

**BEFORE A PANEL OF INDEPENDENT HEARING COMMISSIONERS
APPOINTED BY ENVIRONMENT CANTERBURY AND CHRISTCHURCH
CITY COUNCIL**

IN THE MATTER of the Resource Management Act 1991(the **Act**)

AND

IN THE MATTER of Resource Consent applications CRC242267,
CRC242268, CRC242269, CRC242269 and
RMA/2023/3243 by Christchurch City Council (**the
Applicant**) for Southshore and South New Brighton Park
Estuary Edge Project

**STATEMENT OF EVIDENCE OF SUSAN JANE MCMANAWAY
ON BEHALF OF CHRISTCHURCH CITY COUNCIL
(LANDSCAPE)
Dated: 21 November 2025**

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1. SUMMARY OF EVIDENCE

- 1.1 This evidence is given in respect of the resource consent applications by Christchurch City Council (CCC) for the construction and operation of erosion and inundation protection works along the Southshore estuary edge for the purposes of flood management (the Project).
- 1.2 My evidence addresses the potential effects on natural character, landscape and visual effects of the Project.
- 1.3 The Project Site and Landscape Masterplan Footprint are within the Coastal Environment while designed to largely avoid the estuary which is an Outstanding Natural Feature (ONF) and an area of High Natural Character. There will be minor incursions in a few localised areas, largely during the construction process.
- 1.4 While largely unconsented, the deteriorating, 'ad hoc' erosion protection structures along Southshore are part of the existing landscape, including influencing natural patterns and processes and are considered to form part of the existing environment in my assessment.
- 1.5 Effects on natural character at the broader area scale are considered very low given the negligible change to the overall level of modification apparent in the context of the spit and southern estuary edges.
- 1.6 There will be low-moderate temporary adverse effects on natural character within the Construction Footprint during construction. Once completed, adverse effects on natural character values will be very low due to a net gain of mudflat habitat and the proposed coastal planting set out in the Landscape Masterplan.
- 1.7 Effects on landscape values will be low-moderate during construction. Once completed, effects on landscape values as a result of the proposed works will be very low. The proposed inundation works will create low-profile structures that will be integrated into the existing modified open space setting with a planned landscape response that includes coastal planting and estuary access. The legibility, formative processes and habitat values associated with the outstanding natural landscape values of the estuary will be maintained.

- 1.8 There will be a range of visual effects as a result of the Project. Visual effects during construction will range up to low-moderate from adjoining properties and moderate from 44A Rocking Horse Road and will be temporary. Once the project is completed, visual effects on surrounding public and private viewpoints will be no more than low.

2. INTRODUCTION

- 2.1 My full name is Susan Jane McManaway.
- 2.2 My evidence relates to the natural character, landscape and visual effects of the Project.
- 2.3 I co-authored the *Southshore Erosion and Inundation Protection Works: Landscape Effects Assessment* report, dated 27 November 2023 (LEA) which formed part of the Assessment of Environmental Effects (AEE) that accompanied the applications to Canterbury Regional Council (CRC) and Christchurch City Council (CCC).¹
- 2.4 Following lodgement of the application, CCC asked the Boffa Miskell landscape team to respond to questions 10, 12 and 13, (relating to landscape matters) in the Request for Further Information (RFI).² To respond to those RFI questions, I co-authored a memo, *Resource consent application RMA/2023/3243 - Estuary South New Brighton Park and Southshore - Request for further information*, dated 13 February 2025.
- 2.5 Design changes were made during this RFI process however no updates to the LEA were requested at this time.
- 2.6 This process and the consideration of key changes are set out further in **Section 6** below and do not result in any material changes in landscape, natural character or visual effects.

