

PO Box 14001

Christchurch 8544

New Zealand

Telephone (+64 3) 358 5029

christchurchairport.co.nz

15 September 2025

Expert Panel

Ryan's Road Industrial Development Substantive Fast-Track Application

RE: **Christchurch International Airport Limited – Comments on Ryan's Road Industrial Development Substantive Fast-Track Application**

1. INTRODUCTION

Christchurch International Airport Limited ("**CIAL**") opposes Carter Group Limited's ("**the Applicant**") substantive Fast Track application, Ryans Road Industrial Development ("**the Application**" or "**the proposal**") at 104 Ryans Road and 20 Grays Road ("**the Site**"), due to the impacts of the proposal on Airport operations and the Application's inadequate consideration of potential risk to aviation safety.

The Application proposes to subdivide and develop approximately 55.5 hectares of rural land adjacent to Christchurch International Airport ("**Christchurch Airport**" or "**the Airport**") for industrial purposes. The Application would facilitate the delivery of 126 freehold lots for industrial development.

CIAL seeks to ensure that development does not compromise the safe and efficient operation of Christchurch Airport, its navigational assets, or its ability to operate unrestricted as critical regional and national infrastructure. CIAL considers that the Application would likely compromise the safe and efficient operation of Christchurch Airport as it has not satisfactorily addressed potential risks to aviation safety.

The Application has only partly addressed the relevant controls and restrictions under the Christchurch District Plan ("**CDP**") and has not satisfactorily addressed key civil aviation rules, restrictions and requirements relating to the operation of the Airport and its navigational and surveillance equipment. It is CIAL's view that the timing of the Application has not allowed for meaningful engagement with CIAL or other key aviation stakeholders. This has resulted in a proposal that constitutes a high risk to the operational and aviation safety of the Airport with the potential for significant adverse effects on the functioning of navigation and surveillance systems that operate at the Airport.

Accordingly, given the fundamental safety matters that have not been addressed by the Application, CIAL requests that the Expert Panel decline the Application.

Without prejudice to its primary relief, if the Expert Panel is minded to approve the Application, CIAL seeks that it only does so once the Application has sufficiently addressed the adverse effects on the Airport. This includes submitting a comprehensive aeronautical study of the proposal involving genuine consultation with key stakeholders, including CIAL, and making suitable amendments to the Application in light of this information.

CIAL also requests that, in the event of approval of the Application, enforceable conditions are imposed to ensure the long-term safety and unfettered operation of the Airport and its assets.

Should the Application sufficiently address the adverse effects on the Airport, CIAL has suggested amendments to the proposed conditions, as attached in **Appendix A** and summarized in section 5 of this submission, however these amendments are not exhaustive and CIAL reserves the right to comment on draft conditions further.

2. STRATEGIC IMPORTANCE OF CHRISTCHURCH INTERNATIONAL AIRPORT

Christchurch Airport is the largest Airport in the South Island and the second-largest in the country. It is regionally and nationally significant infrastructure and a Requiring Authority under section 167 of the Resource Management Act.

The Airport handles nearly 7 million passengers and over 100,000 aircraft movements annually, supporting a 24/7 international and domestic operation. It is the South Island's primary air freight hub and a base for international Antarctic science programmes. On that basis, the Airport is a significant physical and economic resource locally, regionally and nationally.

CIAL's core function is to be a safe and efficient Airport operator, providing appropriate facilities for Airport users, for the benefit of commercial and non-commercial aviation users and to pursue commercial opportunities from complementary products, services and business solutions.

Christchurch Airport has a significant point of difference to other Airports in New Zealand, Australia and many other parts of the world. It operates without curfew and is unrestricted as to the types of aircraft using it. This provides unique benefits to Christchurch Airport, and in turn the region, as the Airport can accommodate late arriving overseas flights and the international Antarctic science programme, as well as associated fleet maintenance activities. The ability of the Airport to continue to operate 24 hours a day, 365 days of the year without restriction is integral to the future economic and social well-being of people in the region, the South Island and nationally.

Ensuring aviation safety is maintained is paramount to the continued operations of Christchurch Airport and the status of the Airport as a local, regional and national asset of significance which is reflected in legislation and various statutory documents. Land use activities in the city affect, and may be affected by, Airport operations, and development near the Airport has the potential to compromise the safe and efficient operation of the Airport runways. Safety is paramount to all commercial airport operators and nearby land uses must be carefully managed to avoid undue safety risks to the Airport operations.

3. CHRISTCHURCH INTERNATIONAL AIRPORT AND ASSETS

Christchurch Airport is located at 30 Durey Road, Harewood, and CIAL owns the land directly north of the Site. The Airport includes two runways, which generally extend from north to south and from east to west. At its closest point, the Site is located 170 m from the southern end of the physical runway and 74 m from its emergency runway (**Figure 1**).

Christchurch Airport, its runways, buildings and much of the immediate surrounding land used for Airport support services, is zoned Specific Purpose (Airport) Zone, which includes an Aviation Precinct and a Development Precinct under the CDP (**Figure 2**). The Airport and surrounding land, including the land directly adjacent to the Site, is subject to a designation for '*Airport purposes*'. In addition, a portion of the Site and the land directly north of the Site is included within the Runway End Protection Areas ("**REPA**") (refer to Figure 3), which protects land and airspace at runways ends including by restricting development and activities on the land and associated airspace for the safe functioning of the Airport.



Figure 1: Proposed Ryans Road subdivision in relation to the Airport's southern runway.

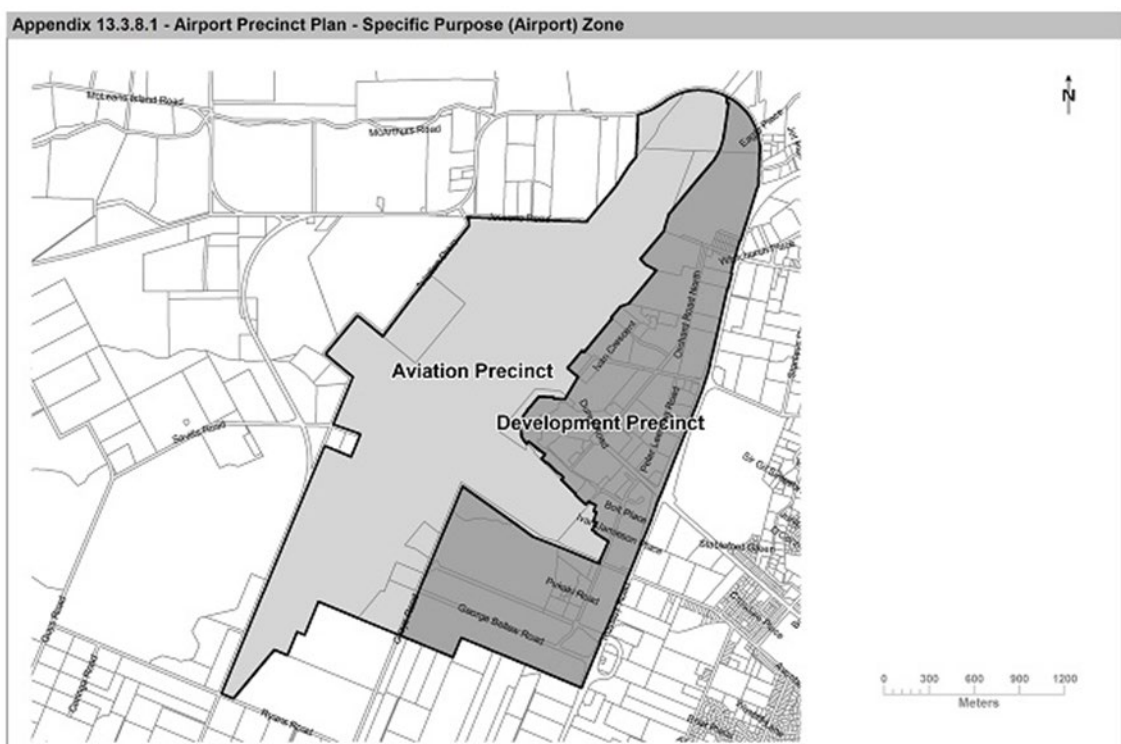


Figure 2: Special purpose (Airport) Zone Map.

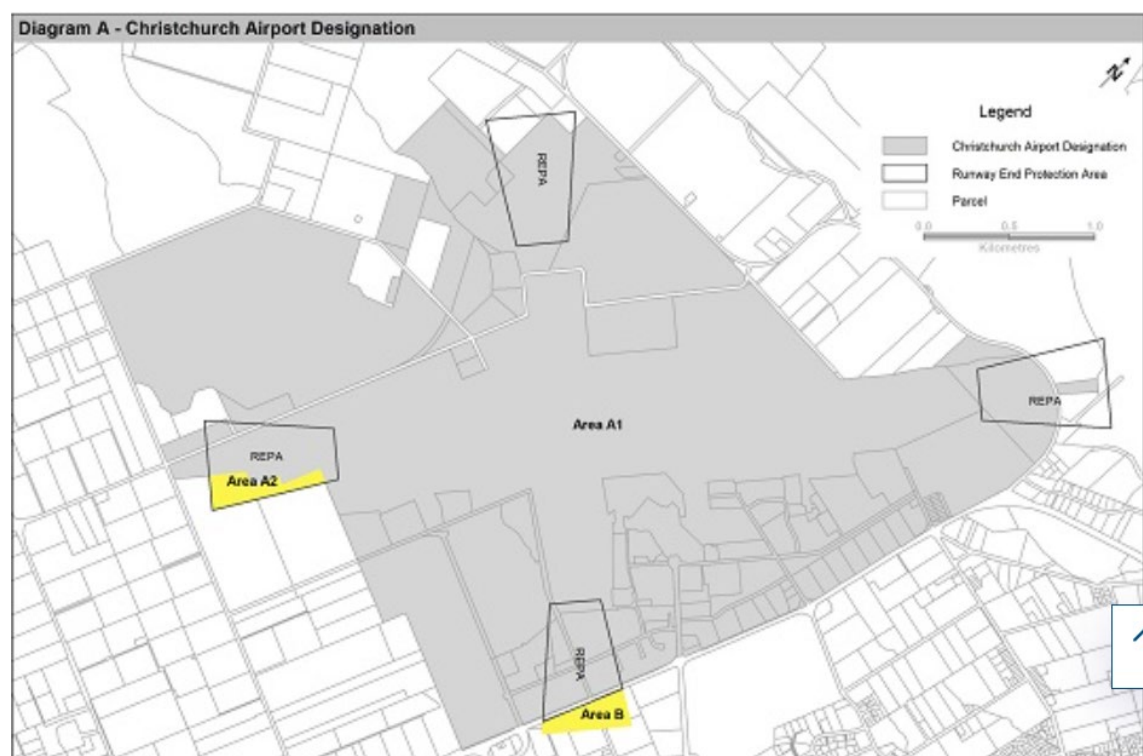


Figure 3: Airport Designation (A1) and Runway End Protection Area (A2) located over the Site.

