

**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 DAVID JOHN LITTLE
ON BEHALF OF CHRISTCHURCH CITY COUNCIL
(APPLICANT)
Dated: 20.11.2025**

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1. SUMMARY OF EVIDENCE

- 1.1 My evidence outlines the strategic necessity for the Southshore and South New Brighton Park Estuary Edge Project. This Project is mandated by a Council Resolution to address the legacy effects of the Canterbury Earthquake Sequence. Its primary purpose is to restore the level of flood and erosion protection to pre-earthquake standards, safeguarding both public assets and private residential properties. This is a transitional project, with the requested 20-year consent duration designed to provide immediate security while affording the Council and community the necessary time to develop long-term climate adaptation strategies through the Coastal Hazards Adaptation Planning (CHAP) programme.
- 1.2 Since lodgement, the Project has undergone significant refinement in response to engagement with regulatory technical specialists. Key changes include a shift from encapsulating old structures to complete removal, resulting in a significant net declamation across the project, as well as adoption of a 'soft edge' design at South New Brighton Park. We have also reduced the number of access points to the estuary, removed the proposed Community Kai Garden to address neighbour concerns and committed to an on-site remediation plan to ensure no net loss of saltmeadow habitat.
- 1.3 A challenge faced by this project has been balancing community interests and public amenity with the statutory requirement to protect sensitive ecological habitats. I consider the Project represents the most responsible and practicable method to manage current coastal hazards while enhancing the environmental and cultural values of the Estuary edge.

2. INTRODUCTION

- 2.1 My full name is David John Little.
- 2.2 My evidence is given on behalf of the Applicant, in my capacity as Project Sponsor for the Southshore and South New Brighton Park Estuary Edge Project (the Project).
- 2.3 My evidence relates to the necessity for and governance of the Project, including the decision-making history, stakeholder engagement and the project's capacity to deliver on its flood protection mandate. Specifically, my evidence addresses the rationale for post-lodgement design amendments and commitments implemented to ensure the Project balances its core

objectives with environmental, cultural and long-term climate adaptation obligations.

3. QUALIFICATIONS AND EXPERIENCE

- 3.1 I am currently the Residential Red Zone Manager at Christchurch City Council, a position I have held since March 2022. Prior to this, I served as Senior Planner within the same team for around 15 months.
- 3.2 I am a qualified landscape architect by profession, holding a Bachelor of Landscape Architecture with Honours (1998) from Lincoln University.
- 3.3 Before my tenure at Christchurch City Council, I spent a decade at Auckland Council managing a team of seven landscape architects. My focus there was the in-house delivery of Parks projects, alongside managing more complex, cross-disciplinary projects with the Healthy Waters and Transport departments.
- 3.4 I have professional experience spanning over 25 years, across a range of private consultancies and local government roles. The experience most relevant to the present application falls broadly into two areas: Strategic Delivery and Management of Red Zone Assets, and large-scale Infrastructure and Open Space Integration.
- 3.5 In my current role, I hold responsibility for the oversight, delivery and maintenance of all Residential Red Zone assets within Christchurch City. This portfolio includes managing the life risk found in the Port Hills Red Zone and directing the ecological restoration of the 80-hectare Brooklands Red Zone, in addition to the Southshore Red Zone which is the focus of this application. Most significantly, I am responsible for the major ecological restoration and recreational work within the Ōtākaro Avon River Corridor (OARC), where the parks component alone is valued at approximately \$170 million. This project involves navigating complexity relevant to the current hearing, including land contamination, high groundwater tables, and adapting to climate change considerations within a highly sensitive and visible environment.
- 3.6 My prior experience, particularly during my decade at Auckland Council and immediately prior to that in private consultancy, focused on the integration of major infrastructure and public open space. This included my involvement with Auckland's Waterview Connection Project. This project presented

significant open space challenges and required extensive mitigation due to its scale. I provided technical expertise as the lead landscape architect and open space planner during the Board of Inquiry (BOI) process, focusing specifically on the mitigation strategy. This work included open space revitalisation, creek rehabilitation and ecological restoration works, and numerous public amenities (including two skate parks, a large playground, sports facilities and a BMX track). Later, in my council role, I focused on the quality assurance and delivery of these open space and environmental mitigation components.

