

**Concise statement of views by strategic partners, Regenerate Christchurch and DPMC (s66(2)(b) of GCRA) on draft section 71 proposal – Residential Unit Overlay District Plan Changes**

Organisation	Summary of feedback / matters raised
Regenerate Christchurch	1. Considers that the proposal meets the purposes of the Greater Christchurch Regeneration Act 2016 (GCRA) as it provides more certainty to the affected communities and enables them to rebuild their homes if the known risks are mitigated.
	2. Accepts that these provisions reduce uncertainty for property owners in affected areas, agrees with the approach taken and the proposed amendments to the District Plan, and considers it appropriate that the Council proceed with the proposal in accordance with sections 67 and 68 of the GCR Act, subject to the consequential matters discussed in 3 and 4 below.
	3. Recommends that Council prepares a Practice Note for consents staff and put in place a Quality Assurance process for advice provided and decisions made under this policy in order to ensure consistent application of the amended Policy and Rule 5.4.6.2 RD2.
	4. Considers that Council should monitor whether there is evidence which shows that mitigation of flood risk is not possible for particular properties, to inform future strategic approach to the issue
	5. Acknowledges that the IHP considered affected areas in the Residential Unit Overlay are areas where the evidence showed appropriate mitigation of flood risk is possible, but advises caution in anticipating when flooding because of sea level rise will be a relevant risk.
	6. Notes that the impacts of sea level rise on the wider community in Southshore and South New Brighton will be considered through the Southshore and South New Brighton Regeneration Strategy currently being prepared, which will be taking an adaptive management approach. This will include consideration of the effects on the provisions of services as groundwater levels rise.
	7. Notes the damage to local commercial services in the area which is out of scope of this project, but recommends Council considers (through a separate process) a more permissive activity status to allow these small commercial sites to redevelop
Department of the Prime Minister and Cabinet	8. Considers the draft proposal is concise and applies to a discrete matter to rectify an oversight in the Christchurch District Plan and meets the requirements of section 65(2) of the GCRA
	9. Notes the views provided are those of the Chief Executive of the Department of the Prime Minister and Cabinet, not the Minister for Greater Christchurch Regeneration
Canterbury Regional Council	10. Consider that the amendments to the policy and rule will provide clarification that replacement of residential units in the Residential Unit Overlay can occur.

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(Environment Canterbury)	11. Notes Environment Canterbury's main interest in the proposal relates to our responsibility under the Resource Management Act 1991 to administer the Canterbury Regional Policy Statement (CRPS).
	12. Suggests consideration of including conditions on the permitted activity rule to require appropriate hazard mitigation in the design of a dwelling.
Te Rūnanga o Ngāi Tahu	13. Notes the proposed changes do not directly impact any matters of cultural significance to manawhenua and do not raise any issues in respect of objectives and policies within the Mahaanui Iwi Management Plan 2013.
	14. Suggests those seeking to build in areas where vulnerability to sea level rise has been identified need to be fully informed by Council of associated risks, and council need to be confident about management of those risks when authorising development.
	15. Recommends the proposed amendments to the District Plan should not create any longer term issues and costs to the Council, or conflict with development of a comprehensive climate change adaptation strategy for the city.
	16. Generally supports any changes to the Operative Plan that clarify its intent and improve administration
	17. Notes that Te Runanga o Ngai Tahu (TRONT) are generally supportive of a role for a Climate Change Commission in addressing issues associated with adapting the built environment and infrastructure to changing conditions, particularly associated with flooding and inundation. New legal and institutional arrangements may inform future management of vulnerable areas within the City. Overall, TRONT takes an intergenerational perspective on these matters, and are mindful of legacy issues.
	18. Notes recent advice on the Southshore and South New Brighton Regeneration Area which recommended that any plans for adaptation to climate change over time should result in the reinstatement of a natural environment, in preference to adopting artificial or engineered solutions.
Selwyn District Council	19. No specific comments on this proposal at this time.
Waimakiriri District Council	20. No objection to these Plan Changes proceeding, given the specific and unusual circumstances arising in this instance in relation to the Christchurch District Plan at this time.