

PLANNING MEMORANDUM

To	Gina Sweetman, Chair of Hearing Panel, Amy Robinson, Hearing Panel Member and Megan McKay, Hearing Panel Member	From	Jess Bould Town Planning Group on behalf of Christchurch City Council as applicant
Copy	Janice Carter, Consultant Processing Officer on behalf of Christchurch City Council Olivia Murray, Consent Processing Officer, Canterbury Regional Council	Reference	3407-25
Date	5 November 2025	Pages	4 + Attachment
Subject	Summary of Changes to Application: RMA2023/3243 and CRC242267, CRC242268, CRC242269 and CRC251999		

1 PURPOSE

The purpose of this memo is to formally advise of the key changes made to the resource consent applications seeking to authorise the establishment of erosion protection and inundation protection structures along the Avon-Heathcote Ihutai Estuary edge. This memo relates to the following resource consent applications lodged with Christchurch City Council (CCC) and Canterbury Regional Council (CRC):

- **CRC242267:** to use land for earthworks and vegetation clearance within 10 m of a natural inland wetland
- **CRC242268:** to disturb the foreshore and seabed, deposit material on the foreshore and seabed, to erect a structure on the foreshore and seabed, to occupy the Coastal Marine Area and to reclaim the Coastal Marine Area
- **CRC242269:** to discharge construction phase stormwater within 10 m of a natural inland wetland and to discharge contaminants to land.
- **RMA/2023/3243:** to undertake works along the Avon-Heathcote Ihutai Estuary edge to construct erosion and inundation structures, which include gabion baskets, cobble beaches, rock revetments and inundation bunds.

An additional consent, CRC251999 (discharge of contaminants to air), is part of this application bundle but is not materially affected by these amendments.

2 BACKGROUND TO CHANGES

These changes have been developed in response to feedback received from CCC and CRC during the application process, including formal requests for further information. The changes are assessed as non-material or minor and fall within the scope of the original application. All amendments have been discussed with CCC and CRC in advance.

3 KEY CHANGES

The following changes have been proposed and are set out in further detail in the subsections below:

- Reduction in duration of resource consent sought.
- A landward shift of the proposed edge structures, largely reducing the need for reclamation of the Coastal Marine Area (**CMA**). This includes relocation of parts of the inundation bund, cobble beach and rock revetment area, within the originally identified project footprint.
- Replacement of the proposed Saltmeadow offset with on-site remediation, meaning effects can be managed within the project footprint. This is assessed in the updated Ecological Impact Assessment.
- Reduction in the number of formal access points to the Avon-Heathcote Ihutai Estuary.
- A revised edge protection methodology along the South New Brighton Park frontage, by way of a 'soft edge' concept which allows for the naturalisation of the edge through managed erosion.

3.1 REDUCTION IN DURATION OF RESOURCE CONSENT

The consent application as lodged sought a 35-year consent duration for enduring occupation of the proposed structures. The Council (as applicant) since revised the requested duration of the consents to 20 years, which aligns with the design life of the structures.

In response to concerns raised by CRC technical specialists about the abandonment of structures at the expiry of the resource consent, the Applicant has proposed a condition of resource consent that requires all authorised structures to be either removed or reconsented at the end of the term. This condition will also require the preparation of a decommissioning plan. The Applicant acknowledges that further resource consents may be required to authorise future decommissioning works.

3.2 CHANGE TO THE POSITION OF EDGE STRUCTURES

The application originally sought to encapsulate existing retaining wall and coastal erosion protection structures in places. Based on feedback from CRC, the Applicant has amended the application to provide for the removal of all existing structures and begin the edge protection measures from this point. As a result, most of the reclamation proposed is no longer required.

Three necessary exceptions were discussed with CRC. Small areas of reclamation are still required in the following locations:



- Adjacent to 44A Rocking Horse Road, due to the proximity of the proposed shared pathway to the dwelling.
- Between CH0 and CH190 at South New Brighton Park, where gabions are required to protect a midden site, as requested by Mana Whenua.
- Adjacent to South New Brighton Park, between CH235 and CH405 where the soft beach area is proposed. Further development of this concept is occurring, with concept sketches included as **Attachment X**.

The inundation bund will be shifted landward to accommodate this change.

