

Before Independent Hearing Commissioners  
at Christchurch

CRC192408, CRC192409, CRC192410, CRC192411, CRC192412,  
CRC192413, CRC192414, and RC185627

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*under:* the Resource Management Act 1991

*in the matter of:* Application by Fulton Hogan Limited to establish a  
quarry

*by:* **Christchurch International Airport Limited**  
*Submitter*

## Memorandum of Counsel on behalf of Christchurch International Airport Limited

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Dated: 28 November 2019

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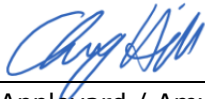


May it please the Panel

- 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:



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Jo Appleyard / Amy Hill  
Solicitors for Christchurch  
International Airport Limited