The safe operation of Christchurch Airport is reliant on key aviation navigational aids that guide aircraft during takeoff and landings. These include:

- > CO2/20 approach lighting that extends across the Airport - designed to support the existing CAT 1 Instrument landing system;
- > Instrument Landing System (“**ILS**”) located approximately 75 m from the Site which guide aircraft onto the runway through RF beams that transmit a glidepath and localize to landing aircraft ; and
- > Doppler VHF Omni Directional Range (“**DVOR**”) located approximately 40 m from the Application Site which is used for aircraft approach and back-up navigation when GPS services are down.
- > Radar services (Primary Surveillance Radar and Secondary Surveillance Radar) which send out radar signals and receive returns from aircraft. These services allow the position of aircraft to be tracked to maintain safe separation limits and landing/takeoff. Radar services are highly sensitive and heavily impacted by all structures and features around it including buildings, vehicles and ground surfaces.

As the holder of the aerodrome operator certificate for Christchurch Airport, Part 139 of the Civil Aviation Rules 2023 require CIAL to protect the operation of any electronic or visual navigation aid or air traffic service facility for the aerodrome. These systems use a variety of technologies that are sensitive to changes in the surrounding environment and built form. The proximity of the Site to these systems and extent of built form proposed has the potential to render these systems inoperable and/or compromised. The Application has not submitted a formal aeronautical study assessing the potential effects on the navigational systems and therefore it is unknown what adverse effects the Application would have. The potential adverse effects are described in more detail in Section 4.1 of this submission.

3.1 CONSULTATION

CIAL wishes to express its concern that the timing of the Application has not allowed for genuine engagement with CIAL and other key aviation stakeholders on the potential impacts of the application on aviation safety.

The Application has the potential for material impacts on the nationally significant Airport operations and aviation safety through increased bird strike risk, lighting effects, physical development and impact to the operation of navigational systems. There are also a number of Civil Aviation Rules (“**CAR**”), standards and requirements that sit outside the CDP that the application has either not considered or not appropriately addressed.

CIAL considers the absence of genuine consultation has contributed to the number of significant concerns raised in this submission that now need to be considered and assessed by the Expert Panel, without the information necessary to understand these risks.

3.2 ADEQUACY OF SAFEGUARDING ASSESSMENT

The Applicant submitted a Safeguarding Assessment prepared by L+R Airport Consulting on 15th August 2025 as part of the amendments to the Application. CIAL considers the assessment has

failed to properly address all relevant New Zealand aviation regulatory requirements and in particular aerodrome safeguarding requirements, and fails to confirm that adverse effects on aviation safety from the proposed development will be avoided. The Safeguarding Assessment failed to undertake consultation with potentially impacted stakeholders, which is a key component of any comprehensive aviation safeguarding assessment. The Safeguarding Assessment is also not a full aeronautical study of the proposal and therefore is not sufficient to assess the aviation effects of the proposal.

In New Zealand the aviation regulatory system includes a set of CAR providing the overarching regulatory structure for the management of aviation safety. Each CAR covers a particular area but interacts with other requirements. The CARs are developed and issued by the Minister of Transport under the Civil Aviation Act. The Director of Civil Aviation delegates powers to Civil Aviation Authority staff to issue certificates and licences in accordance with the CARs, monitor adherence and investigate occurrences and incidents. The Director also publishes CAA Advisory Circulars (ACs) that contain information about standards, practices, and procedures that they have found to be an acceptable means of compliance with the associated CAR.

Section 4 of the Safeguarding Assessment does not accurately identify the relevant New Zealand Airport safeguarding regulations and guidelines. It is missing assessment against CAR Part 77 which relates to Objects and Activities Affecting Navigable Airspace. This rule provides requirements to ensure aircraft safety is not compromised by any visual or structural obstacle, that could pose a hazard in navigable airspace. Hazards covered by Part 77 include lights, lasers, weapons, colours, markers, flags or pyrotechnics. It is also missing assessment against CAR Part 100 which relates to specific requirements for safety management systems.

CIAL also considers that the Safeguarding Assessment has not sufficiently addressed the actual or potential adverse effects of the Application on the Airport and its operations, given the large number of issues identified under section 4 of this submission.

CIAL therefore considers the submitted Safeguarding Assessment is inadequate and fails to provide a comprehensive or complete assessment of the proposal with respect to relevant aviation regulations and the actual and potential adverse effects on aviation safety of the proposal. The Application has therefore failed to provide information in sufficient detail in accordance with section 43 of the Fast-track Approvals Act 2024.

4. KEY EFFECTS AND OPERATIONAL RISKS TO AIRPORT OPERATIONS

4.1 NAVIGATION AND SURVEILLANCE SYSTEMS

CIAL considers that the Application is incomplete as there is insufficient information to assess the effects of the proposal on the aeronautical navigational and surveillance systems operating at the Airport.

The Safeguarding Assessment appended to the Application by the Applicant on 15th August 2025 is not a full aeronautical study of the proposal and therefore is not sufficient to assess the aviation effects of the proposal. This is regardless of CIAL's position that the Safeguarding Assessment is inadequate for the reasons outlined in section 3.2 of this submission. As such, CIAL request that the Application is declined as there is a high risk of significant adverse effects

on the aeronautical navigational and surveillance systems of the Airport that the Application has not addressed or provided sufficient information for full assessment.

If the Expert Panel is minded to approve the Application, CIAL requests that the Applicant must submit, prior to any approval, an independent aeronautical study prepared by a suitably qualified and experienced professional that assess the potential risks to the Airport and associated aviation activities, including but not limited to the effects on the navigational and surveillance systems by the proposed industrial development. The assessment should be undertaken in accordance with all CAA guidelines and best practice aviation guidelines, including relevant guidance prepared by the International Civil Aviation Organization (“ICAO”).

The assessment should:

- Model the full scale of permitted development being proposed (maximum building heights, maximum building coverages, industrial building materials, etc.) to determine the effects of the proposal on the operation of the navigational and surveillance systems;
- Be undertaken in consultation with potentially impacted stakeholders, as is standard practice; and
- Not be limited to an assessment on the navigation aids that are there at present, as the navigation aids may change in future depending on the Airport’s operational needs. It is important that the futureproofing of these critical assets is safeguarded.

Suitable amendments must be made to the Application in light of this assessment to address identified adverse effects.

CIAL considers this is a reasonable request given the scope of permitted industrial development being sought by the Applicant, the close proximity to the Airport, and the significant adverse consequences for public safety should the navigational and surveillance systems be compromised.

CIAL has identified specific further relief, if the Expert Panel is minded to approve the Application, in the following sections. However, due to the failure of the Application to provide sufficient information to assess the extent of adverse effects on the navigational and surveillance systems, CIAL in the first instance requests the application be refused. CIAL reserves the right to alter its position further upon siting any amendments to the Application.

4.1.1 DVOR

Guidelines relating to the operation of the DVOR set out key setbacks that ensure the safe and effective operation of the navigational system from obstructions (Figures 4 and 5). To ensure the safe and effective operation of the DVOR, these guidelines seek that:

- > There are no obstructions that impede a 2.5 degree vertical angle from the DVOR;
- > The 0 - 150 m radius from the DVOR is clear of obstructions and level;
- > Only trees, powerlines and fences less than 10m in height are located within a 150 m - 200 m radius of the DVOR;

- > Non-metallic structures are less than 12.2 m in height, and metallic structures less than 3.5m in height located within a 200 m – 300 m radius of the DVOR; and
- > Any structure is allowed 300+ m from the DVOR provided the structure's height does not exceed the 2.5 degree vertical angle.

The Applicant has proposed Land Use Condition 5B to protect the 'Airport protection surfaces' of the DVOR. Land Use Condition 5B would prohibit any building, structure, vegetation or utility (or part thereof) from penetrating the DVOR 'protection surface'. In doing so, the Applicant suggests that *"the risk of conflict with the DVOR remains the same as the existing situation"*.

CIAL disagrees that this is a suitable approach, nor that the risk of conflict is the same. The operation of the DVOR is directly impacted by the density of built form in the surrounding area. To this end, the DVOR siting criteria guidelines are clear that where higher density clusters of buildings or development are proposed both within and further away than 300m from the DVOR, further Site specific analysis should be undertaken to ascertain potential effects on the DVOR. The ICAO EUR Doc 015 European Guidance Material on Managing Building Restricted Areas provides further guidance on managing development around the DVOR. Crucially, this analysis has not been undertaken, meaning the potential impact of the development on the DVOR is unknown.

