

Memorandum

To	Janice Carter, Consultant Planner, Christchurch City Council Resource Consent Team	From	Jess Bould, Senior Planner, Environment and Planning
Copy	David Little, Manager Residential Red Zone	Reference	P520867
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Subject	Stockpiling Assessment – Southshore and South New Brighton Flood Inundation Protection Project		

1 Introduction and purpose

Stockpiling of material is an ancillary activity, supporting the Southshore and South New Brighton Flood Inundation Protection project by providing a location for construction materials to be stored near to the work area. This reduces traffic movements and allows for materials to be delivered and stored away from the direct project area.

Stockpiling of material is proposed to occur at a Christchurch City Council site, located at 80 Owles Terrace (the Site). This Site has been regularly used in the past for stockpiling of materials. The Site is also used as a base for water based recreational activities. For clarity, only a portion of the Site is proposed to be utilised for stockpiling.



Figure 1 | 80 Owles Terrace, New Brighton legally described as Lot 1 DP 47330 Source: Grip Maps 2025

The Site is part of the Specific Purpose (Ōtākaro Avon River Corridor) Zone under the Christchurch District Plan (CDP). The Site is also subject to natural hazard overlays (high flood hazard management area, flood management area and liquefaction management area). The Site is partially within the natural character in the coastal environment overlay and partially included within the Coastal Environment overlay. The Ōtākaro Avon River is adjacent to the site and is classed as a Site of Ecological Significance. The portion of the land parcel to be utilised is located outside of the overlay areas identified, except the natural hazard overlays which apply to the whole Site.



Figure 2 | Approximate site area to be used shown in orange dash. Source: Christchurch District Plan

2 Stockpiling

Large volumes of material and rock will need to be introduced to the project area. Given the sensitive nature of the project area (ecological and landscape values) and surrounding activities (residential and recreational uses), it is not suitable to store gravel and rock near the work areas. Owles Terrace has been identified as a suitable and secure location in which to store this material for use over the course of the project.

Owles Terrace can be easily serviced with larger vehicles depositing material. Smaller vehicles would be utilised to transport material to the work area from Owles Terrace compound.

Owles Terrace may also be used to stockpile material excavated from the project area, noting that any contaminated material would be taken directly to an appropriate disposal site and not stockpiled.

Approximate total material volumes are as follows:

- Revetment rock and toe material – 11,870 m³
- Cobble beach – 1,830 m³
- Bund material (AP65) – 11,110 m³
- Gravel / AP for general civil works – 1,500 m³

Material will be progressively deposited and used at the Site reiterating the material volumes set out above will not be all present at once. There will be periods of time when works are unable to occur (for example, seasons or being unable to carry out works during bird nesting season).

The applicant is comfortable conditions of resource consent will likely be imposed relating to the overall volume of material being located at the site.

Stockpiled material will be managed in accordance with good practice Erosion and Sediment Controls (namely, Environment Canterbury's Erosion and Sediment Control Toolbox), including dampening or covering materials to reduce dust and site controls to reduce stormwater run-off. Stormwater will be discharged via land.

3 Assessment of activity against the Christchurch District Plan

This section provides an assessment of the proposal against the relevant CPD rules.

3.1 Relevant definitions

Stockpiling is captured within the definition of earthworks under the CDP

Means the filling, excavation, disturbance of, deposition on or change in profile of, the land of a site by:

- a. Moving, removing, placing or replacing earth, rock or soil; or*
- b. Root raking and blading; or*
- c. Inserting cement, bentonite grout, timber or other foundation piles and/or undertaking other methods, either for earthquake repair or to strengthen the land to allow for construction of building on the site; or*
- d. Constructing a track, firebreak or landing; or*
- e. Installing services or infrastructure.*

On this basis, stockpiling is captured as an earthworks activity under the CDP.

3.2 Relevant Planning Rules

The relevant rules of the CDP are addressed in Table 1 below.

Table 1 | Christchurch District Plan Assessment

Rule	Assessment
Rule 8.9.2.1 P1 – Earthworks: a. Not for the purpose of the repair of land used for residential purposes and damaged by earthquakes; and b. N/A – relates to Industrial General Zone (North Belfast).	Stockpiling required to support the project is unable to meet the standards set out under Rule 8.9.2.1 P1 of the CDP.
Relevant Standards	

a. Ōtakaro Avon River Precinct has a specified volume of 50 m ³ / ha in any 12 months, in Table 9.	The volume will be unable to be met. Material volumes will be confirmed through detailed design, noting the desire to reuse material where appropriate and the need to bring material in.
b. Earthworks in zones listed in Table 9 shall not exceed a maximum depth of 0.6m, other than in relation to farming activities, quarrying activities, or permitted education activities.	While no below ground earthworks are required, the height of the stockpile would exceed 0.6 m. This standard specifically relates to depth rather than height but has been included for completeness and to provide the understanding in relation to height.
Rule 8.9.2.3 RD1 Any activity listed in Rule 8.9.2.1 P1 or Rule 8.9.2.2 C1 that does not meet any one or more of the activity standards.	Stockpiling is a restricted discretionary activity. Matters of discretion are set out in Rule 8.9.4

4 Assessment of Actual and Potential Effects

Stockpiling is assessed as a restricted discretionary activity, with CCC restricting the matters that can be considered. Table 2 provides the assessment against specific matters of discretion.

