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Cc: [Mailroom Mailbox](#)
Subject: AIRWAYS CORPORATION LIMITED FURTHER SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN
Date: Thursday, 9 July 2015 9:48:42 a.m.
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[Airways Corporation Ltd - Further Submission - Proposed Canterbury Air Regional Plan.pdf](#)

Dear Sir/Madam

On behalf of Airways Corporation Ltd

Please find attached a set of further submissions that was made on Environment Canterbury's Proposed Canterbury Air Regional Plan lodged by Airways Corporation Limited on 8 July 2015.

Kind Regards,

George Enersen



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8 July 2015

Environment Canterbury
PO Box 345
Christchurch 8140

Dear Sir/ Madam

**AIRWAYS CORPORATION LIMITED – FURTHER SUBMISSION –
PROPOSED CANTERBURY AIR REGIONAL PLAN 2015**

Airways Corporation Limited (Airways) is making further submissions on the Proposed Canterbury Air Regional Plan.

Airways Corporation Limited confirms it is a person that represents a relevant aspect of the public interest. Airways has principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace. Ensuring this responsibility is protected is a relevant aspect of the public interest.

The enclosed submission table consists of:

- The Submitter and ID Point of the submission that Airways supports or opposes
- The particular parts of the submission that are supported or opposed
- The reasons why Airways supports or opposes the submission

Airways confirms its submission does not relate to trade competition or the effects of trade competition.

Airways wish to be heard in support of its submission.

Regards

George Enersen
Resource Management Planner
For and behalf of Airways Corporation Limited

Address for Service:
Opus International Consultants Limited
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03 363 5567



Airways Corporation Ltd
 Further Submission – Proposed Canterbury Air Regional Plan

Submitter / Person ID	Submission Point ID	Original Submission Statement	Support or Oppose	Reasons
Radio New Zealand Limited (62952), St George's Hospital Limited (63131), Trustpower Limited (63182), & Transpower limited (63159)	pCARP - 376, pCARP - 819, pCARP - 2560, pCARP - 2841	Retain Rule 7.24 <i>Rule 7.24: "The discharge of contaminants into air, for the purpose of emergency electricity generation, maintenance and peak electricity network load management, from the combustion of diesel, petrol, liquefied petroleum gas or compressed natural gas in any stationary large scale internal combustion device with a net energy output capacity up to and including 300kW is a permitted activity provided the prescribed conditions are met"</i>	Support.	This rule allows Airways greater flexibility to establish a generator (less than 300kw) for the purposes outlined in the rule as a permitted activity.
Christchurch International Airport Limited (61504)	pCARP - 928	Rule 7.25: CIAL are opposed to rule 7.25 Condition (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.	Support.	This will constrain future improvements to services provided by Airways. Removing this condition will enable Airways greater flexibility for installing generators that can be used during emergency or low electricity periods.
Christchurch International Airport Limited (61504)	pCARP - 929	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.	Support.	Airways has principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace. Airways' core business (air navigation services), comprises air traffic control, air traffic

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Submitter / Person ID	Submission Point ID	Original Submission Statement	Support or Oppose	Reasons
		<p>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.</p>		<p>management and navigation services. Managing, through mitigating and reducing the effects of dust within the vicinity to the Christchurch International Airport is vital for facilitating the safe operation of air navigation in and out of Christchurch effectively and efficiently.</p>
<p>Christchurch International Airport Limited (61504)</p>	<p>pCARP - 930</p>	<p>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</p>	<p>Support.</p>	<p>Airways has principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace. Airways' core business (air navigation services), comprises air traffic control, air traffic management and navigation services.</p> <p>Managing, through mitigating and reducing the effects of dust within the vicinity to the Christchurch International Airport is vital for facilitating the safe operation of air</p>