3. QUALIFICATIONS AND EXPERIENCE

- 3.1 I am a landscape planner and principal at Boffa Miskell Limited (BML). I have held this position for 4 years.
- 3.2 I am a registered member of the New Zealand Institute of Landscape Architects. I hold a Bachelor of Landscape Architecture with Honours (2001)

¹ Attached as Appendix K to both AEEs

² RFI received from Christchurch City Council on 19th February 2024

from Lincoln University as well as a Bachelor of Arts Degree in History and Education (1993) from the University of Otago.

- 3.3 I have practised as a landscape planner for approximately 20 years having held positions in both local government (including CCC) and as a consultant, predominantly in the South Island. My relevant experience covers area-based landscape and natural character assessments such as the Banks Peninsula and Marlborough Landscape Studies, involvement in providing CRC with ongoing landscape and natural character policy advice to assist with the development of their Regional Policy Statement, and project-based landscape assessments within urban, rural and coastal areas, from subdivisions and aquaculture to large scale infrastructure development requiring natural character assessments including hydro and irrigation schemes.

4. CODE OF CONDUCT

- 4.1 Although this matter is not before the Environment Court, I confirm that I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2023) (**Code**) and have complied with it in preparing this evidence. I also agree to follow the Code when presenting evidence to the Panel. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses. I also confirm that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

5. SCOPE OF EVIDENCE

- 5.1 This statement of evidence covers the following:
- (a) A summary of my evidence (see **Section 1** above)
 - (b) **Section 6:** An update to my Landscape Effects Assessment, which was previously provided and is included as Appendix K to the Applicant's Assessment of Environmental Effects (**AEE**);
 - (c) **Section 7:** My comments on the issues raised in submissions that fall within my area of expertise;
 - (d) **Section 8:** My comments on the issues raised in the Section 42A Report that fall within my area of expertise;

(e) **Section 9: Conclusions.**

6. UPDATE TO MY LANDSCAPE EFFECTS ASSESSMENT

6.1 Since the preparation of the LEA, design changes have been developed in response to feedback received from CCC and CRC during the application process.³

6.2 The design changes involved:

- A landward shift of the proposed edge structures, largely avoiding the need for reclamation of the Coastal Marine Area (**CMA**). This includes the removal of the existing 'ad hoc' modifications and beginning the proposed edge protection measures from this point.
- Revised estimates of the width of the trench required to accommodate the toe of the new structures (from 3m to up to 5m wide).
- An amendment to the construction methodology allowing temporary stockpiling of excavated material to limited locations on the estuary.
- A reduction and reconfiguration to three formal access points into the Avon-Heathcote Ihutai Estuary at the ends of Godwit Street, Penguin Street and 90m south of Tern Street.
- A revised edge protection methodology along the South New Brighton Park frontage, by way of a 'soft edge', as described in the Town Planning Group memo to the Hearing Panel dated 5 November 2025⁴ and set out in the evidence of Mr Reinen-Hamill.

Landward shift

6.3 The change in the position of the proposed edge structures will encroach further landward to a small degree but will largely avoid the estuary with more declamation than reclamation overall. The landward part of the Site represents relatively modified open space while reducing seabed disturbance will reduce impacts on natural patterns and processes in the estuary.

³ Refer to updated Engineering Drawings and Landscape Concept Plans appended to the evidence of Mr Little

⁴ Re: Summary of Changes to Application: RMA2023/3243 and CRC242267, CRC242268, CRC242269 and CRC251999

Trench width and construction methodology

- 6.4 The increase in trench width required to construct the proposed edge structures will result in an increase in the amount of estuary bed disturbance,
- 6.5 The amendment to the construction methodology allows stockpiling of excavated material onto the estuary but requires reinstatement during the same low tide window. Stockpiling will be limited to areas located alongside the trench which would be subsequently excavated (i.e., stockpiling onto areas of seabed about to be excavated).