It is misleading to suggest that future industrial development, which would be enabled by the suggested conditions, would result in the same risk that would be brought about by the permitted baseline for the Site. While farm buildings, low fencing, and other structures that are not defined as buildings could be erected on the Site currently, this form of rural development would expectedly be of a very low density. By contrast, in removing the RUF zoning maximum site coverage standard of 10% net site area the Application would enable industrial development of the lots with significantly taller buildings and significantly greater site coverage. Moreover, there is no proposed limitation on building materials despite enabling a significant increase in density. The net result is the enabling of a larger, more intense development of the Site, with industrial buildings and heavier materials that pose a far greater risk to the operation of the DVOR than the existing permitted baseline.

The failure to provide an aeronautical study by the Application means the adverse effects on the DVOR cannot be assessed. Therefore, CIAL requests that the Application be declined.

If the Expert Panel is minded to approve the Application, CIAL requests that the Applicant must submit, prior to any approval, an independent aeronautical study prepared by a suitably qualified and experienced professional that assess the potential risks to the Airport and associated aviation activities. Suitable amendments must be made to the Application in light of this assessment to address identified adverse effects.

In addition to the fundamental information gaps identified above, CIAL has further specific concerns with proposed Lots 58-60. Lots 58-60 are located within 300m of the DVOR; the nearest boundaries of proposed Lots 60 and 59 are located approximately 40 m and 160 m respectively from the DVOR, while Lot 58 is located within 200 – 300 m. As such, any development on these lots may impinge upon the specific DVOR siting criteria, posing a potentially significant and unacceptable risk to the safe and effective operation of the DVOR. The Applicant proposes Land Use Condition 5B to restrict building heights on these lots to comply with the siting criteria,

however no land use conditions are proposed to restrict the density/building coverage on these lots or the materials of construction, raising the potential for adverse effects on the operation of the DVOR system.

To mitigate the risk to the effective operation of the DVOR and aviation safety of the runway, CIAL opposes any development on Lots 59 and 60 and seeks that development located on Lot 58 is limited by way of consent condition to 12 m in height for non-metallic constructed structures and 3.5 m in height for metallic constructed structures. Without appropriate restrictions preventing development on Lots 58-60, there is a significant risk to the continued safe and effective operation of the DVOR and, in turn, unacceptable risks to aircraft utilising the southern runway of the Airport.

CIAL reserves the right to seek further changes be made to the Application further upon siting the requested aeronautical study and any other amendments to the Application.

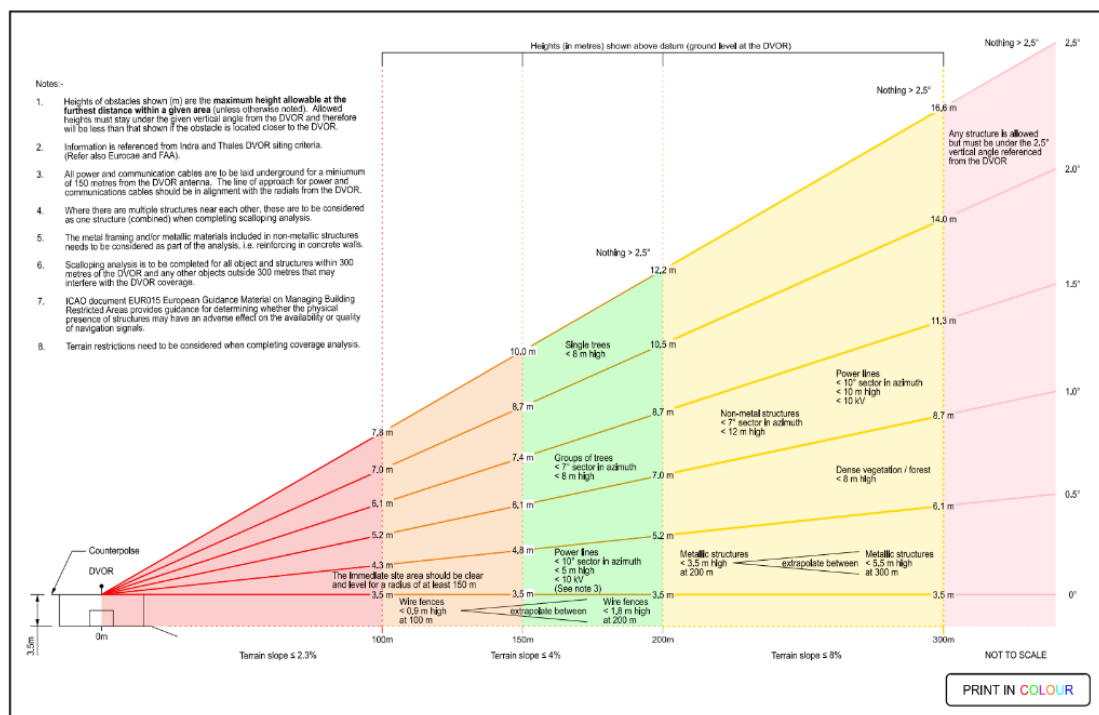


Figure 4. DVOR designation Site and siting criteria.

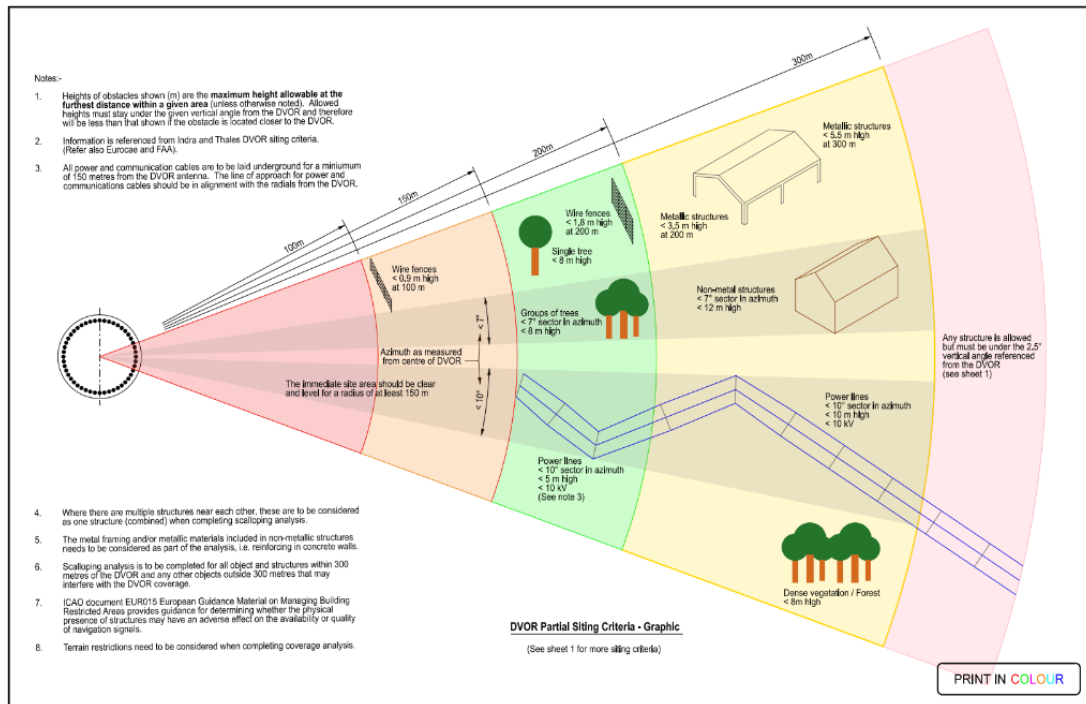


Figure 5. DVOR designation Site and siting criteria graphic

4.1.2 Instrument Landing System (ILS)

The Application recognises that a portion of the ILS extends onto a 100m² area of proposed Lot 126 that is located outside of the REPA, while it should also be noted that the ILS extends onto an additional 4,900m² of Lot 126 covered by the REPA.

CIAL is concerned over the potential effect of construction activities on the Site impacting the operation of the ILS. Regardless of the mapped location of the REPA, construction of buildings within the ILS zone would potentially affect the safe operation of the system. The failure to provide an aeronautical study by the Application means the adverse effects on the ILS cannot be assessed. Therefore, CIAL requests that the Application be declined.

If the Expert Panel is minded to approve the Application, CIAL requests that the Application must submit, prior to any approval, an independent aeronautical study prepared by a suitably qualified and experienced professional that assess the potential risks to the Airport and associated aviation activities. Suitable amendments must be made to the Application in light of this assessment to address identified adverse effects. CIAL reserves the right to alter its position on the Application further upon siting the requested aeronautical study and any other amendments to the Application.

4.1.3 CO2 / 20 Approach Lighting

In the event of approval of the Application, CIAL requests the relief detailed in section 4.6 Lighting of this submission are adopted to ensure no effect on the safe operation of the CO2 / 20 Approach Lighting system.

4.1.4 Radar

The radar services operating at the Airport (Primary Surveillance Radar and Secondary Surveillance Radar) are highly complex and sensitive navigation and communication systems that send and receive radar signals that bounce off surfaces in the area and sky. ICAO guidance for the radar systems recommends a Building Restricted Area (which new buildings should avoid intruding into) of a 15km cone with a 0.25-degree angle originating from the centre of the radar system. The Application would enable industrial development within the Building Restricted Area. The sensitivity of the radar systems means their operation would be affected by radar interference from the proposed industrial development.

The failure to provide an aeronautical study by the Application means the adverse effects on the Radar systems cannot be assessed. Without this information, CIAL requests that the Application be declined.

If the Expert Panel is minded to approve the Application, CIAL requests that the Application must submit, prior to any approval, an independent aeronautical study prepared by a suitably qualified and experienced professional that assess the potential risks to the Airport and associated aviation activities. Suitable amendments must be made to the Application in light of this assessment to address identified adverse effects. CIAL reserves the right to alter its position on the Application further upon siting the requested aeronautical study and any other amendments to the Application.

