

7 July 2023

Waimakariri District Council
215 High Street
Rangiora

Tēnā koe

Proposed Waimakariri District Plan – Hearing Stream 3 and Natural Hazards Chapter

Fulton Hogan has one submission point relating to Hearing Stream 3 and the Natural Hazards (NH) chapter of the proposed Waimakariri District Plan. Fulton Hogan is seeking a new policy that recognises the role of activities that allow communities to recover from the adverse effects of natural hazards and climate change in providing for social, economic and cultural resilience as follows:

Provide for activities that enhance social, economic and cultural resilience in response to the adverse effects of natural hazards and climate change including activities that enhance the community's ability to recover.¹

As discussed in the evidence of Tim Ensor for Stage 1 of this hearing, aggregate literally forms the foundation of the infrastructure and buildings that we rely on, is a high-volume low-cost material with transportation making up a significant cost of the product, and therefore there are significant cost advantages from having quarries located close to the point at which aggregate is used.² This advantage was observed in Christchurch following the Canterbury Earthquake Sequence, where having a local aggregate supply available minimised the transportation costs associated with rebuild and recovery efforts. The rationale behind Fulton Hogan's submission is to enable this advantage for the Waimakariri District in order to increase resilience to natural disasters and climate change risks.

The S42A Officer has rejected Fulton Hogan's submission on the basis that: *"Policy NH-P16 already addresses redevelopment and relocation in coastal hazard and natural hazard overlays where these reduce the risk of adverse effects from natural hazards, including managed retreat and designing for relocation or recoverability from natural hazard events."*

Policy NH-P16 is squarely focused on reducing the risk of adverse effects from natural hazards through changes in development or land use, rather than considering the building material or waste management requirements (for example) of recovery and resilience. On this basis, Fulton Hogan remains of the view that there are benefits to having policy that supports activities that enhance social, economic and cultural resilience in response to the adverse effects of natural hazards and climate change, in order to direct decision makers to take into account the resilience benefits of an activity where these exist.

¹ 41.22

² Tim Ensor, Evidence in Chief for Stage 1 - , Definitions, Strategic Direction and Urban Form and Development, from paragraph 26.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Helen Caley', written in a cursive style.

Helen Caley
National Resource Consents Planner