Estuary Access points

- 6.6 The provision for estuary access was identified in the LEA as a key element of the Landscape Masterplan and contributing to identified positive landscape effects.
- 6.7 With a reduction in road end access, public access to the coastal environment and the open space will change. The integration of estuary access will be diminished in some locations and may therefore change how the local community use and enjoy their environment. However, I note that opportunities to informally access the estuary will continue in places such as over the areas of cobble beach and there will be other improvements to public access through the widening of the shared path.
- 6.8 The ONF values associated with the estuary (below the CMA) are strongly tied to biophysical values including habitat and birdlife in particular. The replacement of the Tern Street Jetty with stairs avoids encroachment of structures into the estuary bed which reduces impacts on those important values.
- 6.9 Reducing the number of road end access points and formalising them may also reduce the number of people informally venturing onto the estuary bed, thereby further reducing potential for biophysical-related impacts.
- 6.10 The LEA conclusion was that the high natural character and landscape values associated with the estuary and estuary edge will be protected and maintained with the 5 access points proposed. On balance, my assessment of the overall level of effect associated with reducing formal access is unchanged.

Soft edge

- 6.11 The proposed nature based 'soft edge' is an alternative to the cobble beach design assessed in the LEA and extends from (approximately) CH 235 to CH 405 along South New Brighton Park where considerable erosion has caused the retreat of the estuary edge and the creation of new mud flat behind damaged remaining elements of reno mattress installed along the former estuary edge.
- 6.12 The preliminary concept design assumes the removal of the existing reno mattress and consists of rock armour groynes (the concept sketch indicates four) separated by sandy beach. The groynes are some 18m in length, 7.5m wide and the crest will be some 0.7 m above Mean High Water Springs (as shown in Figures 1, 2 and 3 attached to the Town Planning Group memo)⁵. The maximum seaward extent of the groynes is at the seaward extent of the existing reno mattress with the southern groynes more landward.
- 6.13 The process will require grading back the existing land which would involve further clearance / loss of vegetation extending approximately 15 m inland of the existing coastal edge. Largely, this is an area of an existing (gravel) track, rank exotic grass, planted ngaio trees, and exotic (weedy) shrubs. The upper edge of the 'soft edge' would be planted in appropriate native species.
- 6.14 All sand and gravel are to be retained to form the subgrade of the beach. Additional sand (washed Waimakariri sand) will be imported to top up the beach (estimated at 1600 m³). The landward extent of the beach will be planted and an informal backshore armouring between the beach and planting will utilise the recycled cobbles from the reno mattresses. Gaps in the vegetation are proposed to enable future sand top ups to occur if required.
- 6.15 A monitoring programme is proposed with provision to replace lost sand when required. This would involve trucking in sand and placing it above the MHWS line, allowing natural processes to redistribute the sand down the beach.
- 6.16 The groyne construction will require excavators operating on the foreshore and CMA. A mix of cut and fill will be required in the areas between the groynes to form the required beach subgrade slope.

⁵ Town Planning Group memo to the Hearing Panel dated 5 November 2025

- 6.17 In considering natural character, landscape and visual effects of this soft edge proposal, the nature of effects will be different from those assessed under the cobble beach scenario however, overall I consider the level of effects to not be materially different. Using large rocks and formed at an angle to the shoreline, the groynes will form a visible new pattern along the coastal edge however, they are designed to work with natural coastal processes to enable a soft edge to otherwise remain. The works will occur in the context of an existing damaged and eroding estuary edge and new planting is proposed.
- 6.18 Therefore, overall, neither the landward shift of the proposed edge structures, the reduction in formal access points, nor the proposed 'soft edge' treatment would materially alter the expected outcomes for natural character, landscape or visual matters and these changes do not alter the conclusions in the LEA.

7. ISSUES RAISED IN THE SUBMISSIONS

- 7.1 No CRC submitters in opposition to the proposal raise matters within my area of expertise. On the other hand, various CRC submissions in support of the proposal note the net benefits to vegetation values associated with proposed indigenous planting (for example, the submission of Southshore Residents' Association).
- 7.2 Of the remaining submissions in opposition, six raise concerns including estuary access, the removal of trees, rocks in the estuary and the location of the proposed community garden. I consider these issues to be only indirectly related to the landscape, natural character, or visual effects of the project and have limited my response accordingly, to those aspects of the submissions that are most relevant to my area of expertise.

