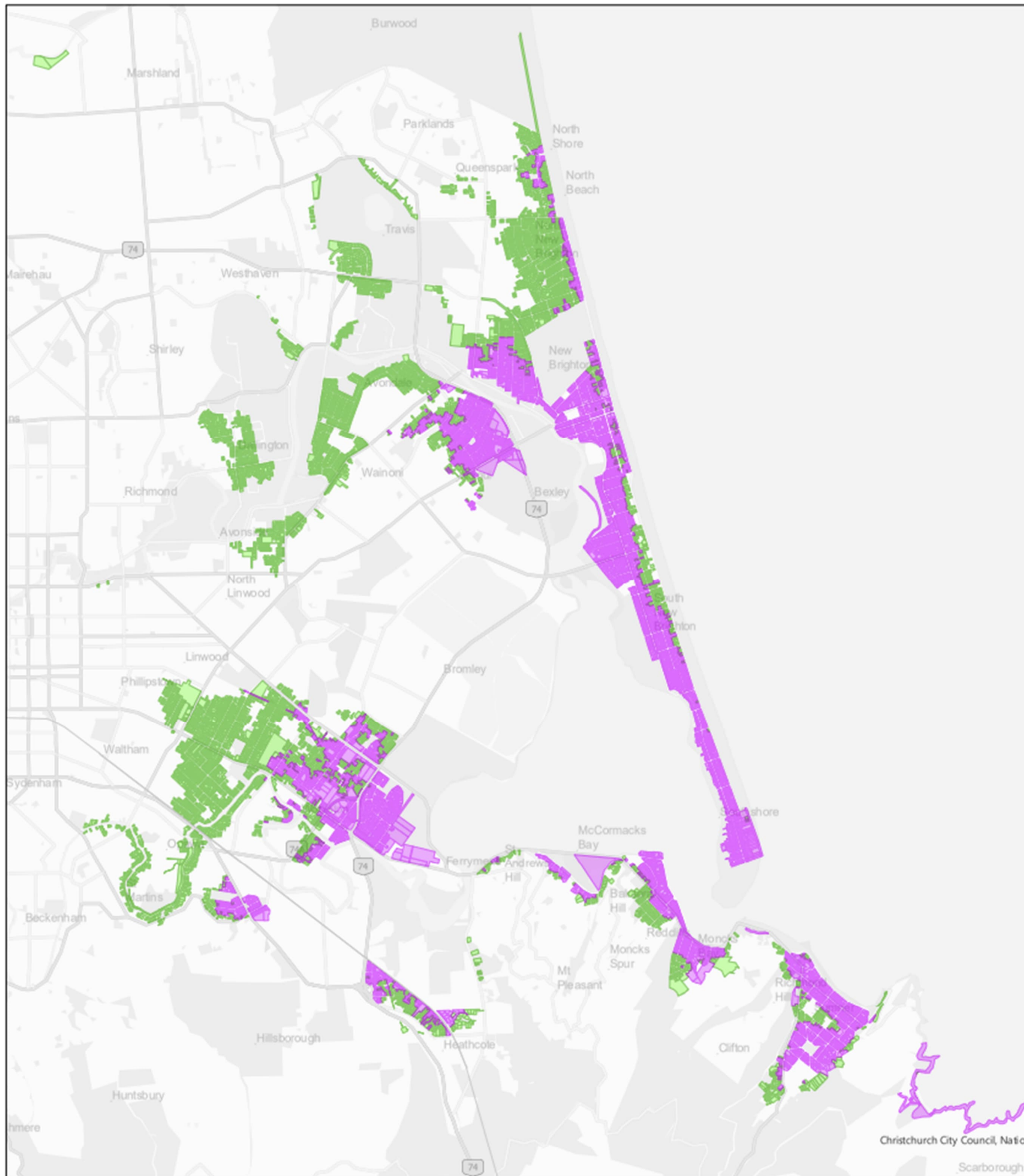
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- QM-Affected Commercial Centres
- LCZ Centres - MDRS Only
- NCZ Centres - MDRS Only
- Policy 3 Walkable Catchments
- Major Arterial
- Tsunami Management Area

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Proposed Plan Change 14:

