

Form 6

Further Submissions on the Proposed Waimakariri District Plan

To: Waimakariri District Council
215 High Street
Rangiora

Submitter: Fulton Hogan Limited

This is a further submission by Fulton Hogan Limited (Fulton Hogan) on the proposed Waimakariri District Plan.

Fulton Hogan has an interest in the proposal that is greater than the interest of the general public. This is because submissions have been made which, if relief is granted as sought, have the potential to positively or adversely impact on the ability of Fulton Hogan to operate their business in an efficient and effective manner.

The table annexed as **Appendix A** and forming a part of this further submission contains:

- a) The submissions which Fulton Hogan supports or opposes,
- b) The particular parts of those submissions supported or opposed,
- c) Reasons for support or opposition, and
- d) The decision sought by Fulton Hogan (whether the submission should be allowed or disallowed).

Fulton Hogan wishes to be heard in support of its further submission.

If others make a similar submission, Fulton Hogan will consider presenting a joint case with them at a hearing

Signed on behalf of
Fulton Hogan



Dated 24 November 2022

Address for Service of Submitter:

Tonkin + Taylor Ltd
Level 3, PwC Centre, 60 Cashel Street, Christchurch 8013
PO Box 13055, Christchurch
Attn: Tim Ensor

Phone +64 21 486 203
Email tensor@tonkintaylor.co.nz

Appendix A: Further Submissions

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
1	Christchurch International Airport Limited	Oppose	254.4 New definition – Bird Strike	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
2	Christchurch International Airport Limited	Oppose	254.31 EI-P6	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed
3	Christchurch International Airport Limited	Oppose	254.101 GRUZ-R12	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
4	Christchurch International Airport Limited	Oppose	254.102 GRUZ-R30	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed
5	Christchurch International Airport Limited	Oppose	254.112 RLZ-R12	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
6	Christchurch International Airport Limited	Oppose	254.112 RLZ-R31	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed
7	Christchurch International Airport Limited	Oppose	254.119 RURZ - Matters of Discretion for all Rural Zones	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
8	Christchurch International Airport Limited	Oppose	254.132 GRUZ - General Rural Zone	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed
9	Christchurch International Airport Limited	Oppose	254.133 RLZ - Rural Lifestyle Zone	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
10	Christchurch International Airport Limited	Oppose	254.144 RURZ - Matters of Discretion for all Rural Zones	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed
11	Christchurch International Airport Limited	Oppose	254.150 Planning Maps	<p>Christchurch International Airport Limited (CIAL) seek a number of amendments pertaining to bird strike risks, including identifying quarries as a bird strike risk, and an extensive 13km radius for bird strike provisions as well as supporting policy amendments. CIAL sought similar amendments through the recent Independent Hearings Panel (IHP) process that considered the Christchurch Replacement District Plan (CDP). The IHP considered these submissions and evidence from the Airport and other parties and concluded that a bird strike management area extending 3 km from the end of the CIAL runways was appropriate and no more.</p> <p>CIAL staff have previously acknowledged these decisions through the proposed Fulton Hogan Roydon Quarry consenting process (in the Selwyn District) where CIAL sought to control activities at the site, approximately 8 km from the end of the runway.</p> <p>While Fulton Hogan regularly works with CIAL to ensure the potential for bird strike is appropriately managed, the amendments sought by CIAL are inappropriate. It is noted a number of ponds or bird attracting activities could be established on other sites as of right within Christchurch City Council territorial boundaries, which means the requested amendments would create an inconsistent planning system for effects on airport operations, while also seeking to implement planning controls previously considered in detail and rejected by the IHP.</p> <p>The submissions seek to unduly limit other activities that are a considerable distance from Christchurch International Airport, do not represent sustainable management and is contrary to other planning documents and the purpose and principles of the RMA.</p> <p>For the avoidance of doubt these further submissions relate to all submission points by CIAL which seek to achieve these bird strike controls as they may impact quarrying activities including objective and policy amendments and map amendments.</p>	That the submission be disallowed

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
12	Christchurch City Council	Oppose	360.20 RURZ - General Objectives and Policies for all Rural Zones	The submission requests that the General Objectives and Policies for all Rural Zones and the Rural Lifestyle Zone, are amended so as to protect highly productive land/versatile soils from fragmentation and unsuitable 'primary production' activities such as forestry or quarrying. Quarrying and the long term productive capacity of land are not mutually exclusive. In addition, the National Policy Statement for Highly Productive Land now outlines a pathway for quarrying activities to occur on highly productive land. Therefore the amendments sought by the submitter are unnecessary.	That the submission be disallowed
13	Christchurch City Council	Oppose	360.21 RLZ - Rural Lifestyle Zone	The submission requests that the General Objectives and Policies for all Rural Zones and the Rural Lifestyle Zone, are amended so as to protect highly productive land/versatile soils from fragmentation and unsuitable 'primary production' activities such as forestry or quarrying. Quarrying and the long term productive capacity of land are not mutually exclusive. In addition, the National Policy Statement for Highly Productive Land now outlines a pathway for quarrying activities to occur on highly productive land. Therefore the amendments sought by the submitter are unnecessary.	That the submission be disallowed

Addresses of submitters

Submitter	Address
Christchurch International Airport Limited	c/- Amy Hill Chapman Tripp 60 Cashel Street PO Box 2510 Amy.Hill@chapmantripp.com
Christchurch City Council	planchange@ccc.govt.nz