- 3.7 Following this, I managed the landscape component of the Awakeri Wetlands project in Takanini. This project involved creation of a new 2.3km stormwater channel and wetland system to improve local flood resilience and enable housing development. This experience demonstrates capability in planning and delivering large-scale infrastructure that successfully balances water management and ecological restoration outcomes alongside new public recreational facilities.

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:** The genesis of the project, including the Council resolution directing it;
 - (c) **Section 7:** Consultation and engagement, from the start of the project up to this point;

- (d) **Section 8:** The rationale for the key amendments and commitments made Post-AEE Lodgement;
- (e) **Section 9:** My comments on the issues raised in submissions that fall within my area of expertise;
- (f) **Section 10:** My comments on the issues raised in the Section 42A Report that fall within my area of expertise; and
- (g) **Section 11:** Conclusions.

6. PROJECT GENESIS

- 6.1 The Project originated as a response to land damage and subsidence caused by the Canterbury Earthquake Sequence (CES) of 2010–2011. The failure of existing private and public protection structures coupled with land subsidence left the community facing risks from erosion and inundation. This led to sustained advocacy from groups like the Southshore Residents Association (SSRA) for repair, with more detail on this aspect covered in the evidence of Mr Tom Parsons.
- 6.2 In response to this community advocacy, the Council instructed staff in May 2019 to report on options to address estuary edge legacy issues. This work was to separate urgent repair work from the long-term requirement of climate change adaptation.
- 6.3 Following extensive engagement, including a Community Options Assessment, the Council formalised the Project mandate via Resolution CNCL/2020/00138 on 12 November 2020. This resolution approved, subject to funding and consenting, the construction of:
 - a) ***Southshore Erosion:*** The unit approach to replacement or encapsulation based on the physical characteristics of the edge.
 - b) ***Southshore Inundation:*** A new engineered bund to 11.4m RL¹ near to the current 'LINZ bund' alignment.
 - c) ***South New Brighton Erosion:*** A cobble beach with existing reno mattress as core.

¹ The final design of the Project implements a refined inundation bund elevation of 11.5m RL. This 100mm increase was added during the design phase as contingency for ongoing vertical land movement (VLM) and survey/construction tolerances. This ensures the 50-year design level of protection is consistently met when tied into adjacent flood protection works (such as the Bridge Street bund).

- d) ***South New Brighton Inundation: A new engineered bund to 11.4m RL set 25-100m back from the estuary edge.***

- 6.4 The SSRA supported these recommendations via a deputation to Council on behalf of the community, underscoring that the proposed solutions were regarded locally as the appropriate, desired strategy to repair earthquake legacy issues and provide a platform for subsequent climate adaptation discussions.
- 6.5 All subsequent design, engagement, and consenting efforts have been aligned with this mandated purpose: restoring pre-CES protection and preventing further land loss.

7. CONSULTATION AND ENGAGEMENT

- 7.1 My evidence in this section summarises the engagement process undertaken for the project. This process demonstrates how stakeholder feedback and regulatory requirements have shaped the final design presented for this Hearing.
- 7.2 The background to the engagement undertaken between 2019 and late 2023 is detailed in Section 7 of the Applicant's Assessment of Environmental Effects (AEE). I have added extra context following this date.
- 7.3 The engagement focused primarily on reconciling the Project's core objectives (inundation/erosion protection) with environmental constraints, cultural values, and community desire for enhanced amenity and access along the coastline.
- 7.4 The advancement of this Project relied on collaboration with our Treaty Partner, the affected community and regulatory agencies. This process ensured that the final design was technically sound, while being socially and culturally appropriate.
- 7.5 Engagement with the Te Ihutai Ahu Whenua Trust (the Trust) was undertaken early and consistently, following the process detailed in AEE Section 7.2.1. This was a partnership approach, where the Trust provided cultural design guidance and an interpretation narrative for the Landscape Masterplan.
- 7.6 This collaboration ensured that cultural values and heritage were protected and enhanced. A key outcome was the inclusion of gabion baskets at South

New Brighton Park (SNBP) to encapsulate and protect exposed archaeological midden sites from further erosion.