4.1.5 Visibility

The Safeguarding Assessment fails to identify the potential for dust during construction restricting pilot vision to both the runway and the nearby Garden City Helicopters heliport, and possibly air traffic control view of the aircraft on approach. The report also does not state how construction objects or debris would be managed to ensure that this does not impact flight safety during windy days or for aircraft on approach, including helicopters which fly directly over the Site.

Before any decision on the Application can be reached the Safeguarding Assessment needs to be updated to address how construction dust, objects and debris would be managed during construction to prevent any effect on the operation of the Airport with appropriate conditions of consent added or amended as necessary.

4.2 BIRD STRIKE RISK

The Bird Strike Management Area (“**BMA**”) for the Airport applies within a defined radius (within 3 km of the thresholds of the runways). Any development that has the potential to increase the number of birds within the Bird Strike Management Area presents a significant risk to the safe operation of the Airport. Bird strike is a collision between a plane and a bird or flock of birds and can cause significant damage to aircraft engines or airframes leading to serious aviation incidents. CIAL has commissioned Avisure to review the Application (refer **Appendix B**) to assess the potential risk of bird strike during both the construction and operational phases of the proposed development. This report states:

‘The proposed industrial development occupies two parcels of land, measuring 33.67 hectares and 24 hectares, respectively, located immediately within and adjacent to the undershoot of Runway 20. This location is significant from a bird strike perspective because even short local flights of birds attracted to the Site could enter aircraft flight paths, increasing the likelihood of collisions. Additionally, the Site lies directly beneath a frequently used helicopter flight path, where helicopters operate at low altitudes, further elevating the potential for bird strikes. This bird hazard poses a risk during both the construction and operational phases of the development.’

Avisure also identifies that there is limited detail on the provisions of the Wildlife Hazard Management Plan (“**WHMP**”) the Applicant proposes is prepared under suggested Land Use Condition 17. CIAL is concerned that the proposed WHMP provisions are insufficient to manage the risk of bird strike during construction and on an ongoing basis.

CIAL does not consider proposed Land Use Condition 17, which requires provision of a WHMP for the Site, is sufficient in detail to ensure the increased risk of bird strike is adequately mitigated for the reasons discussed below.

4.2.1 Stormwater basins

The two proposed stormwater basins (both with maximum water surface areas of 999m²) would be located 514m apart and have been designed to drain within 48 hours of the cessation of a 2% AEP storm.

Chapter 6.7 Aircraft Protection of the CDP seeks to provide for the protection of aircraft so they can safely and efficiently approach, land, take-off and depart from Airports, airfields or helipads. The BMA specifically seeks to achieve this by managing activities with the potential to attract birds to avoid or mitigate the potential for increased risk of bird strike on aircraft in the area. Large stormwater basins have the potential to attract waterfowl and other birdlife that would increase the risk of bird strike hence standard 6.7.4.3.1 of the CDP restricts the provision of larger stormwater basins.

As part of the amendments to the Application submitted by the Applicant on 15 August 2025, the design of the proposed stormwater basins has been modified to achieve technical compliance with standard 6.7.4.3.1 of the CDP. While the design of these basins now complies with CDP requirements, the large size of the proposed stormwater basins and their proximity to one another still have the potential to attract waterfowl when wet, and other bird species when dry (as a favorable nesting spot). Due to the close proximity of the basins to the Airport runway, CIAL therefore considers their construction will increase the scale and significance of bird strike risk in the BMA thereby posing a risk to the safe operation of the Airport.

To reduce any risk of bird strike, stormwater basins are not used at Christchurch Airport. Instead, all stormwater is treated and discharged directly to ground via soak pits. Given the critical location of the Site directly adjacent to the final approach and departure pathway of the Airport’s main runway, CIAL seeks that all stormwater at the Site be treated and discharged direct to ground, rather than via stormwater basins.

4.2.2 Landscaping

As above, CIAL requests in the first instance that stormwater basins are removed from the application and all stormwater at the Site is instead discharged directly to ground via soak pits. However, for completeness CIAL provides the following commentary with regard to the proposed landscaping (both of the stormwater basins and the wider Site).

Plant species within newly created stormwater basins are required under Rule 6.7.4.3.1 of the CDP to be limited to those plant species listed under Appendix 6.11.9 of the CDP. Control of planting species within the stormwater management areas is important to limit the attractiveness of the basins to birdlife.

While the Applicant has submitted a concept landscaping plan, the plan is insufficient in detail and does not clearly depict the extent, quantity and species of planting. The Applicant has not submitted a detailed landscape plan for approval and there are no proposed conditions requiring the future detailed landscape plan to be specifically in accordance with Appendix 6.11.9 of the CDP. Avisure has reviewed the concept landscaping plan and identified a lack of robust justification for the species selection for street and buffer planting, noting several of the proposed species may be attractive as a food source or roost for birdlife.

To minimise the risk of bird strike, CIAL requests that the Expert Panel requires a detailed landscape plan for the stormwater basins, street planting and buffer planting to be submitted before any decision on the Application can be reached. The detailed landscape plan should clearly identify the species, quantity and extent of proposed planting on the Site. It should also justify species selection and how it minimises attractiveness to birdlife where any species (regardless of their location across the Site) are not in accordance with Appendix 6.11.9 of the CDP. An independent ecologist who is familiar with New Zealand plant and bird species should be engaged to review the plant species selected for landscaping, with a view to minimising the attraction of birds to the Site.

4.2.3 Construction and Earthworks Management Plans

Activities relating to construction and earthworks have the potential to attract varying birdlife. CIAL notes none of the following activities appear to have been considered by the submitted Construction Management Plan or Earthworks Management Plan:

- > Waterfowl may be attracted by trenching and excavation works that fill with water, and by sediment retention ponds.
- > Soil stockpiles may provide food resources for opportunistic bird species.
- > Grassing/seeding can be a highly attractive food source to a range of bird species depending on the species of seed.

The submitted management plans fail to consider the risk of these activities potentially attracting birdlife to the area and subsequent increased risk of bird strike to Airport operations.

In the amended proposed set of conditions submitted by the Applicant on 15th August 2025, the Applicant states the wording of Subdivision Conditions 23, 26, 27 & 28 relating to provision of an Environmental Management Plan will be updated to 'provide greater specificity regarding

construction activities and the management of any risks to airfield operations, both during the initial bulk earthworks stage and when the lots themselves are developed'. CIAL acknowledges this update from the Applicant, however as no amended versions of the conditions were submitted, CIAL reserves its position on the conditions until amended versions have been sighted.

Regardless, CIAL requests that the Expert Panel requires the submitted Construction Management Plan and Earthworks Management Plan be updated to adequately identify the potential for construction and earthworks activities to attract birdlife and management measures that will be put in place to minimise this risk before any decision on the Application is made.

4.2.4 Wildlife Hazard Management Plan

To manage the potential risk of bird strike, the Applicant has proposed Subdivision condition 100 and Land Use Condition 17 that requires a WHMP be developed prior to subdivision development and prior to future industrial development of the Site respectively.

CIAL accepts that the preparation and implementation of a well-prepared WHMP can form part of a suitable strategy to manage the potential bird strike risks. However, it is a management measure only, and cannot be used to address fundamental design risks, such as those set out above, that may attract birds in the first place.

CIAL considers the currently proposed wording of Land Use Condition 17 and Subdivision Condition 100, and level of detail required of the WHMPs is insufficient to satisfactorily manage the risk of bird strike from the proposed development.

In the amended proposed set of conditions submitted by the Applicant on 15th August 2025, the Applicant states the wording of Subdivision Condition 100 and Land Use Condition 17 will be updated to 'provide greater specificity regarding monitoring and enforcing the plan, managing activities that may increase the risk of birdstrike and initial vs. ongoing management requirements'. CIAL acknowledges this update from the applicant, however as no amended version of the conditions was submitted, CIAL reserves its position on the conditions until an amended version has been sighted.

If the Expert panel is minded to approve the Application, CIAL requests, at a minimum, that Subdivision Condition 100 and Land Use Condition 17 are amended to address the following matters:

- > It is inappropriate for the proposed consent conditions to exclude a mechanism for certification of the WHMPs by CCC. Without such a control in place, there is a risk that unsuitable or ineffective management measures could be implemented which would fail to appropriately avoid or minimise adverse bird strike risks. The conditions should be amended to include a certification mechanism.
- > The stormwater system and basins will take up to 48 hours to drain in a 2% AEP event and therefore have the potential to attract waterfowl, increasing the risk of bird strike. Given the proximity of the basins to the Airport runway, the proposed consent conditions should specifically identify how the WHMPs will address the management of the stormwater

system, should waterfowl or other birdlife be observed using these areas, to minimise the increased risk of bird strike.

- > The stormwater basins, when dry, would be attractive for roosting to multiple bird species that have a risk of bird strike. Given this elevated risk, the proposed consent conditions should specifically identify how the WHMPs will address the management of the stormwater basins, should birdlife be observed using these areas, to minimise the increased risk of bird strike.
- > Construction activities (such as sediment retention ponds, trenching, excavation and stockpiling) have the potential to attract birdlife increasing the risk of bird strike. This has not been considered in the Construction Management Plan submitted with the Application, and the proposed consent conditions fails to identify how the WHMPs will address the bird-related risks that may arise during construction activities.
- > The proposed consent conditions fails to identify how the WHMPs will address the potential for bird attraction to flat-roofed buildings nor remedial measures should this occur.

