



# memorandum

TO Tim Carter FROM Lizzie Civil  
Carter Group Limited DATE 28 April 2026  
RE Response to: Ryan Road Industrial Development Substantive Fast Track Application  
Draft Decision – Airways and Christchurch International Airport Limited comments  
on draft condition relating to Wildlife Hazard Management

## 1.0 Overview

Airways and Christchurch International Airport Limited (CIAL) have commented on the draft Wildlife Hazard Management Plan (WHMP) and conditions proposed by Carter Group Limited (CGL). PDP has reviewed these comments from an ecological bird hazard management perspective.

The comments from Airways and CIAL have been grouped in this memorandum into key themes relating to stormwater management, landscaping, WHMP structure and implementation, certification, and long-term management across the development. While CIAL does not dispute the underlying ecological assessment or the conclusion that the development is unlikely to increase overall bird strike risk, the comments focus on ensuring that mitigation measures are appropriately secured, implemented, and maintained in practice across the full development lifecycle.

This memorandum provides ecological input on the matters raised and identifies recommended areas where the consent conditions may benefit from clarification or strengthening in response to Airways and CIAL's comments. It is anticipated that detailed drafting of any subsequent amendments to the conditions will be undertaken by Novo Group Limited.

## 2.0 Stormwater management and bird attractance

CIAL has raised concerns regarding reliance on design assumptions that stormwater infrastructure will not result in ponding or bird-attracting conditions.

Permanent or semi-permanent water bodies are a known attractant for bird species, particularly opportunistic and urban-adapted gulls. The stormwater design has been revised to a Filterra Bioscape system (and secured via consent conditions), which is intended to achieve rapid infiltration and avoid standing water, except during rare, high-intensity rainfall events. This approach is reflected in the draft WHMP, including monitoring requirements following extreme rainfall events.

Given the revised design, the risk of bird attraction associated with stormwater has been addressed at source. While Airways/CIAL seek additional certainty through consent conditions, the combination of the stormwater design and WHMP provisions is considered sufficient for managing risk. Any further conditions should therefore be carefully considered to avoid duplication of measures already embedded within the design and management framework, or contained within the following existing conditions:

- Christchurch City Council (CCC) Land Use Condition 16 that is now proposed by CGL to include the following wording: "Any change in ground levels must not (b) cause ponding within the site"

- ∴ CCC Subdivision Condition 31 that contains the same wording as above.
- ∴ CCC Subdivision Condition 61 that specifies the Filterra Bioscape system that results in rapid infiltration.

### 3.0 Landscaping controls

CIAL has identified the potential for landscaping to create unintended bird attractants if not appropriately controlled.

At subdivision stage, planting species within the 3 m road frontage strips, SMA's and roads have been selected in accordance with specialist avifauna advice and the District Plan Bird Strike Management provisions. In addition, species have been specifically chosen for this development based on ecological characteristics including low food resource value, reduced canopy structure and density, and generally low bird attractance relative to other native species.

These planting principles are embedded within the WHMP to ensure consistent implementation across the site. The DCM Urban Design landscape plans (which were reviewed, with input provided by PDP) are also secured in the subdivision consent conditions in relation to the 3 m road boundary landscape strip (condition 85), reserves (condition 88 and 89 including advice note) and street trees (condition 95 including advice note). From an ecological bird hazard management perspective, the DCM Urban Design proposed landscape plans are considered appropriate, sufficient to manage bird attractancy risk and are supported by PDP.

While it is acknowledged that CIAL seeks additional certainty through consent conditions, it is not considered necessary from a bird strike risk standpoint for these matters to be duplicated as further standalone conditions. Replicating detailed landscaping controls within both the WHMP and consent conditions would introduce unnecessary complexity without materially improving ecological outcomes or bird strike risk outcomes.

### 4.0 WHMP structure and reliance

CIAL has raised concerns that the WHMP currently includes a broad range of mitigation measures without sufficient supporting enforceable conditions.