Tsunami Management Area & Coastal Hazard Management Area - Parcels



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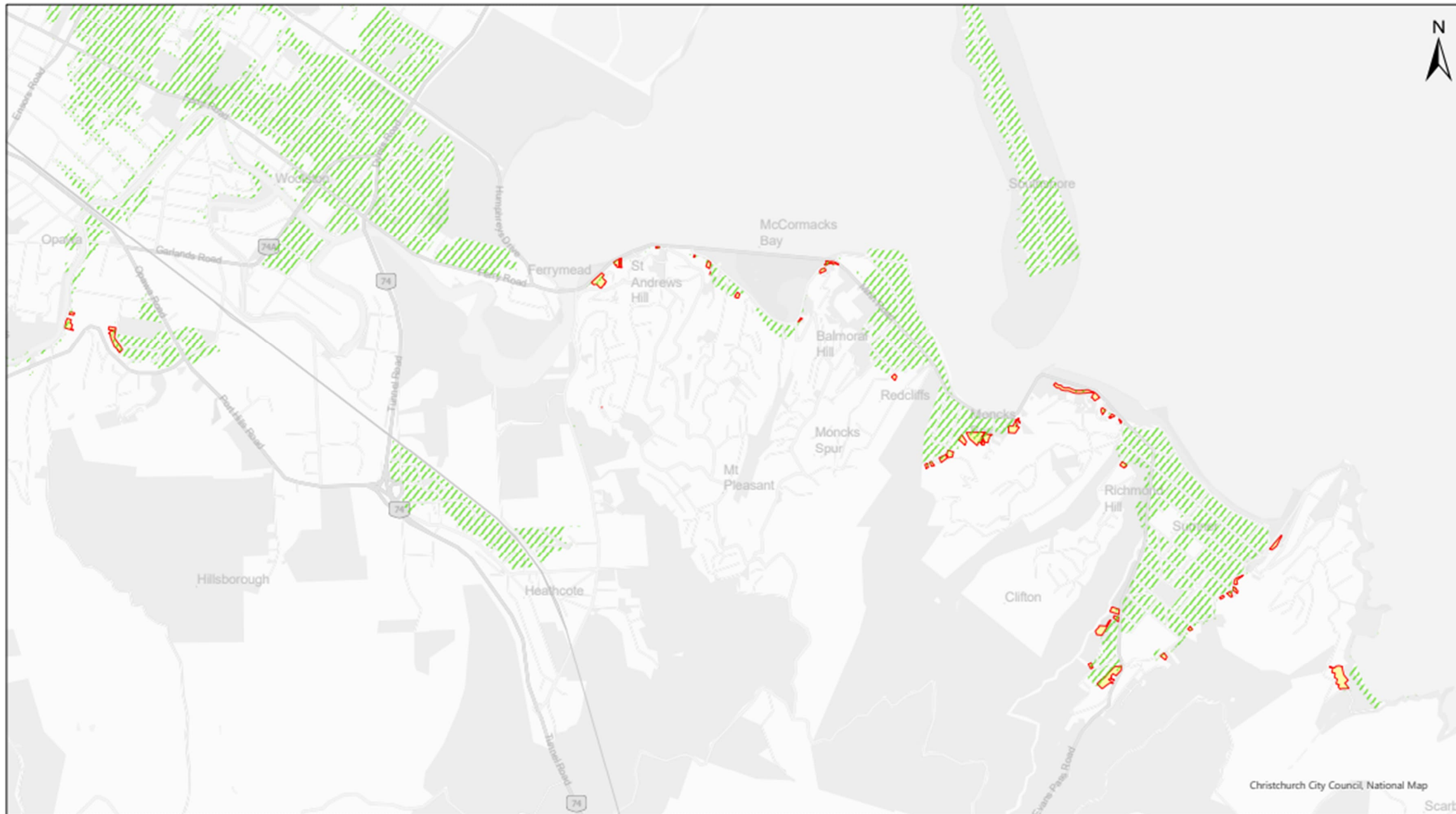
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Legend

- TMA Only Parcels
- TMA and CHMA Parcels (medium & high risk)

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Plan Change 14: Tsunami Management Area & Residential Hill Zoning



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| Qualifying Matter | | CCC Zoning | |
|-------------------|-------------------------|------------|-------------------|
| | Tsunami Management Area | | Residential Hills |

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Attachment C – Updated City Spine maps with Amended Proposal zone extents