- 7.7 Council has received written approval for the Project from the Trust, demonstrating satisfaction that the final design appropriately recognises and provides for cultural values.
- 7.8 Ongoing dialogue with the SSRA and the wider community informed many aspects of the Project, as summarised in the AEE. In addition to regular catch-ups with the SSRA, Council ran a two-week formal public consultation process on the draft landscape plans, active from 13 June to 27 June 2023, which included a drop-in day at The Bridge on Saturday 17 June. Furthermore, a 'drop a pin' online exercise was conducted between 8 and 18 September 2023 to allow the community to pinpoint trees and landmarks of local significance. The feedback resulted in a suite of improvements to the plans, including:
 - (a) Confirmation of the 3m width and alignment of the shared pathway on the inundation bund.
 - b) Adjustments to the planting scheme to preserve visual corridors and amenity values.
 - c) The strategy to remove asphalt and shorten road ends to discourage anti-social behaviour while maintaining vehicle turning and parking access.
 - d) Inclusion of 'bioretention basin' areas at damp/flood risk areas identified by the community
 - e) Adjustment of the nature play space location following concerns regarding proximity to existing assets and adjacent houses.
- 7.9 The Pleasant Point Yacht Club was engaged early, resulting in the inundation bund at SNBP being moved further inland to preserve the space required for their trailer parking and event operations.
- 7.10 Targeted engagement was carried out to manage potential adverse effects on affected private properties. This included:
 - a) Successful negotiation of land purchase or formal agreements for structures on long residential titles on Rocking Horse Road (e.g. 168A, 172D, 184B).

- b) The design proposed at 44A Rocking Horse Road (lowered public pathway) was the result of negotiation with the owners to mitigate privacy concerns while reinstating continuous public access along the coast.
- 7.11 The technical feedback received from the Consent Authorities (ECan and CCC Planning/Technical Specialists), particularly through the Section 92 process and ECan Notification Recommendation Report, prompted a final round of design refinement (as detailed in the Planning Memorandum of 5 November 2025).
- 7.12 This refinement demonstrates the Applicant's commitment to avoiding, remedying, and mitigating effects beyond the initial AEE scope. These changes are detailed in my paragraph 8.2.

8. UPDATE ON POST-LODGE MENT AMENDMENTS AND RATIONALE

- 8.1 As Project Sponsor, I did not contribute to the technical component of the Assessment of Environmental Effects (AEE). However, on behalf of Council, I confirm that the following objectives and requirements, as established in the Council resolutions and original AEE, remain unchanged:
- a) The Project's core objective is the remediation of the effects of the CES by restoring pre-quake levels of inundation and erosion protection to public and private infrastructure at Southshore and South New Brighton Park.
 - b) The proposed design levels for both the inundation bund (RL 11.5m² CDD) and the erosion protection crest (RL 11.3m CDD) required to meet the 50-year return period water level event protection standard.
 - c) The necessity for the erosion protection structures to be located at or near the Estuary edge to reduce the risk of geotechnical failure (including lateral spread) in future seismic events, protecting the landward inundation bund and properties behind it. Maintaining erosion protection at or near the existing line confines the failure plane of erosion/seismic instability to the publicly owned land and avoids increasing the long-term seismic risk profile for the adjacent private residences.

² Increased from the original project scope of 11.4m, as addressed in Paragraph 6.3

8.2 I draw to your attention the following changes between the updated application and the original application filed last year:

- (a) **Consent Duration:** The requested consent duration has been reduced from 35 years to 20 years to align with the design life of the structures and reflect the transitional nature of this project ahead of Council's Coastal Hazards Adaptation Programme (CHAP).
- (b) **Structure Positioning and Reclamation:** The proposal has been significantly amended to include complete removal of existing failed structures and debris, rather than encapsulation. This has resulted in a landward shift of the erosion protection structures where possible, resulting in a reduced need for reclamation of the Coastal Marine Area (CMA) and a net declamation of 2473m² (refer to the Reclamation and Declamation Plans in **Appendix 1**).
- (c) **Saltmeadow habitat:** The approach for managing the residual effects on Saltmeadow habitat has shifted from a proposed off-site offset at Southshore Spit Reserve to an on-site remediation plan, designed to achieve "no net loss/net gain" within the project footprint. The designated area is shown in the Landscape Concept Plans in **Appendix 2**.
- (d) **Estuary Access Points:** In response to ecological concerns regarding impacts on sensitive habitats (seagrass/avifauna), the number of access points to the Estuary has been reduced from the original design to three locations (Tern Street, Godwit Street, and Penguin Street). The proposed Tern Street jetty has been removed, and the access point location shifted to the south slightly due to increases in seagrass here.
- (e) **Soft Edge Concept (SNBP):** A new 'soft edge' concept has been adopted for the South New Brighton Park frontage (between CH235 and CH405). This approach, supported by coastal processes specialists, uses natural elements to enhance environmental outcomes and avoid the need for a hard structure (details of which are provided in the Engineering Plans in **Appendix 3**). The original cobble beach is retained as a contingency option in the event of failure.

