

SUMMARY STATEMENT – WEEK 10 (AIRPORT NOISE) – SARAH OLIVER

1. Tēnā koutou katoa, ko **Sarah Oliver** tōku ingoa. I am the City Planning Team Leader within the **Christchurch City Council** (the **Council**). I last appeared before the IHP on 16 April 2024 in relation to coastal hazards and city infrastructure qualifying matters (**QMs**). My appearance today relates to the airport noise QM.
2. The Council documents relevant to this summary statement are:
 - (a) Part 1 – Qualifying Matters s32 report¹, specifically Table 6 (page 39) summarising the number of impacted properties,
 - (b) Part 2 – Qualifying Matters s32 report² specifically section 6.20;
 - (c) Part 2 – – Qualifying Matters s32 report supporting technical reports contained in appendices 10 to 19;
 - (d) My s42A report specifically sections 12.7 to 12.70; and
 - (e) My rebuttal evidence sections 14 to 30.

Overview of Airport Noise QM

3. I consider the proposed Airport Noise QM to be an existing matter under sections 771(e) and 770(e) with the airport being nationally significant infrastructure, albeit applying a new spatial extent to the overlay. The first component of this QM relates to the protection of the Christchurch International Airport as directed by the CRPS, Chapter 6, Policy 6.3.5. This policy is to avoid noise sensitive activities establishing within the 50dBA Ldn airport noise contour unless the activity is within an existing residentially zoned urban area. In paragraphs 12.10 to 12.11 of my s42A report I explain what constitutes an “existing residential zoned urban area”, why additional enablement under the MDRS and NPS-UD Policy 3 is not provided for within the existing operative residential zones, and therefore why additional enablement is not ‘existing’ and should not be exempt from the Policy 6.3.5 avoidance direction.
4. The second component of this QM is the management of people’s exposure to levels of aircraft noise generated at or near the airports’ ultimate capacity, which might be disturbing resulting in adverse amenity and health outcomes.
5. Both components require consideration as to what is most appropriate in terms of enabling a greater residential density and resident population, to reside within the QM

¹ [Plan-Change-14-HBC-NOTIFICATION-Section-32-Qualifying-Matters-Part-1.pdf \(ccc.govt.nz\)](#)

² [Plan-Change-14-HBC-NOTIFICATION-Section-32-Qualifying-Matters-Part-2.pdf \(ccc.govt.nz\)](#)

impacted area, and the most appropriate methods to manage effects (zoning and rules).

6. As notified the Airport Noise QM was based upon the 2021 Annual Average 50dBA Ldn noise contour (overall annual average runway usage). Within the QM impacted area the operative residential zoning and rules were retained, specifically rules 14.4.1.3 RD34 and 14.12.1.3 RD26 that deem residential activities which do not meet the permitted or controlled activity density standards, a restricted discretionary activity³ with limited notification to CIAL. Subdivision as a controlled activity with minimum net site area, and residential activity is a non-complying activity within commercial zones impacted by the noise contour.
7. The CIAL submission requested the QM spatial extent to be based on the Updated 50dBA Ldn Outer Envelope noise contour (composite of four worst-case contours, with each representing the highest runway usage on each runway over a 3-month period) and the operative provisions to apply within this extended area. Following my identification and consideration of various options including those raised by submitters, I have recommended in my section 42A report that the QM should be based on the Updated (2023) 50dBA Ldn Outer Envelope noise contour (**Updated OE**), except for an area north of Riccarton Road which I recommend is rezoned for high density (HRZ).
8. I recommend the restricted discretionary rules do not apply to residential areas within the differential area between the operative contour and the updated outer envelope to avoid impacting on pre-existing development rights. The effect of the QM is only to retain the operative zoning and limit MDRS. I also recommend changes to the restricted discretionary rules to only apply to breaches of site density, site coverage and building heights, being the key determinants of dwelling and consequently resident density.
9. Within my rebuttal evidence I recommend as an alternative approach, a “Provisional Airport Noise Qualifying Matter”, based on the Updated OE, however my preferred position in regard to the area north of Riccarton Road as HRZ still stands. This approach would retain the Operative District Plan zoning for the impacted area, until after the CRPS review process has been completed (notification expected in December 2024). A subsequent plan change will be required to give effect to any changes to the CRPS airport noise policy and any related provisions.

