

15 Sir William Pickering Drive
Harewood
PO Box 39185
Christchurch 8545
Telephone + 64 3 357 1400
www.fultonhogan.com

17 December 2024

Submission on Plan Change 1
Dunedin City Council
PO Box 5045
Dunedin 9054

Via email: districtplansubmissions@dcc.govt.nz

Submission on Dunedin City Council's Plan Change 1 – Minor Improvements to the Partially Operative Second Generation Dunedin City District Plan 2024

1. This is a submission by Fulton Hogan Limited (Fulton Hogan) on Plan Change 1 to the Partially Operative Second Generation Dunedin City District Plan (2GP).

About us

2. Fulton Hogan is one of New Zealand's largest roading and infrastructure construction companies, employing close to 6,000 staff in New Zealand. We are proudly New Zealand owned and operated.
3. Fulton Hogan was founded in Dunedin and has strong ties to the city. We directly employ over 120 staff in Dunedin, and many other jobs are supported through the use of subcontractors and other subsidiary services. We have a proud history of road and infrastructure construction and maintenance, and these activities sit within a diverse operational portfolio that includes quarrying and sale of aggregate products, importation and use of bitumen, production and use of asphalt, laboratory services to support these industries, and construction.

Comments on 2GP Plan Change 1

4. Fulton Hogan is an advocate for Planning documents that are clear and easy to implement, and support many of the suggested changes in 2GP Plan Change 1. Our comments are in Table 1.

Closing

5. Thank you for providing an opportunity to comment on these proposed District Plan changes.

Yours sincerely



Helen Caley
National Resource Consents Planner

Change reference	Support / oppose	Comment	Relief requested
D18 – definition of ground level	Support	We agree that this change will make the definition easier to implement, particularly on sites that we own which have been excavated or filled in the past and where it may not be clear what the natural ground level would have been.	Retain as notified
PHS6 – construction noise controls.	Support in part	<p>In general, we are supportive of providing for higher noise limits on a temporary basis for construction. This allows short-term construction activities to be undertaken efficiently, without requiring a resource consent. These activities are often necessary to construct and maintain the city’s infrastructure. We also support adding site investigation into the rule.</p> <p>However, we do not agree that there should be lower noise limits for noise sensitive activities within the Industrial and Port zones. These activities are not permitted within these zones, and would require resource consent (likely with additional mitigation measures) to be present. We consider that it reduces the utility of the zone to provide specifically for noise sensitive activities in the rule.</p>	<p>Fulton Hogan requests the following relief:</p> <p>4.5.4.1 (a)(iii) Construction and site investigation noise received in the following locations must not exceed the noise limits in the following table, except where Rule 4.5.4.1.X applies:</p> <ol style="list-style-type: none"> 1. _____ at any building within CBD, WP, PPH, HE, CEC, SDLF, and TR; and 2. _____ at buildings housing a noise sensitive activity in industrial and Port zones;
TA4 – provide for the use and storage of relocatable construction site offices, plant, tools, gear and materials associated with construction activities.	Support in part	<p>We agree that this change will make it easier to undertake typical construction and maintenance activities (particularly of the roading network and similar infrastructure) without the need for a resource consent. However, we consider the hours in activity standard 4.5.3.4 are unnecessarily restrictive.</p> <p>Construction sites typically begin work at 7 or 7.30am, and only allowing access to stored materials and site offices from 7.30am would</p>	<p>Relief requested:</p> <p>4.5.3.4 Construction and site investigation {Change TA4; Change Earth1}</p> <p>a) Off-site use and storage of plant, tools, gear, materials or relocatable site offices as part of construction and site investigation must:</p> <p>i. not exceed a maximum duration of 20 weeks per site in any 12 month period; and</p>

		<p>prevent quiet site set-up activities from being undertaken (eg. health and safety briefings and start work meetings). Altering this to 7am would also be consistent with the day-time noise standards for temporary activities.</p>	<p>ii. only be accessed between 6.307.30am and 8.006.00pm on weekdays and <u>7.30am and 6.00pm on Saturdays</u>, except public holidays.</p> <p>b) Activities that contravene this performance standard are restricted discretionary activities. {Change TA4}</p> <p>5.5.12 Maximum duration, frequency, and hours of operation – to be added {Change TA4}</p> <p>1. Off-site use and storage of plant, tools, gear, materials or relocatable site offices as part of construction and site investigation must:</p> <p>a) not exceed a maximum duration of 20 weeks per site in any 12 month period; and</p> <p>b) only be accessed between 6.307.30am and 8.006.00pm on weekdays and <u>7.30am and 6.00pm on Saturdays</u>, except public holidays.</p> <p>2. Activities that contravene this performance standard are restricted discretionary activities. {Change TA4}</p> <p>6.5.3 Maximum duration, frequency, and hours of operation – to be added {Change TA4}</p> <p>1. Off-site use and storage of plant, tools, gear, materials or relocatable site offices as part of construction and site investigation must:</p> <p>a) not exceed a maximum duration of 20 weeks per site in any 12 month period; and</p> <p>b) only be accessed between 6.307.30am and 8.006.00pm on weekdays and <u>7.30am and 6.00pm on Saturdays</u>, except public holidays.</p> <p>2. Activities that contravene this performance standard are restricted discretionary activities. {Change TA4}</p>
--	--	--	--