- (f) **Decommissioning Commitment:** A condition requiring the structures to be either removed or re-consented at the expiry of the 20-year term, including the preparation of a Decommissioning Plan, has been incorporated to address CRC concerns regarding the status of the structures outside the assessed timeframe.

9. ISSUES RAISED IN THE SUBMISSIONS

- 9.1 A total of 479 submissions were received during the notification processes of both Christchurch City Council (CCC, 179 submissions) and Canterbury Regional Council (CRC, 300 submissions). Of these, the majority were either in support or neutral, with only 12 submissions in opposition.
- 9.2 Three submissions in opposition were initially received by CRC. One was subsequently clarified to be in support, having made an error on the form. A second, received from the Department of Conservation (DoC), which opposed the application in part, has been subsequently addressed through the refinement of proposed conditions, as detailed in the evidence of Ms. Jess Bould, the Council's Consulting Planner.
- 9.3 The remaining submission in opposition to the CRC consent was supplied by the Avon-Heathcote Estuary Ihutai Trust. The Trust's concerns focus on protection of the estuary's ecological function, specifically habitat loss and coastal squeeze, design material, and increased human disturbance viewed through a lens of cumulative effects. The project team considered these matters and I discuss these below.
- 9.4 The Trust raised concerns regarding the potential for intertidal habitat loss due to coastal squeeze over the project's lifespan. The Council has responded to this via two changes planned to the project. First, the requested consent duration for the structures has been reduced to 20 years to align with the design life. This duration ensures the project meets the mandate of restoring earthquake legacy protection, while providing necessary time for Council's Coastal Hazards Adaptation Planning (CHAP) Programme to develop community-led adaptation plans to inform future decisions on the structures' form and necessity. Secondly, the design now involves the removal of existing, failed structures rather than encapsulation. This commitment resulted in a landward shift of the proposed erosion protection and a calculated net declamation of 2473m² of the Coastal Marine Area (CMA), thereby creating new soft sediment habitat rather than consuming it.

- 9.5 Additionally, we have committed to a 'soft edge' design for part of the South New Brighton Park edge. This approach demonstrates Council moving away from hard engineering where feasible, allowing for reduced coastal squeeze impacts. This design is supported by monitoring embedded in the proposed consent conditions. This data will be used to inform future decisions on the design and function of Estuary edge protection across the wider area, particularly for long-term coastal hazard planning. The original cobble beach remains a contingency, should this approach fail to prevent erosion.
- 9.6 The Trust opposed the use of cobble beaches, concerned that they are an artificial habitat whose migrating stone material could damage the soft sediment mudflats and reduce their ecological health. Our use of cobble beach material provides an engineered solution that achieves the Project's erosion protection mandate while presenting a softer, more natural visual character than either revetment or the existing retaining structures. Council is committed to managing any residual effects through the proposed consent conditions. Proposed CRC Conditions 10 and 11 mandate annual monitoring and mapping of the cobble toe, prompt inspection after storm events, and removal of any material washed onto the mudflat habitat.
- 9.7 A challenge highlighted by this submission is balancing community desires for recreational and mahinga kai access with the risk of increased trampling and bird disturbance. To manage this conflict, the number of formal access points has been reduced to three. This concentrates human activity to locations selected by our ecologists as having the least potential impact, while minimising the overall extent of trampling risk across the shoreline. To address enforcement, Council has agreed to the Trust's request for clearer signage. Proposed Condition 31 requires signs at all access points that state that dogs/vehicles are prohibited and provide information on the ecology of the area. This will reduce disturbance effects and allow for more rigorous enforcement.
- 9.8 Finally, the project addresses the wider context of cumulative effects. By achieving a net gain in soft sediment area and ensuring no net loss of saltmeadow habitat through a dedicated remediation plan, and by removing decades of derelict, eroding and potentially contaminated debris from the shoreline, the project contributes positively to the Estuary's health. The construction phase effects, which are temporary and local, will be controlled via the certified CEMP.