3.3 REDUCTION IN ACCESS POINTS

In response to feedback from CRC and CCC regarding the number of proposed access points, the number of formal access points has been reduced to three, located at the ends of Tern Street, Godwit Street and Penguin Street. These locations were selected due to seagrass being over 20m away from the access point. As part of this change, the previously proposed Tern Street jetty has been removed and replaced with stepped access slightly to the south. This was confirmed via an RFI process.

Access points were requested by the community via the consultation process. Access to the Avon-Heathcote Estuary is important to this community to provide recreational and mahinga kai access, and it is noted that this proposal represents a substantial reduction from the current number of informal access points.

3.4 EDGE PROTECTION AT SOUTH NEW BRIGHTON PARK

During a site visit with CRC technical specialists, the edge area adjacent to South Brighton Holiday Park was identified as a suitable location to implement an alternative edge protection solution. CRC indicated support for a 'soft edge', where the slope could be eased back to remove the erosion scarp, and planting introduced to further stabilise the edge. This location was identified as being suitable due to the large setback to the Holiday Park.

Following the site visit, the Applicant engaged a coastal engineer to provide a high-level concept, which was presented to the CCC and CRC for technical feedback. CRC provided mixed commentary in response to the concept, including a favourable response from a coastal processes' perspective. CCC has not yet provided a specific technical response.

The Applicant has decided to progress the 'soft edge' for this part of the project. The original cobble beach option has been retained as a contingency option should the soft edge prove unsuccessful. Proposed consent conditions will include monitoring, reporting requirements and clear triggers for implementing the contingency plan. Further details and expert evidence on this approach will be presented as part of the hearing.

4 SUMMARY

The proposed amendments respond to technical feedback from council specialists and are intended to improve environmental outcomes while balancing community objectives. The