Estuary Access - handrails

- 7.3 The CCC submission by the Avon Heathcote Estuary Ihutai Trust (#1) in opposition to the proposal raises concerns about the design of the proposed steps: *'The Trust recognises that the proposed four sets of steps along Southshore (at the end of Godwit, Heron, Penguin and Tern streets) are for mana whenua and recreational users to access to the estuary. However, to minimise the impact of the steps on the Open Space Coastal Zone and Outstanding Natural Feature of this area the Trust recommends that these*

steps do not have a handrail.' The submission explains that based on observations of other similar structures, *'the presence of handrails is a very visible and open invitation to access the estuary'*.

- 7.4 The estuary is identified as an ONF and has high biophysical and perceptual values and very high associative values.⁶ These are set out in detail in the LEA. In considering the proposed access and associated handrails, it is my assessment that the handrail is a functional safety feature that is unlikely to be very visible and will not in itself undermine the landscape, natural character or visual amenity values of the Open Space Coastal Zone or the Outstanding Natural Feature.
- 7.5 The heart of the concern may be a broader issue related to the implications of further enabling access to the estuary such as the ecology and birdlife implications which are beyond my expertise. However, I note that the updated design proposes just three formal access points and no longer includes Heron Street and that formalising well-designed access points, with or without handrails, may influence the extent to which people informally venture onto the estuary bed elsewhere.

Estuary Access – number of access points and Tern Street Jetty

- 7.6 The CCC submission by Leane Dempsey opposes the application due to the limits on estuary access from Rockinghorse Road, the removal of existing trees and the introduction of rocks into the estuary (among other matters outside my expertise). They strongly urge the Council to save existing trees and ensure that any replanting complements the existing environment.
- 7.7 The CCC submission by Georgina Langridge also opposes the application due to the removal of estuary access points, specifically the steps and Tern Street Jetty noting, *'A balance should be sought between protecting the ecology and continuing to allow amenity access.'* The submitter requests that the step access and Tern Street jetty be reinstated.
- 7.8 I note that the conflicts between high wildlife values and public access, adjacent shoreline development and heavy recreational use are identified as potential issues for the Estuary in the Regional Coastal Environment Plan (3.6) which also states that the objective of the Regional Policy Statement is

⁶ Boffa Miskell Ltd (2015) Ōtautahi / Christchurch Landscape Study, prepared for Christchurch City Council

to achieve improved access ‘...provided a number of environmental, safety and other concerns are met.’⁷

- 7.9 I have addressed the reduction in access earlier in my evidence (section 6.6-6.10) and find that while estuary access was identified in the LEA as a key element required to manage landscape effects (to achieve the levels of effect assessed), the high natural character and landscape values associated with the estuary and estuary edge will continue to be protected and maintained based on the revised access points now proposed.

Removal of trees

- 7.10 Where vegetation encroaches into the footprint of the proposed works, some clearance will be required. Existing vegetation identified by the community as of note is to be retained and /or moved where possible. I note that additional landscape planting is proposed throughout the Site and CCC has a Tree Policy for managing and maintaining trees in public open spaces to the extent that for every tree removed, a minimum of two new trees will be planted. I also understand that it is proposed to retain/move vegetation identified by the community as of note.

Rocks in the estuary

- 7.11 In regard to comments on ‘the introduction of rocks into the estuary’, under the updated (current) proposal, the cobble beach will not extend into the CMA or include areas of rock which extend beyond the existing more modified estuary edge. The proposed soft edge at SNPB will require the placement of small rock outcrops on the estuary bed in the CMA to break up wave action. The rocks will be within the footprint of the existing reno mattresses with a ‘soft’, beach edge landward and therefore I do not consider that this proposal will have any material effects on landscape, natural character or visual amenity values or change my overall assessment findings.