- 9.9 The adverse effects identified by the Trust have been avoided, minimised, remedied or offset by changes to the project, ensuring it achieves its objectives while maintaining the environmental values of the Estuary.
- 9.10 Turning to the CCC consent, nine submissions in opposition were initially received, and these fall into three broad categories; the mahinga kai garden, the reduction in planned access points and general ecological concerns. I will address each topic below.
- 9.11 Three of the submitters (Roderick Schou, Pauline Crowe and Grant Sutherland) opposed the planned siting of the Community Kai Garden adjacent to their properties in the Landscape Masterplan. The opposition cited loss of privacy, amenity conflict and the impracticality of the exposed location for horticulture.
- 9.12 Following a review of these submissions, the Council has elected to remove the Community Kai Garden component from the proposal for which consent is sought.
- 9.13 The Masterplan attached to the application will be updated prior to the commencement of works to reflect this deletion, and the area previously allocated will be allocated as amenity grassland. This action resolves the adverse effects raised by these submissions and ensures the design maintains the coastal character of the area.
- 9.14 A further three submitters (Georgina Langridge, Noelene Nunnink, and Leane Dempsey), oppose the reduction in formal estuary access points that was proposed to address concerns raised in the ECan submission process. These submitters advocate for the reinstatement of access points or a change from steps to ramps to promote community use and accessibility.
- 9.15 The Council recognises that maintaining and enhancing public access and recreation is an objective of the RMA (Section 6(d)). However, access must be balanced against the statutory requirement to protect sensitive ecological habitats (NZCPS Policy 11) and the integrity of the coastal environment.
- 9.16 The decision to reduce access to three points and remove the planned jetty was a response to technical concerns raised by the Ihutai Trust and CRC regarding the potential for disturbance effects on seagrass habitats and avifauna. Dr Alestra's evidence supports the need to locate access points

away from sensitive habitats. The revised access strategy thereby directs activity away from seagrass beds to minimise trampling and disturbance.

- 9.17 The remaining access locations at Godwit, Penguin and Tern Streets were selected by our technical team to ensure relatively even spacing along the spit, while also being situated a minimum 20 metre distance from mapped seagrass habitats. This ensures that public access is provided for in locations which minimise the potential for impacts on the estuary's most sensitive ecological areas. The preference for steps over ramps was determined by the need to minimise the physical footprint of the structure within the CMA, reducing impacts on sensitive habitats.
- 9.18 Ecological concerns were raised by the last group of submitters; The Avon-Heathcote Estuary Ihutai Trust, Jan Walker, Leane Dempsey and Scott Butcher.
- 9.19 The Trust's submission had a reduced list of concerns from that supplied on the CRC Consent, perhaps reflective of some of the changes made to the application in the interim. Its submission opposes the planned handrails on the access steps, and objects to any loss of estuarine habitat (480 m² reclamation noted), asking for the project to be moved further landward.
- 9.20 The objection to handrails on the access steps is to discourage casual access to the estuary. Provision of handrails for formal public access points is a non-negotiable safety requirement for the Council, to ensure the safety of all users. The final design will incorporate handrails that are as unobtrusive as possible, while meeting mandatory safety standards.
- 9.21 On the habitat loss point, following design refinements and removal of the planned encapsulation, the project achieves a calculated net declamation of 2473m² of the CMA. Where permanent reclamation remains necessary, it is confined to functionally constrained locations (the section adjacent to 44A Rocking Horse Road and gabion baskets required to protect the midden sites at South New Brighton Park, and creation of the 'soft beach' recommended by CRC).
- 9.22 Jan Walker opposes the construction of hard structures, arguing this will prevent saltmarsh communities from migrating inland as sea levels rise (coastal squeeze). This matter has been addressed in my response to the Avon-Heathcote Estuary Ihutai Trust's CRC submission (paragraphs 9.4 and 9.5).