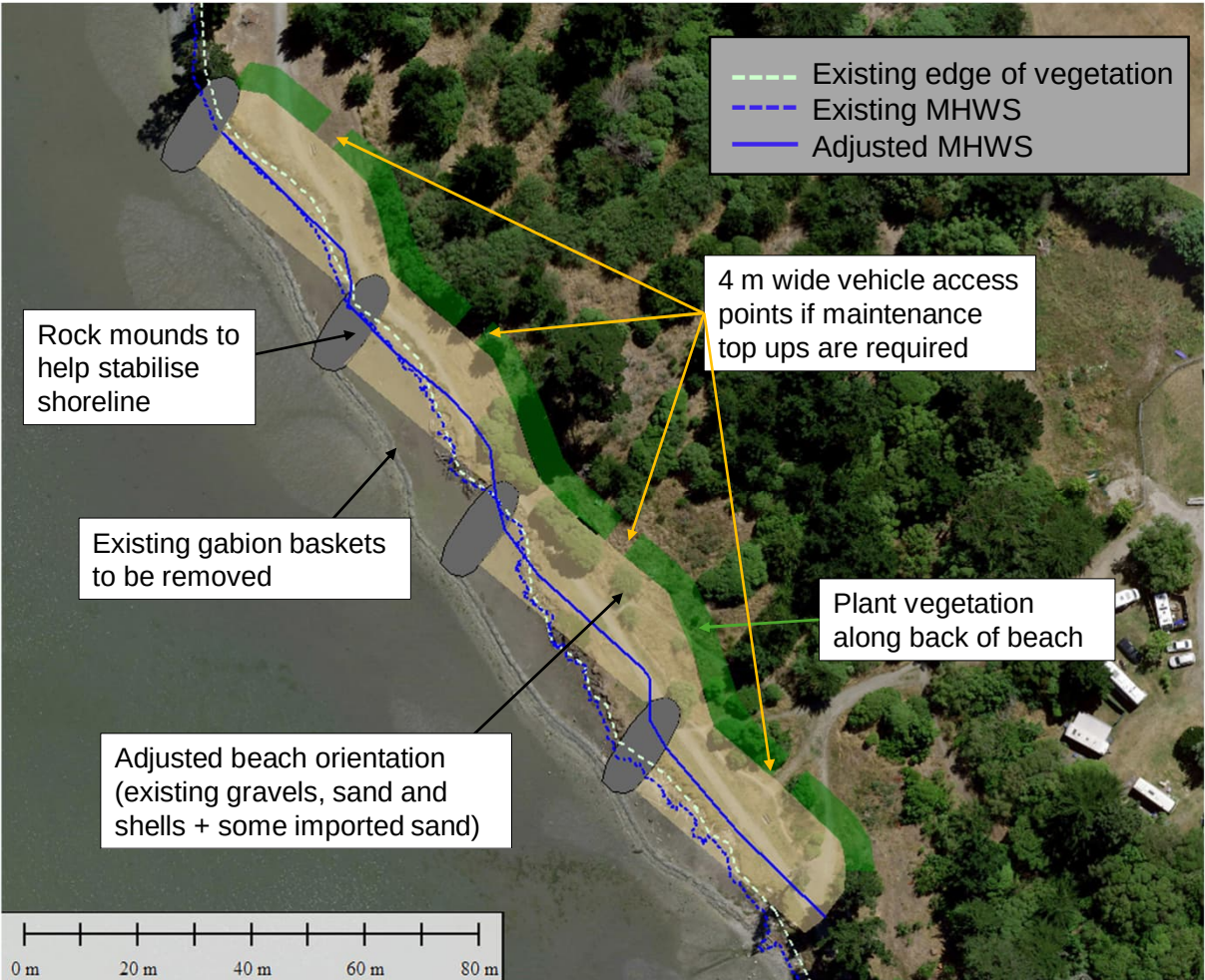


changes, which primarily relate to design details and methodology are assessed as being within the scope of the original application. The changes do not create a materially different proposal and do not give rise to new adverse effects. To the contrary, the changes have been proposed in response to comments made by the consent authorities regarding the original proposal and will result in an overall reduction in adverse effects. Further assessment of the activity's potential effects in light of these modifications will be provided in the applicant's evidence.



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	Area (m ²)
Reno mattress	331
Seabed landward of reno	1450
Total CMA occupation of works	700
Sand CMA occupation	400
Rock CMA occupation	300
Land converted to beach	2500
Land converted to CMA	583



Notes:
1. ALL DIMENSIONS ARE IN METERS UNLESS STATED OTHERWISE.
2. ALL LEVELS WITH RESPECT TO NEW ZEALAND VERTICAL DATUM (RL).

DRAFT CONCEPTUAL SKETCH



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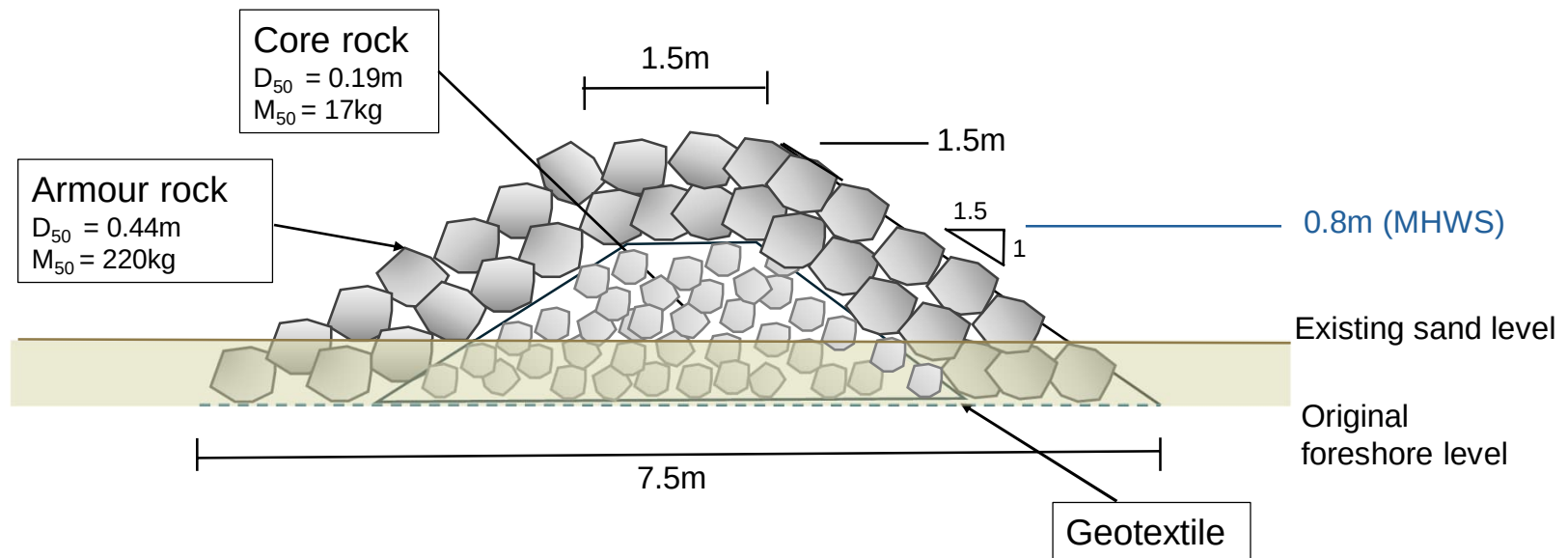
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CHECKED	RRH	Oct 25
APPROVED	RRH	Oct 25
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APPROX. SCALE (AT A3 SIZE)		
AS SHOWN		
PROJECT No.		
1099575		