The WHMP is appropriately structured as the primary implementation tool for managing bird strike risk across both construction and operational phases. It provides a consolidated and adaptive framework for managing a range of potential attractants in an integrated manner, which is particularly important given the staged nature of the development. The use of a WHMP is a common and accepted approach for managing risk in developments in proximity to airports. The draft WHMP and conditions proposed by the Applicant are consistent with, and in many respects exceed, the normal industry standard expected for a development of this type in this location.

While it is acknowledged that certain permanent design outcomes may also be reflected in consent conditions where appropriate, it is not considered necessary for all WHMP measures to be replicated as standalone conditions. Doing so risks duplication and reduced flexibility in implementation without necessarily improving ecological outcomes. The current approach of combining targeted consent conditions with WHMP implementation is considered sufficient to manage bird hazard risk in a coordinated and effective manner.

## 5.0 WHMP certification and implementation

CIAL has raised concerns regarding WHMP certification and the clarity of its implementation across construction and operational phases.

It is intended that the WHMP is finalised and certified prior to the commencement of initial subdivision works, with certification confirming that relevant aviation safety matters have been addressed, including engagement with CIAL. It is also appropriate from an ecological bird hazard management perspective that the WHMP applies across both construction and operational phases, as bird hazard risk can arise from temporary construction activities as well as long-term land use and site management.

## 6.0 Implementation across development stages

CIAL has highlighted the need for clearer separation between obligations applying at subdivision stage and those applying to future landowners.

PDP maintain its earlier evidence that the draft WHMP, together with the proposed consent conditions, provide a robust and enforceable framework for managing bird attraction and bird strike risk during construction and operation of the proposed development. Bird hazard risk is most effectively managed where system-wide design decisions are secured at the subdivision stage, prior to title creation. Ongoing site-specific activities can also then be managed through appropriate mechanisms such as consent notices on titles (as proposed by the Applicant). This approach reduces the risk of inconsistent implementation across multiple landowners and ensures mitigation measures are embedded at the design stage where they are most effective.

The Applicant has included an Industrial Park Management Entity Condition (subdivision condition 1AA) within the updated proposed conditions, should the Panel consider that additional certainty is needed around the ongoing implementation of the WHMP.

While this proposed condition would provide further support to the WHMP, it is our view consistent with our earlier ecological evidence, that the draft WHMP and the existing consent framework are sufficient to achieve appropriate ecological and bird strike risk management outcomes. An additional enduring management condition is therefore not considered necessary from an ecological perspective. However, the proposed condition could offer increased continuity and provide greater confidence that management measures will be consistently implemented over time, as sought by CIAL.

The condition, as drafted by Novo Group, aligns with the ecological recommendations and does not alter the role of the draft WHMP as the primary mechanism for implementing bird strike risk management.

## 7.0 Summary

Airways and CIAL's comments focus on improving clarity and consistency in how bird hazard mitigation measures are implemented across the site's development lifecycle, particularly in relation to stormwater, landscaping, and staging of obligations.

The WHMP provides an appropriate and sufficient framework for managing bird strike risk across both construction and operational phases. It consolidates key mitigation measures into a single implementation tool that can be applied consistently across the development.

Notwithstanding this, there are specific areas where additional clarity or targeted strengthening of consent conditions may be appropriate to support the WHMP, including:

- ∴ ensuring stormwater design avoids permanent or persistent ponding that may attract birds; and,
- ∴ clearly distinguishing subdivision-stage controls from ongoing site-level management responsibilities.

These refinements have been addressed through detailed condition drafting by Novo Group, informed by the ecological recommendations provided, without undermining the WHMP as the primary implementation framework.

### Limitations

This memorandum has been prepared by Pattle Delamore Partners Limited (PDP) on the basis of information provided by Carter Group Limited (CGL) and Novo Group Limited. PDP has not independently verified the provided information and has relied upon it being accurate and sufficient for use by PDP in preparing the memorandum. PDP accepts no responsibility for errors or omissions in, or the currency or sufficiency of, the provided information.

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