

**BEFORE A PANEL OF INDEPENDENT HEARING COMMISSIONERS
AT CHRISTCHURCH**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHEKE
KI ŌTAUTAHI**

**IN THE MATTER
AND
IN THE MATTER**

of the Resource Management Act 1991

**of the hearing of submissions and further
submissions on Plan Change 14 to the
Operative Christchurch District Plan**

**SUMMARY STATEMENT OF MATTHEW ARMIN LINDENBERG
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

PLANNING (AIRPORT NOISE)

24 APRIL 2024

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1. SUMMARY STATEMENT

- 1.1 The purpose of this summary statement is to provide an overview of my position, as outlined in my primary evidence, including my reasoning behind the need for further amendments to the provisions proposed by Council.
- 1.2 I consider that a number of amendments are required to the Noise Chapter provisions (Chapter 6.1) of Plan Change 14 (PC14). These various amendments are summarised below, and specific details of the relief sought are set out in **Attachment B** of my primary evidence.

2. MY RECOMMENDED APPROACH FOR MANAGING SENSITIVE ACTIVITIES IN PRXOMITY TO THE AIRPORT

- 2.1 As set out in Section 8 of my primary evidence, I recommend that an appropriate rule framework within the District Plan to manage sensitive activities in proximity to Christchurch International Airport should include:
- (a) Restricting development within the 65dBA noise contour (as generally provided for through the operative District Plan framework);
 - (b) Applying specific permitted standards to the development of noise sensitive activities within the 55dBA noise contour relating to acoustic insulation (as per the general approach set out in the operative District Plan, through Standard 6.1.7.2.2 'Activities near Christchurch Airport'), plus the addition of ventilation requirements (as recommended through the evidence of Mr Selkirk on behalf of Kāinga Ora) within such a permitted standard. There would be no specific restrictions relating to residential density within the 55dBA contour. Any non-compliance with the noted permitted standards would be assessed as a Restricted Discretionary Activity.
 - (c) No density restrictions / specific permitted standards applying to noise sensitive activities / residential units within existing residential zones located within the existing 50dBA noise contour identified in 'Map A' as currently set out in the operative Canterbury Regional Policy Statement (CRPS).
- 2.2 I consider that this approach would assist to:

- (a) Better balance the various policy directions / considerations within the Operative CRPS and Operative Christchurch District Plan with the intensification policies of the NPS-UD;
- (b) Better align the Christchurch City Council approach with the other approaches proposed by territorial authorities (in particular the very recently proposed approaches by Wellington City Council and Waimakariri District Council) in relation to Wellington and Christchurch International Airports – noting airport noise effects on noise sensitive receivers are consistent across New Zealand’s major airports, and benefits are created for all Plan users when resource management frameworks for similar issues are standardised / more consistent – which helps to deliver upon the overall intent of the National Planning Standards which seek to streamline and simplify the planning frameworks and planning practice across the country. I am aware of no reason specific to Christchurch International Airport that justifies taking a wholly different approach to that undertaken in Auckland and Wellington;
- (c) Create a more consistent management framework within the Canterbury Region itself, better aligning the Christchurch City approach with the approach recently proposed by Waimakariri District Council – which in my opinion would most accurately and appropriately reflect the current direction set out in Policy 6.3.5(4) of the Operative CRPS.

3. WHICH VERSION OF THE AIRPORT NOISE CONTOURS ARE APPROPRIATE FOR INCLUSION THROUGH PC14?

- 3.1 As set out in Section 6 of my primary evidence, I consider that the ‘Airport Noise Influence Area’ proposed through PC14 – which I understand is based upon the 2021 Annual Average Aircraft 50dBA Noise Contour – would be inconsistent with the existing 50dBA Noise Contour which is currently included within the CRPS, and directly referenced within Policy 6.3.5(4) of the CRPS (‘Map A’, as referenced in Policy 6.3.5(4), is included on page 92 of the CRPS). In my opinion, I consider that the reference to ‘Map A’ contained within Policy 6.3.5(4) relates specifically to the three exceptions identified within the policy wording – being an existing residentially zoned urban area, the residential greenfield area for Kaiapoi, as well as identified residential greenfield priority areas. All three of these identified ‘exceptions’ within Policy 6.3.5(4) are identified on ‘Map A’.

3.2 Environment Canterbury has been initiating a process to undertake a review of the noise contours as they relate to Christchurch Airport, as part of the wider review of the CRPS. Of most relevance to the PC14 process – and the Council’s proposed approach of utilising the PC14 process to update the noise contours through the District Plan (in advance of such contours being updated, considered and incorporated through the upcoming CRPS review) – the Environment Canterbury website specifically states:

“We had the airport’s modelling reviewed by an international panel of experts who worked with airport staff to finalise the noise contours.

At this stage, the new contours are considered to be technical information only. The noise contour considered to be appropriate for land use planning purposes will continue to be that in Map A of the operative Canterbury Regional Policy Statement.”¹

3.3 I understand that Environment Canterbury’s current programme for the CRPS review indicates public notification of the Proposed CRPS in the later half of 2024.

3.4 In light of the above, I am of the opinion that it would be both inappropriate, as well as contrary to the operative CRPS, to seek to incorporate any updated noise contours for Christchurch Airport through the PC14 process. Instead, I consider that any such updated contours would first need to be considered, assessed and confirmed through the currently scheduled review of the CRPS. Once this process has been completed, with any updated noise contours incorporated through the review of the CRPS, I then consider it would be appropriate to seek to incorporate any updated noise contours into the District Plan – via a future, separate, plan change process.

3.5 As a result, I consider that the appropriate version of the 50dBA noise contour for Christchurch International Airport should continue to be the existing contour identified on ‘Map A’ within the Operative CRPS (referenced within Policy 6.3.5(4) of the CRPS). I do not consider that any updated noise contours should be included within the District Plan through the PC14 process, in advance of the upcoming CRPS review process.



Matthew Lindenberg

24 April 2024

¹ <https://www.ecan.govt.nz/get-involved/news-and-events/2021/council-reviews-airport-noise-contours/>

