

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-380
Response Date	1/05/15 10:21 AM
Consultation Point	13 MANDATORY INFORMATION (View)
Status	Submitted
Submission Type	Letter
Version	0.2
TRIM Doc No:	C15C/61055
To Be Heard	
Please select the appropriate option from the following:	I DO wish to be heard in support of my submission;

If so

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-295
Response Date	28/04/15 11:21 PM
Consultation Point	Proposed Canterbury Air Regional Plan (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.

CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Air Shed

Which Air Shed does this submission relate to or none

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-920
Response Date	28/04/15 11:21 PM
Consultation Point	7.6 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.4
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Amend rule 7.6 to correct reference from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service."

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-921
Response Date	28/04/15 11:21 PM
Consultation Point	7.14 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Support

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.

CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Amend rule 7.14 to allow discretion to be applied when boundaries are shared with land uses and activities that are excluded from the plan.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-922
Response Date	28/04/15 11:21 PM
Consultation Point	7.18 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3

Support Oppose

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.

CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Oppose rule 7.18. No decision requested.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-923
Response Date	28/04/15 11:21 PM
Consultation Point	7.19 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.4
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and
CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.
- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.
CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).
- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Delete rule 7.19 (3).

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-924
Response Date	28/04/15 11:21 PM
Consultation Point	7.19 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Delete rule 7.19 (3).

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Reject

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-925
Response Date	28/04/15 11:21 PM
Consultation Point	7.19 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3

Support Oppose

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.

CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Insert condition that exempts consented boilers installed prior to the Proposed Air Plan being notified.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-926
Response Date	28/04/15 11:21 PM
Consultation Point	7.20 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Delete 7:20 (4).

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-927
Response Date	28/04/15 11:21 PM
Consultation Point	7.20 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.

CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Insert condition to rule 7.20 that exempts consented boilers installed prior to the Proposed Air Plan being notified.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-928
Response Date	28/04/15 11:21 PM
Consultation Point	7.25 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Delete 7.25(1).

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-929
Response Date	28/04/15 11:21 PM
Consultation Point	7.29 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
 - 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset
- Statutory Framework
- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
 - 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
 - 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
 - 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Insert a condition to rule 7.29 that requires any activity that may create a significant dust impact within three kilometres of land owned or managed by the submitter must submit a Dust Management Plan to the submitter for approval, demonstrating how the dust will be managed and including emergency contact details.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-930
Response Date	28/04/15 11:21 PM
Consultation Point	7.30 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.2
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.

CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and
CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.
- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.
CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).
- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Insert a condition to rule 7.30 that requires any activity that may create a significant dust impact within three kilometres of land owned or managed by the submitter must submit a Dust Management Plan to the submitter for approval, demonstrating how the dust will be managed and including emergency contact details.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-931
Response Date	28/04/15 11:21 PM
Consultation Point	7.31 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.5
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited (“CIAL”) lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan (“pCARP”).
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL’s submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:
 - 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
 - 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.

- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from “Christchurch International Airport Rescue Service” to “Christchurch International Airport Fire Service”.
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.
- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to

train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

- 4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

To: Canterbury Regional Council Environment Canterbury

PO Box 345 Christchurch 8140

C/- mailroom@ecan.govt.nz Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Ltd PO Box 14001

Christchurch (For the attention of: Brodie Akacich)

Introduction

- 1 1 Christchurch International Airport Limited ("CIAL") lodges this submission on the entire proposed Canterbury Air Regional Plan.
- 2 2 CIAL wishes to thank the Environment Canterbury for the opportunity to provide a submission to the proposed Canterbury Air Regional Plan ("pCARP").
- 3 3 CIAL recognises the requirements of Environment Canterbury to ensure consistency between this regional plan and the National Environment Standards.
- 4 4 With regards to this need for consistency and need to improve air quality in Christchurch, CIAL's submission provides general support for the plan, however we do oppose certain rules which may limit the operational ability of the Airport in the long term due to potential impacts on growth.
- 5 5 CIAL seeks to place emphasis on the following matters:

- 1 The Airport is a strategic piece of infrastructure to the South Island and that operational limits on the airport will have flow on impacts to the region and the South Island of New Zealand. This impact includes but is not limited to the regional economy, emergency response, tourism and as a gateway port into New Zealand.
- 2 Recognition of the Special Purpose (Airport) Zone (SPAZ) zoned in the Christchurch City Council City Plan, and that activities occurring on the airport are unique to our land use and that activities relating directly to Aviation should be permitted under the plan.

PO Box 14001 Christchurch 8544 New Zealand Telephone (+64 3) 358 5029 Facsimile (+64 3) 353 7730

christchurchairport.co.nz

- 1 Ability to run our emergency power generators unhindered in the event of an emergency or natural disaster.
- 2 Ability to operate existing Heating and Cooling plant for the duration of the planned life of that asset

Statutory Framework

- 1 6 Christchurch International Airport Limited is a critical piece of significant national and regional infrastructure.
- 2 7 The Airport has statutory significance under the Airports Authorities Act 1966 and is identified in the Canterbury Regional Policy Statement (CRPS).
- 3 8 The CRPS identifies the Christchurch International Airport as Regionally Significant Infrastructure, and seeks to ensure that its operational capacity is safe, efficient and effective, and is unencumbered by incompatible activities. Similarly, the proposed District Plan Review (pDPR) identifies the Christchurch International Airport as strategic infrastructure. The pDPR also broadly seeks integrated patterns of land use and infrastructure.
- 4 9 CIAL currently operates under multiple Discharge to Air consents including but not limited to:
 - 1 CRC961923
 - 2 CRC030981
 - 3 CRC031225
 - 4 CRC070531
 - 5 CRC074176
 - 6 CRC101945