The conditions, as currently written, also fails to require sufficient information on standard operational process of the WHMP. If the Expert Panel is minded to allow the Application, CIAL requests that the conditions also be amended to require the WHMPs to provide detail of:

- a. The monitoring process including:
 - i. Defining acceptable bird numbers and detailing observation frequency.
 - ii. Identifying who will conduct the monitoring, including what qualifications and experience are necessary for the monitor.
 - iii. Detailing how data will be captured and what reporting methods will be utilised.
- b. Active management actions that will be available in the event of excessive bird numbers and what triggers that will prompt their implementation.
- c. Remedial actions if risks are identified.
- d. Reporting and communicating findings and actions to stakeholders.
- e. Review frequency of the WHMP.
- f. Consultation with relevant stakeholders throughout the development process, including CIAL.

In the amended proposed set of conditions submitted by the Applicant on 15th August 2025, the applicant proposes the deletion of previously proposed Land Use Condition 12 on the basis that the condition has been incorporated into newly proposed Land Use Condition 5. Land Use Condition 12 would require all development and construction to comply with section 6.7.4.3 Birdstrike Management Areas of the CDP. CIAL opposes this deletion as Land Use Condition 5 only controls the height of development and does not relate to other matters controlled under section 6.7 Aircraft Protection of the CDP.

CIAL considers it appropriate to retain Land Use Condition 12 to manage the risk of birdstrike however, section 6.7.4.3 of the CDP encompasses permitted, restricted discretionary, and prohibited activity rules. This generalised wording does not sufficiently protect the runway take-off and landing airspace. CIAL seeks that any use, development or subdivision within the Birdstrike Management Area must comply with the permitted activities rule 6.7.4.3.1 of the CDP. To this effect, CIAL requests that Land Use Condition 12 be retained and amended to require compliance with the permitted activities rule. See detail of requested amendment under **Appendix A: Condition Table.**

Notwithstanding the above and without prejudice to its position in opposition to the Application, CIAL supports the proposed development restrictions outlined in Land Use Condition 3(b.), which limit the development and use by yard-based landscape or garden suppliers, and heavy industrial activities such as fish processing, packing plants, abattoirs, and freezing works, due to their potential to attract birds.

4.3 HELICOPTER FLIGHT PATHS

Garden City Helicopters ('**GCH**') operates from the Airport, directly adjacent to the Site. GCH's Final Approach and Take-Off Area ("**FATO**") is located partly over the Site (Figure 6). Construction of buildings under the FATO is generally recommended to be avoided as the FATO comprises an emergency landing area in the case of an emergency landing. CAA Advisory Circular 139-8 states that:

Operational safety

- > *4.1.3 A major safety consideration of a heliport is the availability of suitable approach and take-off climb surfaces. Heliports should have approach and take-off paths such that, if the helicopter is not a performance Class 1 helicopter, an autorotative landing can be conducted without any undue risk to any person on the ground.*
- > *4.1.4 The approach and take-off flight paths should be over terrain which affords emergency landing areas in relation to the proposed altitude of the helicopter and its autorotative performance. Ideally the approach and take-off surfaces should be over water, or land, free of third parties and with a minimum of obstructions. Approach and take-off flight paths over residential or industrial areas, playgrounds, occupied car parks, or any other populated area should be avoided."*

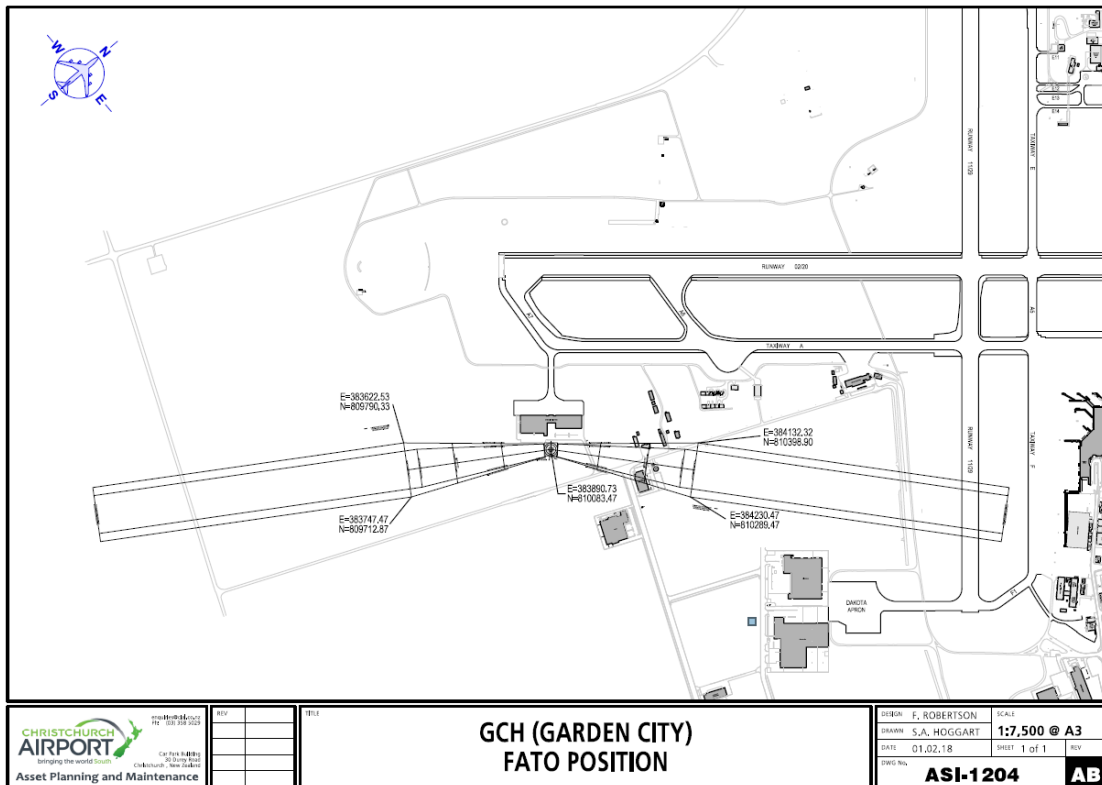


Figure 6: Garden City Helicopters FATO

Establishment of the proposed industrial development directly under the FATO for GCH will potentially affect the safe operation of helicopter movements from the Airport and compliance with CAR.

As discussed further in section 4.4 Protection Surfaces of this submission, the Applicant proposes Land Use Conditions 5B & 5H to protect the FATO for GCH. Land Use Condition 5B would prohibit any building, structure, vegetation or utility (or part thereof) from penetrating the FATO protection surface. Land Use Condition 5H would prevent any construction equipment from penetrating the FATO protection surface. Without prejudice to its position in opposition to the Application, CIAL is supportive of the proposed conditions insofar as they relate to requiring all development and construction to avoid penetration of the FATO. However, if the Expert Panel is minded to allow the Application, CIAL requests that the wording of both conditions is amended. See detail of requested amendment under **Appendix A: Condition Table**.

With regard to rotor downwash, the submitted Safeguarding Assessment identifies downwash can have a detrimental impact at a distance up to 3 rotor diameters from the helicopters. CIAL generally agrees that downwash from helicopters passing over the Site would not be expected to be of concern however the helicopter flight path over proposed Lot 121 has a height restriction of between 20 and 40 m. It is therefore possible that a slow moving helicopter on approach or departure to or from the FATO could be at a height of less than 30 m above the ground and therefore there would be rotor downwash in that area. CIAL requests that the submitted Safeguarding Assessment is updated to address the risk of downwash over Lot 121 prior to any decision on the Application.

Notwithstanding the above, the Application fails to protect the emergency landing areas along the FATO thereby compromising the aviation safety of the helicopter operations. Enabling the construction of industrial development underneath the FATO will create a high density of obstructions on the ground which would encroach into the safe autorotative landing areas. This is at odds with CAA Advisory Circular 139-8 and creates undue risk to the helicopter operations as well as future occupiers of the industrial development.

The submitted Airport Safeguarding Assessment prepared by L+R Airport Consulting states that there are practical limitations on complying with the CAA Advisory Circular 139-8 within an urban environment. CIAL considers this to be misleading as the Site is not located within an urban environment; it is in a rural environment. The current Rural Urban Fringe zoning provides for a significantly lower density of development than the Application seeks to provide for. Therefore, the risk of conflict with helicopter operations and emergency landings by current or future rural development of the Site is significantly lower than the risk that would arise by the proposed industrial development, and the claimed practical limitations that would arise with compliance in an urban environment therefore are not present on the rural Site. To address the risk to and from helicopter operations CIAL requests that development within the FATO is prohibited to protect the emergency landing areas underneath the FATO.

However, if the Expert Panel is minded to approve the Application, CIAL requests that the Application must submit, prior to any approval, an independent aeronautical study prepared by a suitably qualified and experienced professional that assess the potential risks to the FATO and helicopter activities at the Airport. The study must comprehensively address all relevant aeronautical regulations and statutory requirements. Suitable amendments must be made to the Application in light of this assessment to address identified adverse effects. CIAL reserves the right to alter its position on the Application further upon siting the requested aeronautical study and any other amendments to the Application.

4.4 PROTECTION SURFACES

The airspace above the entire Site is part of defined protection surfaces under the CDP. The CDP sets out rules with the objective of preserving the unobstructed airspace within these areas for the safe manoeuvring of aircraft at low altitude during take-off and landing (Figures 7 and 8). To this effect, the protection surfaces rule restricts any building, structure, tree or utility that penetrates the Protection Surfaces other than provided for by Rule 6.7.4.1.3 of the CDP and except for navigational aids and maintenance or repair of existing building, structures or utilities.

CIAL notes that the Safeguarding Assessment submitted by the Applicant fails to consider the proposed changes to obstacle limitation surfaces (OLS) by the International Civil Aviation Organization that will become international standards for aerodromes in 2030. The proposed new OLS requirements are more strict than current requirements around the sides and approach areas for a runway. New Zealand is a signatory to the Convention on International Civil Aviation and is expected to amend the CAR to incorporate the new international standards post-2030. Given the incoming standards represent best practice and it is possible development on the Site would occur post 2030, CIAL considers an assessment against the incoming standards would be appropriate in the interests of best maintaining aviation safety. CIAL requests that, prior to any decision, the Applicant procures an independent aeronautical study prepared by a suitably

qualified and experienced professional that assesses the proposal against the incoming ICAO OLS requirements to confirm there will be no adverse effects on the safe operation of the Airport.

