

## **Concise Statement of Comments under Section 34**

In accordance with the requirements of section 34(1) of the Act, between 14 November 2018 and 19 December 2018, Regenerate Christchurch invited the public to provide written comments on the draft Plan. During that period, a total of 2120 written comments were received.

### ***Flatwater Facility***

Of the total 2120 comments, 1919 supported the inclusion of flatwater facilities within the Area.

The comments relating to a proposed flatwater facility in the Area were generally advanced on the basis that the Plan excluded such a facility from the Area. A number of land use combinations which included a flatwater facility (both "in river" and "out of river") were considered using the multi-criteria analysis. On that analysis none of the shortlisted combinations which included a flatwater facility were determined to be the best overall for the Area and as such, a flatwater facility was not included as a preferred land use and activity in the draft Plan. However, the proposed amendments to the Christchurch District Plan (as set out in Appendix One and made available for public comment with the draft Plan) provide that resource consent for a flatwater facility may be sought as a discretionary activity within the Area.

A number of public comments noted that the draft Plan failed to adequately acknowledge the existing use of the Ōtākaro Avon River for flatwater sports and the contribution that flatwater sports had made to the Area over time. That omission from the Plan was acknowledged and amendments proposed to address this.

Comment received from flatwater sports clubs raised concern that neither the proposed 80m x 1000m widening of the Ōtākaro Avon River nor the festival short-course would meet the identified need to enhance facilities, reduce congestion and increase the safety of water sports participants. Although the clubs considered that some widening and deepening of the river in selected locations would enhance the river for flatwater sports while still ensuring that the ecological outcomes of the Plan were not compromised, the appropriate location(s) for that are not yet known.

Other comments identified potential safety concerns for flatwater sports participants regarding the positioning and use of the landings (particularly the Avondale and Wainoni Landings), and the location of the City to Sea path (with reference to its use for shore based coaching).

### ***Landings***

Public comment noted that some landings were incorrectly named given their geographical locations.

### ***Governance/Implementation***

By volume, the second most significant issue raised by public comment related to the perceived uncertainty surrounding the future governance, funding and implementation of the Plan. Those comments generally sought greater clarity in this regard and expressed a desire to see implementation of the Plan in a shorter time period than the 30 years indicated.

### ***Residential***

Concerns were raised regarding the integration of edge housing with existing neighbourhoods particularly in view of the city-wide requirement in the Christchurch District Plan to raise floor levels in new dwellings to mitigate flood hazard.

### ***Eco-Sanctuary***

A number of comments were made in support of an eco-sanctuary within the Area. In particular, "permitted activity" status for such a development was sought.