Community gardens

- 7.12 Three of the submissions in opposition (Pauline Crow, Roderick Schou and Grant Sutherland) refer to concerns about the proposed location of a community garden, citing concerns about privacy, peace, and safety and

⁷ Regional Coastal Environment Plan, Page 34

noting that the garden would impact the quiet enjoyment of their home and garden.

- 7.13 A range of landscape treatments are proposed as part of the Project, within a wider comprehensively planned Landscape Masterplan prepared by CCC which includes provision for community garden space. However, provision for this specific activity was not considered one of the key elements in the Landscape Masterplan required to manage landscape effects in the LEA and, in that regard I consider the location is unlikely to materially change my assessment.
- 7.14 No other CCC submitters in opposition to the proposal raise matters within my expertise. On the other hand, various CCC submissions in support of the proposal note the benefits of the proposed shared path to enjoying the amenity and landscape related values of the open space and estuary such as the submission from Andrew Olliver whose reasons for support included, *'Recognises the ecological sensitivity of the Avon-Heathcote Ihutai Estuary and backs infrastructure that balances protection with natural character. Inclusion of a shared path and pedestrian access points, enhancing recreational and educational opportunities for residents and visitors.'*
- 7.15 However, many submissions in support also raise concerns, particularly about the level of access to the estuary such as Anthony Streeter's submission which requests among other things, jetty access at Tern Street and prioritising access for people to the high tide.
- 7.16 I acknowledge these concerns and have addressed the issue of access earlier in my evidence.
- 7.17 Other concerns raised in submissions included preferences for a more natural edge such as the submission from Bernard Calder, *'I feel the works should be seen as providing a unique opportunity for enhancing and reinstating a more natural edge and transition to the marine environment whilst reviewing compatible recreation options and how we interact with the estuary shore.'*
- 7.18 I note that the updated proposal for groynes along the South New Brighton Park edge provides an opportunity for a softer edge.
- 7.19 Several submissions are associated with concerns about effects on specific locations such as effects of planting on views from their property or proximity

of new paths/bunds or nature/community kai garden to specific homes, such as submissions from Carol Scott, Gaye Meffan, and Bernard Calder.

- 7.20 I have not assessed the effects of individual tree planting, however I did note in the LEA that the Landscape Masterplan generally locates proposed trees closer to boundaries than in the centre of potential views from dwellings, in an attempt to balance visibility of the proposed bund and paths. Overall, the proposed works, including the landscape treatment may result in some variations in outlook in some locations. Views will be in the context of a more highly planted, comprehensively planned, coastal open space.
- 7.21 The CCC submission by Aaron Minson makes a specific recommendation to, *'...split the engineered revetment in two smaller forms (a higher path with engineered bund below, and a lower terrace with marginal planting in between, with a lower revetment providing erosion protection), **This positively reduces negative visual impact** of a single larger engineered revetment.'*
- 7.22 My conclusion in the LEA is that while there will be an increase in intact hard edge, this occurs in a modified context and will result in a relatively low degree of change.
- 7.23 Overall, there have been a number of submissions that are in support of the proposal but raise some specific concerns, none of which I consider to materially change the outcomes for natural character, landscape or visual matters and do not alter the conclusions in the LEA.