In the amended set of proposed conditions submitted by the Applicant on 15th August 2025, the Applicant has proposed Land Use Condition 5B that would prohibit any building, structure, vegetation or utility (or part thereof) from penetrating the protection surfaces as detailed on the submitted plans. CIAL is supportive of the general intent of this condition however opposes the wording of the exemption '*except as specified on RC-PG123*'. RC-PG123 is a copy of the DVOR Designation Site and Siting Criteria Table. The DVOR table contains two protective elements;

- > A height protection surface of 2.5-degrees originating from the DVOR; and
- > A separation distance requirement prohibiting any structures within 300m except for specified structures. Notably, none of these structures are permitted to exceed the 2.5-degree height protection surface.

Therefore, there are no 'exemptions' permitted by the criteria table with regards to penetrating the DVOR height protection surface and therefore the current wording of Land Use Condition 5B is ineffectual and misleading in that it infers there are 'exemptions' permitted. To this effect, CIAL requests that Land Use Condition 5B be amended for clarity. See detail of requested amendment under **Appendix A: Condition Table**. CIAL has addressed the separation distance requirements of the DVOR guidelines in section 4.1.1 of this submission.

In the amended set of proposed conditions submitted by the Applicant on 15th August 2025, the Applicant proposes the deletion of previously proposed Land Use Condition 12 on the basis that the condition has been incorporated into newly proposed Land Use Condition 5. CIAL opposes this deletion as Land Use Condition 5 only controls the height of development and does not relate to other matters controlled under section 6.7 Aircraft Protection of the CDP. CIAL considers it appropriate to retain Land Use Condition 12 with amendments. Land Use Condition 12 states future development must comply with section 6.7.4.1 of the CDP however section 6.7.4.1 encompasses permitted, restricted discretionary, and prohibited activity rules. This generalised wording does not sufficiently protect the runway take-off and landing airspace. CIAL requests that any use, development or subdivision within the protection surfaces area must comply with the permitted activities rule 6.7.4.1.1 of the CDP. To this effect, CIAL requests that Land Use Condition 12 be amended. See detail of requested amendment under **Appendix A: Condition Table**.

In the amended set of proposed conditions submitted by the Applicant on 15th August 2025, the Applicant has proposed Land Use Condition 5H to address the potential for temporary cranes, masts and other construction plant to penetrate the protection surfaces. CIAL is concerned about the potential effect of construction activities on the Site penetrating the Protection Surfaces. Industrial development of the Site would likely require scaffolding and craneage during construction activities that could potentially penetrate the Protection Surfaces even if the buildings being constructed were compliant with the height limitations. CIAL notes the wording of Land Use Condition 5H is inconsistent with similar proposed conditions and therefore requests amendments for clarity. See detail of requested amendment under **Appendix A: Condition Table**.

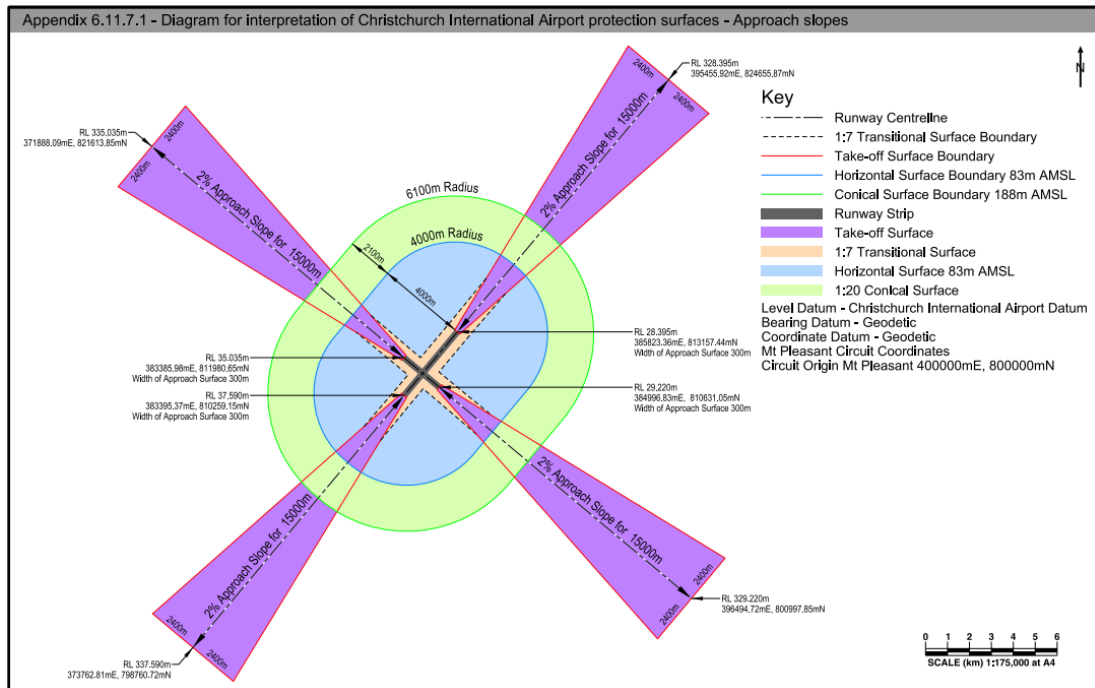


Figure 7: Protection surfaces approach slope.

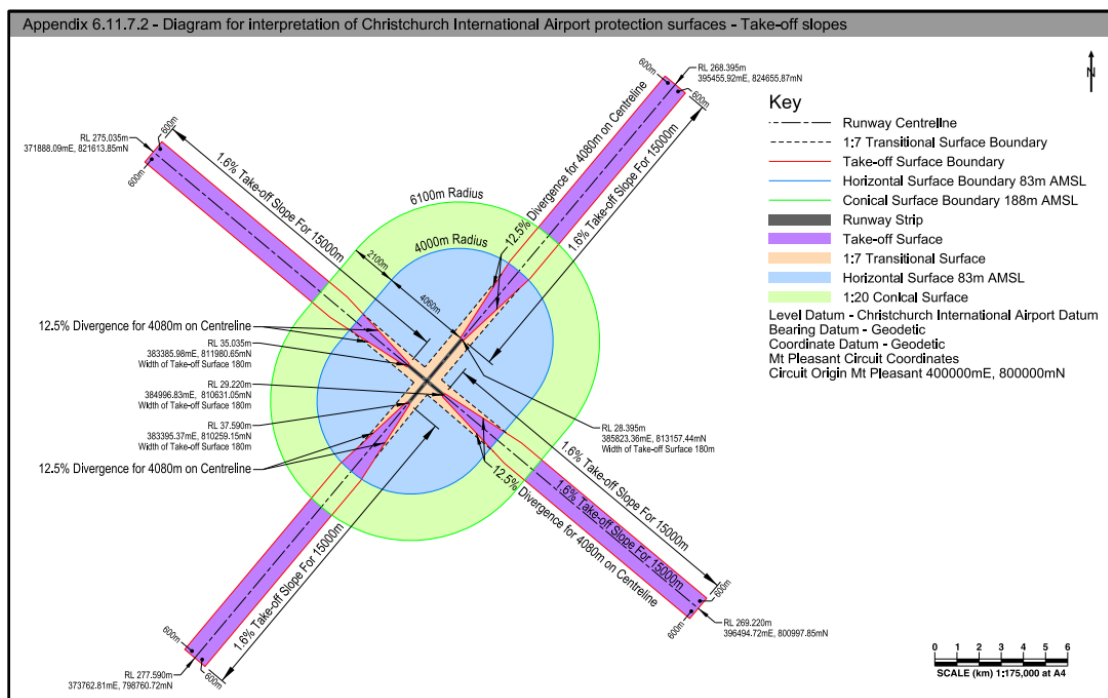


Figure 8: Protection surfaces take-off slope.

4.5 RUNWAY END PROTECTION AREA

Designation (D1 Christchurch International Airport) restricts the land and associated airspace within the Runway End Protection Area (“**REPA**”) for the purpose of the safe and efficient functioning of the Airport. Section 6.7.4 Rules – Christchurch International Airport of the CDP also prohibits several activities within the REPA. For expedience, as Designation D1 restricts a

more extensive list of activities, this section of this submission covers the restrictions under the designation. Section 4.2 Lighting of this submission addresses the restriction of light beams & reflective glare under Section 6.7.4 of the CDP not covered by the designation.