Comments on rules proposed in the proposed Canterbury Air Regional Plan

- 1 10 Rule 7.3: The wording of this rule allows for activities directly related to Aircraft Operation, Aircraft Idle Testing, Aircraft Repairs and Fire Training which are excluded from the plan to be then assessed under Schedule 2 and considered a non-complying activity.
CIAL seeks certainty that these activities remain excluded from the plan.
- 2 11 Rule 7.6: CIAL agree with this rule, however request that the name for our fire service is corrected from "Christchurch International Airport Rescue Service" to "Christchurch International Airport Fire Service".
- 3 12 Rule 7.14: As CIAL sits adjacent to the western boundary of a gazetted air shed, any PM10 impacts would only occur in wind conditions tending from the West. While it is unlikely that emissions from our boilers would be at the trigger level of rule 7.14 at ground level this would be difficult to quantify due our boundary being Russley Road and results being compromised by traffic on this road.

CIAL is not opposed to this rule however would suggest that a discretion be applied when boundaries are shared with land uses and activities that are excluded from the pCARP.

- 1 13 Rule 7.18: CIAL is opposed to this rule as it may limit future growth opportunities for the airport. Any limit to airport growth would have a compounding effect on the Canterbury and South Island economy.

- 2 14 Rule 7.19: CIAL are opposed to rule 7.19 (3) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

- 3 15 Rule 7.20: CIAL are opposed to rule 7.20 (4) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit. We also request that a condition be added that exempts consented boilers installed prior to the pCARP being notified.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 4 16 Rule 7.25: CIAL are opposed to rule 7.25 (1) and requests that the condition be removed on the basis that the effects of the activity are less than minor already and the condition does not result in a benefit.

There are further restrictions to the height at which fixed structures can be built to before penetrating the Airport Protection Surfaces. These are described in the Christchurch City Council City Plan: Volume 3 : Part 9 General City Rules : 6.0 Airport Protection Surfaces

- 5 17 Rule 7.29: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval, demonstrating how dust will be managed and emergency contact details.

- 1 18 Rule 7.30: CIAL agrees with this rule as it is complementary to requirements CIAL places on its developments due to the potential impacts of dust to air traffic. Apart from the potential issues to aircraft from reduced visibility, there are further potential impacts from dust to Jet Aircraft whereby engines may be damaged due to ingestion of dust.

Further to the conditions stated in this rule, CIAL recommends that any activity that may create significant dust within 3 kilometres of land owned or managed by CIAL must submit a Dust Management Plan to CIAL for approval demonstrating how dust will be managed and emergency contact details.

- 2 19 Rule 7.31: CIAL request that the burning of certain materials included on this list is a Permitted Activity for the Christchurch International Airport Fire Service. This is to allow for Fire Fighters to train with these materials that may be encountered when responding to a range of emergencies including but limited to fires involving Aircraft, Offices, Retail stores, Residential houses, Vehicles and Warehouses located on Airport or off airport when called upon by the New Zealand Fire Service.

The requested materials include:

- 1 Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and
- 2 Wood which is painted, stained or oiled; and

CIAL also requests that the airport is notified as an affected party for any application within 3 kilometres of land owned or managed by CIAL as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

- 3 20 Rule 7.34: Jet A1 has a distinct odour and can in rare events be smelt from some distance, potentially to the site boundaries. While refuelling of aircraft and the resupply of fuel farms occurs

in areas owned by CIAL, the activity is not under our control but is regulated by a number of legislative instruments and standards.

CIAL would recommend that additional restrictions are not placed on this activity as it is a highly controlled activity and any odour impacts would be short term (0-30 mins).

4 21 CIAL does wish to be heard in support of this submission.

Dated 24 April 2015

_____ Brodie Akacich

Environment Manager Christchurch International Airport Limited

Address for service:

PO Box 14001 Christchurch 8544 P: 03 364 5734 E: Brodie.Akacich@cial.co.nz

Please summarise decision requested

Planner - Summary of Decision Requested

Amend rule 7.31 to state that the burning of materials listed in the rule is a permitted activity for the Christchurch International Airport Fire Service. The requested materials include: Wood treated or processed with preservatives, gluing agents, or impregnated with chemicals; and Wood which is painted, stained or oiled; and

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-932
Response Date	28/04/15 11:21 PM
Consultation Point	7.31 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.3

Support Oppose

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please summarise decision requested

Planner - Summary of Decision Requested

Amend rule 7.31 to require the airport to be notified as an affected party for any application within three kilometres of land owned or managed by the submitter as smoke or thermal updrafts may impact on aircraft landing or taking off from Christchurch International Airport.

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Reject

Tick relevant topics

Make Submission

Consultee	Mr Brodie Akacich (61504)
Email Address	brodie.akacich@cial.co.nz
Company / Organisation	Christchurch International Airport Limited
Address	PO Box 14001 Christchurch 8544
Event Name	Proposed Canterbury Air Regional Plan
Submission by	Christchurch International Airport Limited (Mr Brodie Akacich)
Submission ID	pCARP-933
Response Date	28/04/15 11:21 PM
Consultation Point	7.34 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.4

Support Oppose

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please summarise decision requested

Planner - Summary of Decision Requested

Amend rule 7.34 to ensure that additional restrictions are not placed on the refuelling of aircraft and the resupply of fuel farms, as it is a highly controlled activity and any odour impacts are short term (0-30 minutes).

Air Shed

Which Air Shed does this submission relate to or none . Not Air Shed Related

Choose one of the following three . Recommend Accept in Part

Tick relevant topics