- 9.23 Leane Dempsey raises a range of objections relating to amenity, wildlife stress, tree removal and the appropriateness of hard structures (rocks).
- 9.24 Tree removal has been minimised via the design, however the nature of the works makes it difficult to work around individual trees, meaning that the quantum of tree removal is significant. Many of these, however, are small self-seeded specimens. Their removal is offset through the Landscape Masterplan, which includes ecosourced replanting that exceeds the CCC Tree Policy requirements, as detailed in the Arboricultural Assessment.
- 9.25 Temporary disturbance to wildlife during construction will be managed under certified plans, including the Lizard Management Plan and the protocols for avoiding the bird breeding season (Dr Leigh Bull's evidence). The use of rock is necessary for erosion protection and is required to allow removal of the ad-hoc hard structures currently fronting the shoreline, as outlined in Dr Reinen-Hamill's evidence (Coastal Engineering).
- 9.26 Scott Butcher provides an ecological opposition, arguing that the design constitutes a hard edge that ignores climate change impacts, eliminates saltmarsh retreat, and will cause detrimental impacts on shorebirds during construction. His submission makes recommendations for changes to a number of specific parts of the project. I believe that the changes implemented since lodgement address the ecological risks raised by Mr. Butcher, as far as practicable.
- 9.27 Mr. Butcher's overarching concern regarding the establishment of a hard edge preventing saltmarsh retreat is addressed in my response to the Avon-Heathcote Estuary Ihutai Trust's CRC submission (paragraphs 9.4 and 9.5).
- 9.28 More specifically, Mr. Butcher opposes the potential disturbance and loss of seagrass habitat from the revetment proposed at 44A Rocking Horse Road. The revetment toe here ends some five metres from the nearest mapped seagrass habitat, and a minor extension of the revetment is required to reinstate continuous public access along the foreshore, consistent with NZCPS Policies 18 and 19. Currently, walking access here is detoured onto Rocking Horse Road, compromising user safety and amenity. All works in proximity to seagrass are governed by the proposed Seagrass and Saltmarsh Management Plan (SSMP), which mandates avoidance protocols. Mr Butcher's suggestion of property acquisition and removal is not feasible

as the residents do not want to sell and Council cannot compel acquisition for this purpose.

- 9.29 Mr. Butcher recommends alternative shoreline alignments at SNBP (observing some natural edge stabilisation) and at Ebbtide Street (to facilitate saltmarsh retreat and offset project impacts).
- 9.30 At SNBP, while a short section (around chainage 240-280) has stabilised, the community advise that the remaining area continues to erode rapidly, and Council had to re-route the walking track inland earlier in the year following storm damage. Our Coastal Engineer advises that most of the edge will continue to erode as the beach orientation does not allow stabilisation to occur naturally. The soft edge design therefore includes informal groynes to create a suitable angle across the full extent, matching what has stabilised naturally.
- 9.31 At Ebbtide Street, reversing the edge alignment to the extent suggested is not feasible. Such a setback would bring the erosional hazard too close to retained residential properties, potentially increasing risks such as lateral spreading and fundamentally contradicting the project's core objective of restoring earthquake protection levels to existing infrastructure. The soft edge approach at SNBP represents the maximum practical flexibility achievable in this constrained environment.
- 9.32 The concern regarding disturbance to shorebirds during construction and from ongoing recreational use is managed through the consolidation of access to three points (paragraph 9.7), strict controls during the bird breeding season (Dr Leigh Bull's evidence), and the placement of clear signage (CRC Condition 31).
- 9.33 While this section has focused on the opposing submissions, the majority of submissions are supportive of the project. On balance, the amenity and ecological outcomes of the project are positive, moving from a dilapidated and haphazardly-armoured shoreline to a safe, revitalised public open space.

10. ISSUES RAISED IN THE SECTION 42A REPORT

- 10.1 I have reviewed the Section 42A reports prepared by Ms. Janice Carter (Christchurch City Council) and Ms. Olivia Murray (Canterbury Regional Council). I note the favourable recommendation to grant the consents subject

to conditions. The following paragraphs address the strategic and governance topics raised that fall within my area of expertise.

Strategic Mandate and Compliance with the NZCPS

- 10.2 Both reports acknowledged tension regarding the project's compliance with forward-looking policies of the NZCPS, due to the design being based on a 20-year timeframe rather than the 100-year horizon required for managing coastal hazards.
- 10.3 I confirm that the project's mandate, stemming from the Council resolution, is to deliver earthquake legacy protection to restore pre-CES levels of service. The 20-year duration and design life represent a transitional mechanism that provides immediate protection to public and private assets while the long-term decisions of the CHAP Programme are developed and agreed with the community. This approach is consistent with the intent of NZCPS Policy 27(1)(5), to identify and plan for transition mechanisms.
- 10.4 By actively managing and maintaining this 20-year transition, we are enabling the social and economic wellbeing of the community, which is fundamental to the purpose of the RMA (Part 2).