Table 2 | Assessment of Actual and Potential Effects

Matter	Assessment
8.9.4.1 Nuisance	Relevant. Dust from stored materials may generate a nuisance effect during dry and windy conditions where dust may travel beyond the boundary of the Site. Stockpiles will be managed in accordance with good practice Erosion and Sediment Control (ESC) methods, including dampening or covering material where appropriate. Stockpiling will be incorporated within the overarching Environmental Management Plan (EMP) that CCC develop for all projects. Nuisance effects may also arise from vehicle movements. Vehicle movements bringing material to the Site will be irregular and infrequent throughout the overall duration of the project. Further detail on frequency will be determined through the detailed design phase and included within the EMP for the project. Large vehicles delivering material will be infrequent with smaller vehicles operating during working hours to carry material daily to the project areas. The frequency of movements is likely to vary, according to the type of works that are occurring. For this reason, there needs to be some flexibility in vehicle movements occurring. Vehicle movements including site deliveries and movement of material will be managed within the EMP, setting out appropriate timing for deliveries and vehicle movements to occur. Dust and vehicle movements are the activities likely to have a nuisance effect on neighbouring residents and recreational users. Dust and traffic effects will be mitigated, using the protocols set out above. On this basis, the actual and potential nuisance effects are assessed as less than minor.

8.9.4.2 Resources and assets	Not relevant as the Site does not have versatile soils or relate to the National Grid.
8.9.4.3 Land stability	Not relevant. The matters of discretion largely relate to excavation and changes to ground level arising from the intention to construct a building on Site. Stockpiles will be limited to an appropriate height and volume for health and safety reasons.
8.9.4.4 Coastal hazard	Not relevant. The matters of discretion do not relate to stockpiling of material.
8.9.4.5 Quarries	Not relevant as the Site is not a quarry.
8.9.4.6 Amenity	Relevant. The stockpile may be visible from a distance. The Site is regularly used for the purpose of storing material for a range of projects and so this use is not considered to be out of context with what surrounding users would expect. The Site is well set back and does not directly adjoin residential areas so there are no concerns relating to views, outlook, overlooking or privacy. A portion of the Site is used by recreational water users (kayaks and boating activities). Stockpiles will be cyclical, that is, evident when a delivery of material has just been made before decreasing over time. The actual and potential effects on amenity values are assessed as less than minor.
8.9.4.7 Indigenous biodiversity, natural character and landscape features	Not relevant as the activity will occur outside of the relevant overlays.
8.9.4.8 Historic Heritage	Not relevant as ground disturbance is not proposed nor is the Site a known archaeological site.
8.9.4.9 Sites of Ngai Tahu Cultural Significance	Not relevant as the Site is not within a Site of Ngai Tahu Cultural Significance.
8.9.4.10 Coastal Environment	Relevant. The Site is located within the defined coastal environment. The stockpiles will not adversely effect indigenous biodiversity or ecosystems, natural character, natural landscape features, visual quality or amenity values, historic heritage, or a Site of Cultural Significance to Ngāi Tahu. The proposal will not impact on access to coastal areas and in fact, supports a project which is seeking to improve coastal areas. Stockpiling will not result in adverse cumulative effects, nor be susceptible to coastal hazards. Overall, stockpiling is assessed as having a negligible effect when taking into account the matters of discretion set out under Rule 9.6.3.

The actual and potential effects arising from using the Site for stockpiling activities have been assessed as less than minor. The Site is regularly used for similar activities, with potential nuisance effects relating to dust and vehicle movements the most likely effects to arise. Protocols to manage dust will be in place and will include dampening or covering material and limiting the height and size of

the stockpile heights. Vehicle movements will be managed within the EMP so as to minimise impacts on surrounding residents and other road users.

5 Objectives and Policy Assessment

The relevant objectives and policies of the CDP are set out and assessed in Table 3, below.

Table 3 | Objectives and Policies of the CDP

Objective / Policy	Assessment
Objective 8.2.4 Earthworks a. Earthworks facilitate subdivision, use and development, the provision of utilities, hazard mitigation and recovery of the district.	Earthworks (stockpiling) is required to facilitate the flood protection inundation project. Stockpiling allows for material to be delivered and stored near the project area. The proposal is consistent with Objective 8.2.4.
Policy 8.2.4.1 Water quality a. Ensure earthworks do not result in erosion, inundation or siltation, and do not have an adverse effect on surface water or groundwater quality.	Stockpiles will be managed to mitigate effects beyond the boundary including dust erosion and runoff. Methods may include dampening or covering material. The proposal is consistent with Policy 8.2.4.1.
Policy 8.2.4.3 Benefits of earthworks a. Recognise that earthworks are necessary for subdivision, use and development, the provision of utilities, hazard mitigation and the recovery of the district.	Stockpiling is considered a necessary ancillary activity to support the wider project. The proposal is consistent with Policy 8.2.4.3.

The proposal to stockpile material is consistent with the objectives and policies of the CDP.

6 Conclusion

Resource consent is required to authorise the stockpiling of material (earthworks) at 80 Owles Terrace as a **restricted discretionary** activity.

Stockpiling is necessary to support the wider project, with the Site being able to provide material storage areas while the project is under construction. The actual and potential effects arising from the use of the Site for stockpiling are assessed against the relevant matters of discretion as less than minor.