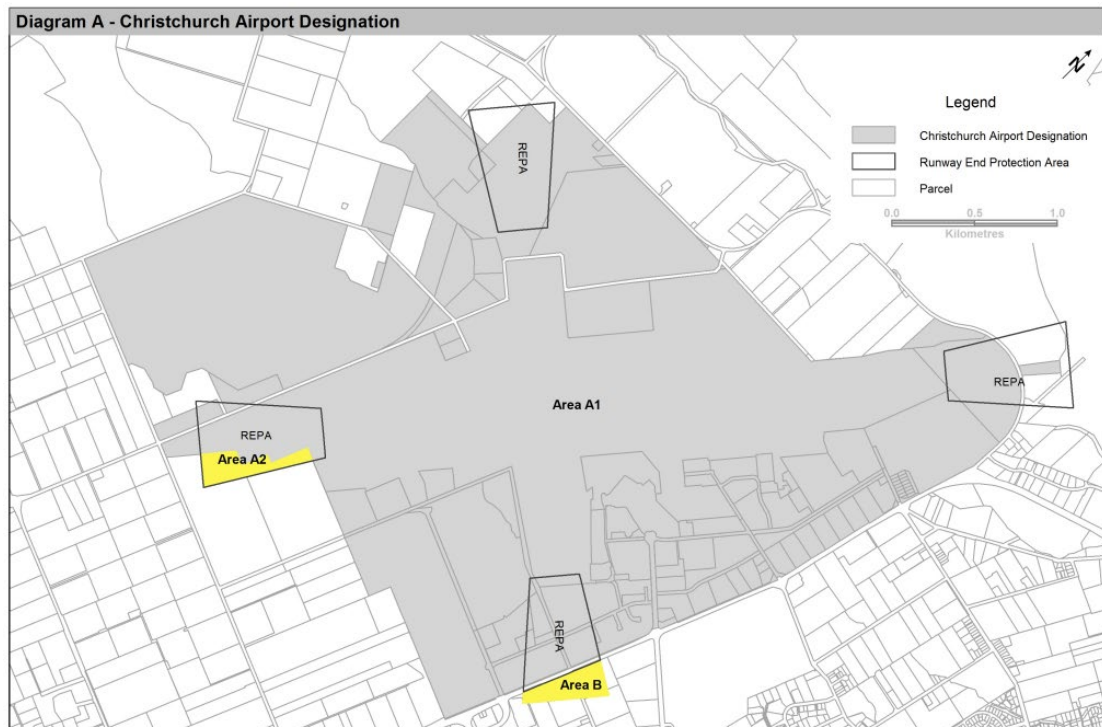


Figure 9: Extent of Designation D1 Christchurch International Airport

Designation D1 prohibits any new building or utility within the REPA excluding:

- > *Structures associated with upgrades for State Highway 1;*
- > *Maintenance or repair works on any building or utility;*
- > *Enclosed walkways associated with vehicle parking areas which are no greater than 2.4 metres in height and 1.8 metres in width;*

Under the CDP, buildings include the following:

- > *any structure or part of a structure, whether permanent, moveable or immovable; and/or*
- > *any erection, reconstruction, placement, alteration or demolition of any structure or part of any structure within, on, under or over the land; and*
- > *any vehicle, trailer, tent, marquee, shipping container, caravan or boat, whether fixed or moveable, used on-Site as a residential unit or place of business or storage.*

The designation also restricts any new activity within the REPA that generates or is likely to generate the following effects:

- i. *Mass assembly of people (golf course recreation does not amount to mass assembly of people);*

- ii. *Release of any substance which would impair visibility or otherwise interfere with the operation of aircraft including the creation of smoke, dust and steam;*
- iii. *The use or storage of hazardous substances exceeding the quantities permitted within the underlying zone;*
- iv. *Production of direct light beams or reflective glare which could interfere with the vision of a pilot, excluding reflections or lights from motor vehicles;*
- v. *Production of radio or electrical interference which could affect aircraft communications or navigational equipment; and*
- vi. *Attraction of birds, including but not limited to crops, orchards, and waterbodies (including swales or retention basins for the management of storm water).*

Figure 10: REPA (blue striped) within Designation D1 located over the Site.

Although the designation remains in place regardless of this proposal's outcome, its requirements should be clearly and explicitly incorporated into any consent conditions should the Expert Panel be minded to approve the Application. Without enforceable provisions, developers and tenants may unintentionally plan development that could cut across REPA restrictions, potentially compromising the safe and efficient operation of aircraft.

CIAL acknowledges that the Applicant has proposed Land Use Condition 3(b.) to prevent service stations, yard-based landscape/garden suppliers, and heavy industrial uses across all proposed industrial lots (activities that exceed (i)-(vi)). While CIAL supports this condition Site-wide, many other industrial activities may also result in the effects specifically referred to in (i)-(vi) above. Therefore, CIAL requests that Land Use Condition 3 is amended to prohibit any activities on land subject to the REPA designation that have the potential to generate the effects listed in (i)-(vi). See detail of requested amendment under **Appendix A: Condition Table**.

In the amended set of proposed conditions submitted by the Applicant on 15th August 2025, the Applicant proposes the deletion of previously proposed Land Use Condition 12 on the basis that the condition has been incorporated into newly proposed Land Use Condition 5. CIAL opposes this deletion as Land Use Condition 5 only controls the height of development and does not relate to other matters controlled under section 6.7 Aircraft Protection of the CDP.

CIAL considers it appropriate to retain Condition 12, however is concerned that the proposed drafting refers to compliance with section 6.7.4.2 of the CDP which encompasses permitted and prohibited activity rules. This generalised wording does not sufficiently protect the REPA. CIAL requires that any use, development or subdivision within the REPA must comply with the permitted activities Rule 6.7.4.2.1 of the CDP, and not the other rules in Section 6.7.4.2 of the CDP. To this effect, CIAL requests that Condition 12 is retained and the wording amended accordingly. See detail of requested amendment under **Appendix A: Condition Table**.

4.6 LIGHTING

The Application recognises the crucial nature of complying with CDP and the Civil Aviation Authority lighting rules to ensure the safety of aircraft operations and avoid potentially significant adverse effects. It is essential for the safety of aircraft landing and take-off that Airport specific lighting rules are adhered to within 500 m of the runway and the light control areas as set out in Figure 11.

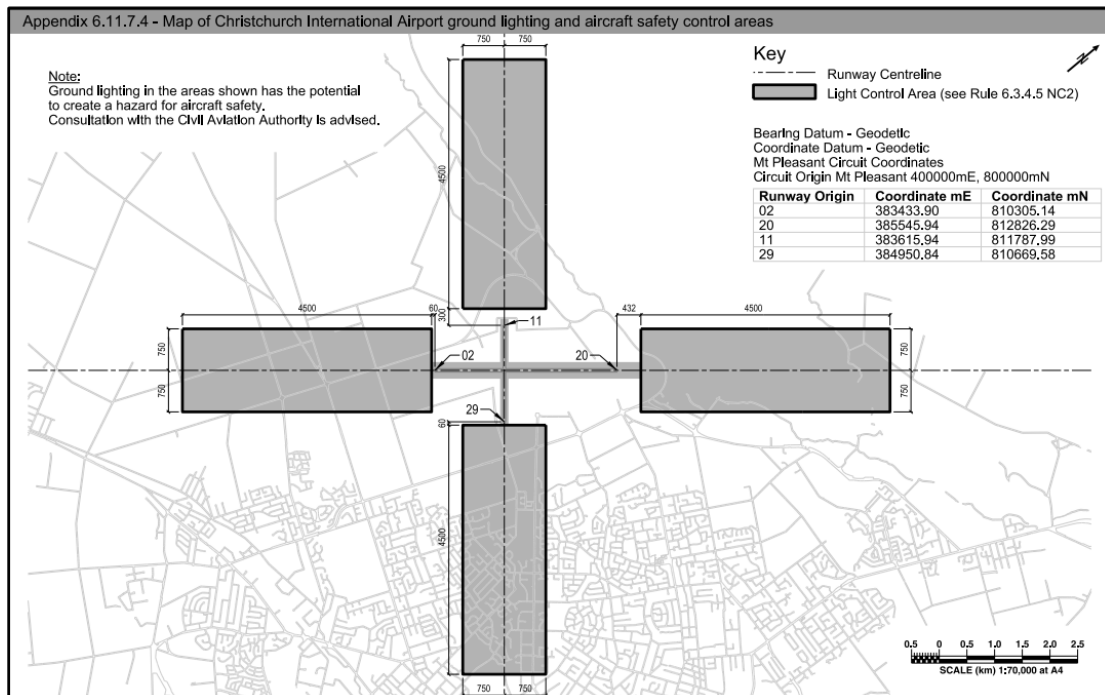


Figure 11: Christchurch Airport ground lighting safety control areas.

The Applicant is proposing that Industrial General lighting standards of the CDP will apply to the future development of the Site. In addition, the Applicant has proposed Land Use Condition 9 (a.), requiring all future development and construction to comply with Airport specific lighting rules under section 6.3.4 Control of Glare of the CDP. This current wording incorporates permitted activity, restricted discretionary activity and non-complying activity rules.

In the amended set of proposed conditions submitted by the Applicant on 15th August 2025, the Applicant states the wording of Land Use Condition 9 will be updated to explicitly impose the relevant permitted activity standards in the District Plan. CIAL acknowledges this update from the Applicant, however as no amended version of the condition was submitted, CIAL still requests the wording of Land Use Condition 9(a.) be amended to require compliance with permitted activity Rule 6.3.4.1 of the CDP to avoid any potential effects from glare on the Airport. See detail of requested amendment under **Appendix A: Condition Table**.

Land Use Condition 9 (b.) also requires preparation of a Site-specific lighting plan and assessment for Lots 7-126 at time of building consent. It is inappropriate for the condition to exclude a mechanism for certification of the submitted reporting by Christchurch City Council ("**CCC**"). Without such a control in place, there is a risk that incorrect reporting and/or unsuitable or ineffective management measures could be implemented which would fail to appropriately avoid or minimise the risk of glare affecting the safety of Airport operations. CIAL requests that this condition be amended to require prior certification by the CCC. See detail of requested amendment under **Appendix A: Condition Table**.

It is noted that the Applicant also proposes Land Use Condition 10 (a.), which is intended to require that future development and construction must comply with lighting spill rules in section 6.3.5 of the CDP. This current wording incorporates both permitted activity and restricted discretionary activity rules.

In the amended set of proposed conditions submitted by the Applicant on 15th August 2025, the Applicant states the wording of Land Use Condition 10(a.) will be updated to explicitly impose the relevant permitted activity standards in the CDP. CIAL acknowledges this update from the Applicant, however as no amended version of the condition was submitted and to avoid any potential effects from light spill on the Airport, CIAL requests that Land Use Condition 10 (a.) requires future development and construction to comply with permitted activity lighting spill rule 6.3.5.1 of the CDP. See detail of requested amendment under **Appendix A: Condition Table**.