Rationale for Edge Protection Choices

- 10.5 I note the technical advice from Mr Bruce Gabites (CRC), regarding the preference for softer engineered structures where feasible and his preference for a universal cobble beach. The final selection of erosion protection types across the shoreline, was made to achieve the Best Practicable Option for the project, taking all factors into account.
- 10.6 The decision to use rock revetment in places was a governance choice to uphold the project's primary objective: delivering resilient, 20-year earthquake legacy protection to the inundation bund and adjacent public/private assets. This mitigates the risk of ongoing structural failure which would have social and financial consequences for the community, and reputational damage for Council. I rely on the Coastal Engineer for the detailed design defence, but it is my opinion that this structure selection is the most responsible choice to manage operational risk during this transitional period.

Selection of gabion baskets at SNBP was required to protect identified midden sites, of significance to mana whenua. This illustrates the balance

required across the project in order to balance engineering safety, cultural heritage protection, community desires, recreational coastal access and environmental impact minimisation.

Assurance on Management Plans

- 10.7 Both s42A reports emphasise reliance on the proposed suite of management plans to ensure adverse effects remain minor.
- 10.8 I confirm the Council's commitment to implement all management plans offered in the Revised Proposed Conditions attached to Ms Bould's evidence, including the Saltmeadow Remediation Plan (SRP), the Seagrass and Saltmarsh Management Plan (SSMP), and the Construction Environment Management Plan (CEMP).
- 10.9 I note the competing technical advice regarding avifauna protection, particularly the differing mitigation proposals put forward by our project expert, Dr Leigh Bull, and the Council's ornithologist, Mr Andrew Crossland.
- 10.10 While the CCC s42A report suggested a Bird Management Plan (BMP) to satisfy concerns, the project team's position, as advised by Dr. Bull, is that the required outcomes are already delivered through the proposed project-specific consent conditions. These conditions, which address timing of works, pre-work nest searches and disturbance mitigation are detailed in Dr Bull's evidence.
- 10.11 This approach avoids creation of a further standalone document, delivering the Best Practicable Option for avifauna protection. I support the detailed rationale provided by Dr Bull, which demonstrates that the proposed conditions adequately mitigate effects on protected avifauna populations without adding complexity that does not contribute meaningfully to environmental protection outcomes.

Public Access and Amenity

- 10.12 I note the CCC s42A report highlights the community opposition to the reduction in the number of formal estuary access points, reflecting a conflict between the desire to enhance amenity and the necessity for ecological protection. This issue of balancing public access with environmental sensitivity is fundamental to managing open space along the CMA, as required by the RMA.

- 10.13 As detailed in my response to the Avon-Heathcote Estuary Ihutai Trust (Section 9.7), the decision to restrict formal access points to three locations was a negotiated ecological protection measure. This approach keeps public access a minimum of 30 metres away from the highly sensitive seagrass beds.
- 10.14 While the Council acknowledges the community's desire for more access points, the final design prioritises compliance with the ecological avoidance measures necessary to safeguard the Estuary's significant biodiversity. The provision of three controlled access points replaces 29 uncontrolled access points and, combined with the new continuous shared pathway, enhances the overall amenity and connectivity of the area.
- 10.15 The final siting of further amenity features (like the nature play area) and internal pathways will proceed under the certified landscape plan but will involve further consultation with adjacent residents during the detailed design phase to ensure amenity effects are minimised, addressing the submissions raised in the CCC s42A report.

11. CONCLUSIONS

- 11.1 The Southshore and South New Brighton Park Estuary Edge Project aims to resolve over a decade of community uncertainty and vulnerability following the Canterbury earthquakes. It replaces a deteriorating, ad-hoc shoreline with a cohesive solution that protects both public and private property and infrastructure. By limiting the consent duration to 20 years, we have ensured that this immediate protection does not predetermine future decision-making regarding long-term climate adaptation.
- 11.2 The project delivers a range of broader benefits, including removal of contaminated debris, an increased area of soft sediment habitat, protection of archaeological midden sites and improvements to the quality of public open space. The refinements made post-lodgement demonstrate Council's commitment to minimising adverse effects and listening to stakeholders.
- 11.3 I rely on the technical evidence of the Applicant's experts which confirms that potential adverse effects of the works can be appropriately managed through the proposed conditions. With the support of the Section 42A reporting officers, I submit that the Project achieves the purpose of the RMA by enabling the safety and wellbeing of the Southshore and South New Brighton

communities while sustaining the natural character of the coastal environment.

David John Little

Dated 22 November 2025

Appendix 1: Reclamation and Declamation Plans

Appendix 2: Landscape Concept Plans

Appendix 3: Engineering Plans