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Submitter / Person ID	Submission Point ID	Original Submission Statement	Support or Oppose	Reasons
		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 including emergency contact details.		navigation in and out of Christchurch effectively and efficiently.
Christchurch International Airport Limited (61504)	pCARP - 932	Amend Rule 7.31 to require the [Christchurch International] 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.	Support.	Airways has principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace. Airways' core business (air navigation services), comprises air traffic control, air traffic management and navigation services. Avoiding or mitigating smoke or thermal updrafts will be important for the safe landing and taking off of aircraft from Christchurch International Airport.
Canterbury District Health Board (62935)	pCARP - 543	Recommendation: Rule 7.29(1); be amended to require an independently auditable dust	Support.	Airways has principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace. Airways'

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		management plan to be implemented to demonstrate that adverse effects on human health and the environment are being effectively avoided, remedied or mitigated. This plan shall be supplied to CRC at the time of consent application and audited at the discretion of CRC.		<p>core business (air navigation services), comprises air traffic control, air traffic management and navigation services.</p> <p>Managing, through mitigating and reducing the effects of dust within the vicinity to the Christchurch International Airport is vital for facilitating the safe operation of air navigation in and out of Christchurch effectively and efficiently.</p>
Elliot Sinclair & Partners Ltd (63198)	pCARP - 1214	Amend Rule 7.29 to remove the word "subdivision"	Oppose.	To ensure that activities in the vicinity of Christchurch International Airport are not exempt from Rule 7.29, for the purposes of ensuring Airways operations of facilitating safe, effective and efficient navigation of aircraft is safeguarded and not compromised from exemptions to the rule.
Bathurst Resources Limited (63175)	pCARP - 2247	Either delete Rules 7.29 or amend Rule 7.30 to apply to industrial and trade premises and construction properties, as well as subdivision or development properties.	Oppose.	Opposes deleting Rules 29 or 30 to ensure that activities in the vicinity of Christchurch International Airport are not exempt from Rule 7.29, for the purposes of ensuring Airways operations of facilitating safe, effective and efficient navigation of aircraft is safeguarded and not compromised from exemptions to the rule.

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Submitter / Person ID	Submission Point ID	Original Submission Statement	Support or Oppose	Reasons
Bathurst Resources Limited (63175)	pCARP - 2247	<p>Delete Rule 7.30.</p> <p>Rule 7.30 reads: <i>The discharge beyond the boundary of the property of origin of dust from a subdivision or development property where less than 4ha of land is unsealed or unconsolidated at any one time is a permitted activity provided the following conditions are met:</i></p> <ol style="list-style-type: none"> <i>1. A dust management plan prepared in accordance with Schedule 2 must be held and implemented by the persons responsible for the discharge into air; and</i> <i>2. The dust management plan is supplied to the CRC on request.</i> 	Oppose.	To ensure that activities in the vicinity of Christchurch International Airport are not exempt from Rule 7.30, for the purposes of ensuring Airways operations of facilitating safe, effective and efficient navigation of aircraft is safeguarded and not compromised from exemptions to the rule.
Lyttelton Port Company Limited (63151)	pCARP - 777	Amend Rule 7.30 to permit the discharge of contaminants into air from unsealed or unconsolidated surfaces from an industrial or trade premise	Oppose.	To ensure that activities in the vicinity of Christchurch International Airport are not exempt from Rule 7.29, for the purposes of ensuring Airways operations of facilitating safe effective and efficient navigations of aircraft is safeguarded and not compromised from exemptions to the rule.

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Transpower (63159)	pCARP - 2845	<p>Rules 7.29 and 7.30 deal with discharges of dust beyond the boundary of the property of origin from an industrial or trade activity that is below the ‘offensive and objectionable’ threshold. Below this threshold, any odour or dust discharging industrial or trade activity that is not otherwise permitted is a restricted discretionary activity. High levels of dust can cause corrosion of Transpower’s lines and towers. Transpower therefore supports the new regime in the pCARP which deals with potential effects of dust below the offensive and objectionable threshold</p>	Support.	<p>Airways has principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace. Airways’ core business (air navigation services), comprises air traffic control, air traffic management and navigation services.</p> <p>Managing, through mitigating and reducing the effects of dust within the vicinity to the Christchurch International Airport is vital for facilitating the safe operation of air navigation in and out of Christchurch effectively and efficiently.</p>