

# Submission on applications for resource consent by Fulton Hogan

To: Environment Canterbury and Selwyn District Council

Name of Submitter: Air New Zealand Limited ("Air New Zealand")

- This is a submission on an application from Fulton Hogan Limited for various resource consents to establish an aggregate quarry known as Roydon Quarry ("Quarry") at a site within the Selwyn District bounded by Curraghs Road, Dawsons Road, Madisons Road and Jones Road, Canterbury, legally identified as: Rural Section 6475 and Rural Section 6324; Lot 1 Deposited Plan 4031; Rural Section 6342; Section 7 Survey Office Plan 510345, and Rural Section 5381 and Section 6 Survey Office Plan 510345.
- The proposed Quarry will involve topsoil stripping, bund formation and aggregate extraction to a depth of approximately ten metres below ground level. Other activities that are part of the proposal include stockpiling of aggregates, wash water ponds, as well as associated workshops, planting and staff areas.
- Air New Zealand is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
- 4 Air New Zealand opposes the application.

### Air New Zealand

- Air New Zealand is a commercial airline and is the flag carrier of New Zealand. The airline operates daily scheduled passenger flights into and out of Christchurch International Airport ("**Airport**").
- 6 Certainty and security of flight paths is essential to both approaching and departing aircraft. As such it is important to Air New Zealand that it's flight path operations are not disrupted by the proposed Quarry.
- 7 Air New Zealand has not been consulted on the proposal.

## Reasons for submission

- 8 Air New Zealand's submission relates to the entire proposal but in particular, its interests concern the following applications:
  - A CRC192408 land use consent to excavate material;
  - B CRC192410 discharge permit to discharge contaminants into air from an industrial or trade premise or process;
  - C CRC192411 discharge permit to discharge stormwater into land where contaminants may enter groundwater;
  - D CRC192414 Water permit to use water for aggregate washing and dust suppression, either as a change to the conditions of resource consent CRC182422 or a new water permit to use water;



- E Any other part of the resource consent application relating to the discharge of contaminants into air; and
- F Any other part of the resource consent application relating to wash water ponds.

## **Dust and Airborne Contaminants**

- 9 Air New Zealand is concerned with the impacts that airborne dust and contaminants will have on approaching and departing aircraft using the flight paths above the Quarry. The impacts will be felt during the day to day operation of the Quarry.
- The proposal makes it clear that operation of the Quarry will involve quarrying, crushing, screening and stockpiling of aggregate and heavy traffic movements transporting processed aggregate form the site. These activities are likely to produce airborne dust which may have a detrimental effect on visibility in the airspace above the quarry.
- The proposal seeks to mitigate and/or manage the effects of airborne dust by way of management plans. Air New Zealand notes that the dust management plan does not specifically address the effect that dust has on flight operations, nor propose any specific mitigation measures.

#### **Bird Strike**

- Air New Zealand is further concerned with the lack of conditions in relation to monitoring wildlife in the vicinity of wash water ponds and other bodies of water present on the site of the Quarry. In particular, it is concerned with the potential for 'bird strike' to occur with concentrations of birds flying between other water sources and these ponds in the vicinity of the flight path to the airport.
- Bird strike is a collision between an airborne animal and an aircraft. The risk of bird strike occurring is increased by factors such as bird concentrations as a result of storage of water on sites near to flight paths. Bird strike has the potential to case serious damage to aircraft and consequently impact the safety of passengers and crew.
- 14 Currently the proposal does not demonstrate what measures, if any, will be taken to reduce the risk of bird strike. Air New Zealand wishes to be consulted on any proposed mitigation/prevention measures that may be included as conditions of consent.

### **Decision sought**

963216.1

- In order to ensure the adverse effects of the proposed Quarry do not impact Air New Zealand's operations in the vicinity of Christchurch Airport, Air New Zealand seeks the following decision from the consent authority.
  - A That consent is not granted;
  - B In the alternative, if consent is granted, that it is subject to appropriate conditions and restrictions to address the consents set out above; and

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- C Such further other and/or consequential relief to (a) and (b) above address the matters raised in this submission.
- Air New Zealand wishes to be heard in support of its application.

Dated this 10th day of June 2019

Sarah Lloyd, Senior Legal/Counsel

Air New Zealand

Address for service:

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