³ Christchurch District Plan Chapter 14, Rule 14.4.1.3 RD34 (RS and RSDT zones) and 14.12.1.3 RD26 (RNN zone)

Key s42A and rebuttal points

10. I have summarised the relative benefits, costs and risks (depending on the option) within paragraphs 12.25 and 12.32 of my s42A report. I have identified within paragraphs 12.19 to 12.20 (pages 83 to 88) of my s42A report, excerpts from the Independent Expert Panel⁴ and Christchurch Airport⁵ reports that have informed my recommendations on this QM.
11. I highlight the following aspects:
 - i. the updated modelling (annual average and outer envelope) is based on the ultimate runway capacity, and the full extent of airport noise is not currently being experienced;
 - ii. use of the crosswind runway increases in summer months when north-westerly winds are more frequent, with these winds projected to increase due to climate change;
 - iii. the summertime is the period residents are most likely to regularly wish to open windows and utilise outdoor areas.
12. Page 96 paragraph 12.54 of my s42A report considers the number of potential future residents that might become highly annoyed by the airport's operations at or near to its ultimate capacity. These numbers are not insignificant and provide in my view additional validation to the CIAL concerns regarding reverse sensitivity effects.
13. Engineered solutions are possible and buildings can be designed to meet minimum ventilation rates and acceptable levels for noise affected habitable spaces which, if implemented, could narrow the issue to acceptable levels of outdoor amenity and access to fresh air. Whilst many residents may be willing to trade-off outdoor amenity, a reasonable level and quality is still important to health and well-being.
14. The impact of applying the Outer Envelope compared to the Annual Average contour (being close in spatial extent to the operative 50dBA contour), is significant in terms of the number of properties (a difference of some 5,000 feasible dwellings⁶) that would not benefit from greater development rights. However, it is important to recognise the significant enablement across the city even with the 50dBA Ldn OE as a QM, with areas outside the QM being as, if not more, appropriate for greater intensification. For

⁴ Christchurch Airport Remodelled Contour – Independent Expert Panel Report, Prepared for Canterbury Regional Council, June 2023

⁵ 2023 Updated Christchurch International Airport Noise Contours, Prepared by Christchurch Airport (Airbiz, Airways, Marshall Day Acoustics, Chapman Tripp)

⁶ IHP Question Response – Table 6, noting feasible dwellings as modelled for up to 6-storey but excluding apartments – refer to evidence of Mr Scallan [52-John-Scallan-Statement-of-evidence-final.PDF \(ihp.govt.nz\)](#)

example, upzoning Upper Riccarton to higher density is likely to be more feasible and attractive given its proximity to the University of Canterbury and number of lower density larger sites. The Mixed-Use Zone along Mandeville Street also presents an opportunity to transition to high density, as it is outside of the noise contour with large site sizes to facilitate higher density developments. In comparison, the area south of Riccarton Road west of Riccarton Mall (also impacted by the OE contour) is more complex and less feasible for redevelopment as already contains extensive townhouse development.

15. However, some level of trade-off or rather acceptance for a reduce level of amenity is necessary in relation to the land north of Riccarton Mall, which I recommend be rezoned for high density. At paragraphs 12.56 to 12.62 of my s42A report I discuss residential yields needed to support further public transport investment in this corridor (mass rapid transit) calculating that the CCC Amended Proposal zoning enablement could yield some 6480hh, well exceeding the desired 3,300hh to support the “Scenario 3 MRT indicative yields”. Given this is more than sufficient, there is no major strategic level need to increase densities in other residential locations within the QM.
16. I acknowledge that Waka Kotahi has withdrawn their submission in relation to the Airport Noise Contour with clarification sought by the panel regarding the remaining submission points also being withdrawn or otherwise. The partial or full withdrawal does not change my recommendation, as the importance of the City Spine corridor is well documented⁷, including within the recently adopted Greater Christchurch Spatial Plan.

Response to IHP information request #57

17. The panel in its information request #57 asked the Council to consider whether there are any areas within the airport noise influence area that might warrant a different management approach, due to the suitability of the area otherwise for intensification.
18. My answer is yes and specifically this is evident in my recommendation for the land north of Riccarton Road to be zoned HRZ to facilitate greatest population densities within a walkable catchment of a Town Centre and major public transport route (and potential mass rapid transit stops).
19. My response regarding other locations such as around Avonhead Mall, is dependent on whether greater precedence is given to housing enablement over protection of the airport's long-term operations. But as I have concluded as part of my strategic

⁷ S42A Report Sarah Oliver paragraph 12.109 and Part 2 of the s32 evaluation, section 6.31.

overview, what constitutes a well-functioning urban environment is not just housing supply. As important is the economic growth of the city and the airport, being a nationally significant asset, is a key contributor to the city's and region's economic future. It is my view that both the protection of the airport's long-term operations and maintaining a competitive housing market (with adequate housing choice) can be achieved without upzoning the entirety of the Outer Envelope QM impacted area. That there are many alternative locations outside of the QM impacted area which are well supported by infrastructure such to support higher density development.