The Applicant also proposes Land Use Condition 11 to control the lighting within 500m of the runway threshold. In the amended set of proposed conditions submitted by the Applicant on 15th August 2025, the Applicant states the wording of Land Use Condition 11 will be updated to explicitly impose the relevant permitted activity standards in the CDP. CIAL acknowledges this update from the applicant, however as no amended version of the condition was submitted, CIAL reserves its support for the condition until an amended version has been sighted.

Further, the current wording fails to specify that the condition should apply to future development and construction of future proposed lots which is of significant concern to CIAL as it could potentially result in adverse lighting effects.

The submitted lighting report identifies example mitigation measures for 'Phase 2' of the development to manage the lighting effects of the development, including specific measures for lighting within 500m of the runway threshold. The Application has included some but not all of these identified mitigation measures within Land Use Condition 11. To avoid any potential effects from lighting on the sensitive 500m runway threshold, CIAL requests that Land Use Condition 11 be amended to include all specific mitigation measures identified by the lighting report for development within 500m of the runway threshold. See detail of requested amendment under **Appendix A: Condition Table**.

The Application proposes Subdivision condition '85 Construction Stage Lighting' to prevent any construction during the hours of darkness that would require artificial lighting. To avoid any potential effects from construction lighting related to future industrial development on the Airport, CIAL requests that a similar Land Use Condition 'Construction Lighting' should be included in the Application. See detail of requested condition under **Appendix A: Condition Table**.

Without prejudice to its position in opposition to the Application, CIAL is supportive of the proposed conditions insofar as they relate to requiring all development and construction to comply with the permitted Airport specific lighting rules.

4.7 BUILDING GENERATED WINDSHEAR AND TURBULENCE (BGWT)

The Applicant proposes Land Use Conditions 5F and 5G to manage the risk of BGWT. Land Use Condition 5F would prohibit any building, structure, vegetation or utility from penetrating the BGWT trigger plane unless certified under Land Use Condition 5G. Land Use Condition 5G would require any development that would penetrate the BGWT trigger plane to provide certification by a SQEP that the building would not exceed accepted criteria in 'National Airports Safeguarding Framework (NASF) Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports'.

CIAL is supportive of this approach, however, requests that the wording of Land Use Condition 5F is amended for clarity and consistency. See detail of requested amendment under **Appendix A: Condition Table**.

Further, it is inappropriate for proposed Land Use Condition 5G to exclude a mechanism for certification of the submitted reporting by the CCC. Without such a control in place, there is a risk that incorrect reporting and/or unsuitable or ineffective management measures could be implemented which would fail to appropriately avoid or minimise the risk of BGWT affecting the safety of Airport operations. If the Expert Panel is minded to grant the Application, CIAL requests that the condition be amended. See detail of requested amendment under **Appendix A: Condition Table**.

4.8 REVERSE SENSITIVITY

Reverse sensitivity effects remain a key concern for CIAL of any development of land adjacent to the Airport. CIAL notes that the Application has attempted to address reverse sensitivity matters and includes conditions to mitigate the potential risks associated with reverse sensitivity from future development. In this regard, CIAL supports proposed Land Use Conditions 3(a.) and 3(b.), which limit development to only those Industrial General Zone permitted activities set out in rule 16.4.1.1 of the CDP and do not authorise residential activities or residential units (including for management or security purposes), nor education activities. CIAL requests that the Expert Panel imposes Land Use Conditions 3(a.) and 3(b.) if it is minded to grant the Application.

5. SUMMARY OF REQUESTED CHANGES TO MITIGATE EFFECTS ON CIAL

CIAL requests that the Expert Panel decline the Application for the reasons outlined in section 4 of this submission above.

Without prejudice to its primary relief, if the Expert Panel is minded to approve the Application, it should only do so once the Application has sufficiently addressed the adverse effects on the Airport including by submitting a full comprehensive aeronautical study of the proposal, including as to matters raised within this submission, undertaking genuine consultation with CIAL and other aviation stakeholders and making suitable amendments to the Application as necessary.

CIAL also requests that, in the event of approval of the Application, enforceable conditions are imposed to ensure the long-term safety and unfettered operation of the Airport and its assets.

Should the Application sufficiently address the adverse effects on the Airport, CIAL has suggested amendments to the proposed conditions, as attached in **Appendix A**, however these amendments are not exhaustive and CIAL reserves the right to comment on draft conditions further:

DVOR Obstructions

- > Prior to any decision on the Application, an independent aeronautical study is prepared by a SQEP that assesses the potential risks to the DVOR system and amendments are made to the Application accordingly to suitably address identified adverse effects. The assessment should be undertaken in accordance with CAA guidelines and best practice

aviation guidelines. The assessment should model the full scale of permitted development being proposed (maximum building heights, maximum building coverages, industrial building materials) to determine the effects of the proposal on the operation of the DVOR.

- > In addition and without prejudice to the above:
 - Prohibit development on Lots 59 and 60, unless confirmed safe by Airways;
 - Maintain 12 m height limit on Lot 58 for non-metallic structures and restrict the use of metallic framing unless less than 3.5 m in height, or confirmed safe by Airways;

ILS Obstructions

- > Prior to any decision on the Application, prepare an independent aeronautical study to assess the potential risks to the ILS system by the proposed development, and amend the Application accordingly to suitably address identified adverse effects.

Radar

- > Prior to any decision on the Application, prepare an independent aeronautical study to assess the potential risks to the radar system by the proposed development, and amend the Application accordingly to suitably address identified adverse effects.

Visibility

- > Update the submitted Safeguarding Assessment, with proposed conditions of consent amended or added as necessary, to address the risk of dust and construction debris impacting visibility.

Bird Hazard Management

- > Amend Subdivision Conditions 99 and 100, and Land Use Condition 17 to:
 - require the WHMPs to be certified by the CCC;
 - ensure that the developer of the land and landowners must consult with CIAL prior to construction;
 - provide additional details on specific mitigation measures that the WHMP will include to manage the bird strike risk from the large stormwater basins, general construction activities and potential construction of a large number of flat-roofed buildings;
 - provide additional details on the operational processes of the WHMP including standard monitoring details, active and remedial management actions, details of reporting and communicating with stakeholders, and review frequency of the WHMP.
- > Amend Land Use Condition 12 to require development and construction to comply with Bird strike Management Area permitted activity rule 6.7.4.3.1 of the CDP.

- > Require the Applicant to submit a detailed landscape plan in accordance with Appendix 6.11.9 of the CDP, and reviewed by an independent ecologist who is familiar with New Zealand plant and bird species with a view to minimising the attraction of birds to the Site, for approval as part of the Application.
- > Require the Applicant to prepare an updated Construction and Earthworks Management Plans that address the relevant activities with the potential for attracting birds and increasing the risk of bird strike to the Airport.

Helicopter Flight Paths

- > The submitted Safeguarding Assessment be updated to address the risk of downwash over Lot 121.
- > Development under the FATO is prohibited to protect emergency landing areas along the FATO.
- > Prior to any decision on the Application, prepare an independent aeronautical study to assess the potential risks to helicopter operations by the proposed development, and amend the Application accordingly to suitably address identified adverse effects.

Protection Surfaces

- > Prior to approval of the Application, submit an independent aeronautical study prepared by a suitably qualified and experienced professional that assesses the proposal against the incoming ICAO OLS requirements to confirm there will be no adverse effects on the safe operation of the Airport, and amend the Application accordingly to suitably address identified adverse effects.
- > Amend Land Use Condition 5B to remove the protection surface penetration exemption.
- > Reinstate and amend Land Use Condition 12 to require future development and all construction related activities and structures to comply with Protection Surfaces permitted activity rule 6.7.4.1.1 of the CDP.
- > Include an additional Land Use Condition requiring all future building construction activities to prepare and submit a Height Construction Management Plan to CCC for approval to ensure construction activities do not breach the Protection Surfaces around the Airport.
- > Amend proposed Land Use Condition 5H for improved clarity on the restrictions to the height of temporary cranes, masts and other construction plant.

REPA Restrictions

- > Require full REPA restrictions to be set out as consent conditions, including prohibiting buildings, structures, and uses and activities that would generate specified effects within the REPA unless approved by CIAL.
- > Amend Land Use Condition 12 to specify compliance with the permitted activity rules under Rule 6.7.4.2.1 of the CDP.

Building Generated Windshear and Turbulence (BGWT)

- > Amend proposed Land Use Condition 5G for improved clarity.
- > Amend proposed Land Use Condition 5F to include a certification mechanism.

Lighting

- > Amend Land Use Condition 9 to require development and construction to comply with Control of Glare permitted activity rule 6.3.4.1 of the CDP and to require the prepared lighting report to be submitted to the CCC for certification.
- > Amend Land Use Condition 10 to require development and construction to comply with Control of Light Spill permitted activity Rule 6.3.5.1 of the CDP.
- > Amend Land Use Condition 11 to be applicable to all future development and construction activities within 500m of the threshold of the Airport runway, and add additional restrictions as recommended by the Applicant lighting report.
- > Include an additional Land Use Condition to prevent future development on the lots that would require external artificial lighting during the hours of darkness.

Reverse Sensitivity

- > CIAL requests that the Expert Panel imposes proposed Land Use Conditions 3(a.) and 3(b.) if it is minded to grant consent.

6. CONCLUSION

Christchurch Airport is a critical nationally significant infrastructure, and its safe and efficient operation is essential to the prosperity and growth of the Canterbury region and of New Zealand. While CIAL acknowledges the need for industrial growth in the City, the proposed Ryan's Road Industrial Subdivision under its current configuration and proposed conditions poses significant and unacceptable operational and safety risks to the Airport.

Accordingly, CIAL opposes the Application in its current form and requests that the Expert Panel decline the Application.