SOUTHSHORE EDGE PROTECTION
SOFT EDGE CONCEPT SKETCH
PLAN VIEW

FIG. No. Figure 1

REV. 0

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TYPICAL ROCK GROUYNE SECTION

NOT TO SCALE

Notes:

1. ALL DIMENSIONS ARE IN METERS UNLESS STATED OTHERWISE.
2. ALL LEVELS WITH RESPECT TO NEW ZEALAND VERTICAL DATUM (RL).

DRAFT CONCEPTUAL SKETCH



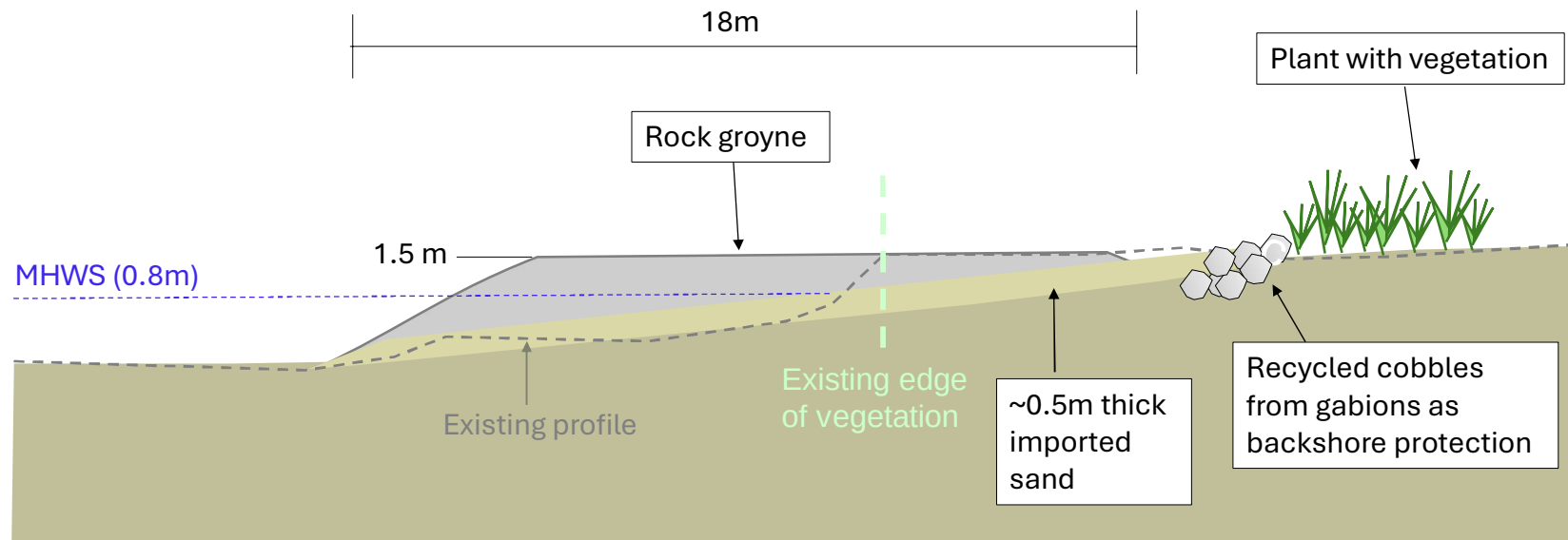
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SOUTHSORE EDGE PROTECTION
SOFT EDGE CONCEPT SKETCH
CROSS SECTION

FIG. No. Figure 2

REV. 0

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TYPICAL ROCK GROUYNE + BEACH SECTION

NOT TO SCALE

Notes:

1. ALL DIMENSIONS ARE IN METERS UNLESS STATED OTHERWISE.
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DRAFT CONCEPTUAL SKETCH



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SOUTHSHORE EDGE PROTECTION
SOFT EDGE CONCEPT SKETCH
CROSS SECTION

FIG. No. Figure 3

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