Memorandum of Counsel on behalf of Christchurch International Airport Limited

Dated: 28 November 2019
May it please the Panel

1. We act for Christchurch International Airport Limited (CIAL).

2. CIAL lodged a submission on the resource consent applications lodged by Fulton Hogan Limited for the Roydon Quarry (the Application) on 16 April 2019. CIAL filed evidence from Mr Rhys Boswell in support of CIAL’s submission on 14 October 2019.

3. CIAL has reviewed the Applicant’s evidence, rebuttal evidence and the conditions offered with respect to RC185627 which were tabled at the hearing on 18 November 2019 by Mr Bligh.

4. CIAL is generally supportive of those conditions, and in particular the conditions relating to airport operations and bird strike (conditions 50 to 54 in the version of 18 November). CIAL considers those conditions satisfy all but one of the concerns raised in its submission and evidence. The remaining matter is whether a requirement for low seed producing grass to be used on the final land form should be specifically included in the conditions of consent (as discussed in Mr Boswell’s evidence). However CIAL does not consider that it needs to be heard on that point and seeks that the Panel determine that remaining issue on the papers.

5. CIAL no longer wishes to be heard and seeks leave to be excused from attendance at the hearing.

Date: 28 November 2019
Signature:

Jo Appléyard / Amy Hill
Solicitors for Christchurch International Airport Limited