8. ISSUES RAISED IN THE SECTION 42A REPORT

- 8.1 I have reviewed the Section 42A Reports prepared by Ms Murray (CRC) and Ms Carter (CCC) with respect to identified landscape effects and the technical peer review provided by landscape architect, Mr Jeremy Head (dated 19 March 2025)⁸. There is a very high level of alignment between Mr Head's peer review, the S42A recommendations and my Assessment (including my RFI response).
- 8.2 In regard to natural character and landscape effects, Mr Head finds my Assessment conclusions are fair and reasonable, noting they are *'balanced with the long-term improvements to natural character given the various*

⁸ Head, J (2025). RMA/2023/3243 Southshore and South New Brighton Inundation Protection Project Landscape Peer Review. Memo prepared for Christchurch City Council, dated 19 March 2025.

aspects of the Project that are discussed such as ongoing erosion attenuation and increased coastal vegetation cover'.⁹

- 8.3 Ms Murray and Ms Carter agree with the advice provided by Mr Head, concluding that on the basis of his expert opinion, they consider that with the proposed mitigation, revetment design, bund design, and planting regime, the potential adverse effects of the proposed erosion protection structures on landscape, natural character, visual and amenity values are acceptable.¹⁰
- 8.4 I note Ms Carter's comment that '*Further details of the soft edge option were not available at the time of writing this report, consequently I am unable to provide comment from Mr Head on the landscape effects of this potential alternative to the cobble beach currently proposed.*'¹¹ I have considered the 'soft edge' option earlier in my evidence and as set out in paragraphs 6.11-6.18, and find that overall, it does not change my conclusions in regard to levels of natural character, landscape and visual effect.
- 8.5 I also note Ms Carter's comments relating to Mr Head's review of the submission by Scott Butcher [#122] which seeks more naturalised options for coastal hazard protection in this area. I consider Mr Butcher's submission to be focussed on ecological matters that are outside my area of expertise. However, I support Mr Head's view as summarised by Ms Murray, on the importance '*that the range of other matters that have influenced the current choice of protection structures comes into play when considering protection of urban development and public infrastructure.*'¹² I also note that the 'soft edge' proposed at South New Brighton Park (SNBP) is a more naturalised option that will provide some flexibility to allow for further natural processes such as erosion and land inundation in the future.

Ms Murray notes that Mr Head agrees that the proposal will make access to estuary flats more limited than it currently is but overall, '*is satisfied that the proposed reduction in formal/controlled estuary access points with future conditions at detailed design stage to protect seagrass will have a positive effect on natural character and landscape quality compared to the existing situation.*'¹³ I address estuary access earlier in my evidence (paragraphs 6.6-

⁹ Ibid, p5

¹⁰ S42A Report (CRC), paragraphs 218-229 and S42A Report (CCC), paragraphs 81-94

¹¹ S42 A Report (CCC), paragraph 91

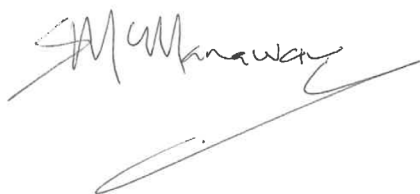
¹² Ibid, paragraph 92

¹³ S42A Report (CRC), paragraph 228

6.10) and am broadly aligned with Mr Head's view in so far as I consider that the high natural character and landscape values associated with the estuary and estuary edge will continue to be protected and maintained based on the revised access points.

9. CONCLUSIONS

- 9.1 My evidence has addressed the natural character, landscape and visual effects of the proposed construction and operation of erosion and inundation protection works along the Southshore estuary edge.
- 9.2 In particular, I confirm neither the landward shift of the proposed edge structures, the reduction in formal access points, nor the proposed 'soft edge' treatment would materially alter the expected outcomes for natural character, landscape or visual matters and these changes do not alter the key conclusions in the LEA.
- 9.3 I have considered and responded to submitter feedback within my area of expertise and there are no important areas of disagreement arising from the CRC and CCC s42A officers' reports.
- 9.4 The Project will result in some temporary adverse natural character, landscape and visual effects as part of the construction process. However, such effects will be localised and once completed, these effects will be largely benign. The extent of restoration planting proposed as part of the Landscape Masterplan will result in additional beneficial effects over time, further integrating the proposed works and reinforcing the coastal character of the Estuary edge at Southshore.



Susan Jane McManaway

Dated 21 November 2025