

**BEFORE THE INDEPENDENT HEARINGS PANEL
OF CHRISTCHURCH CITY COUNCIL**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

UNDER the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER of Proposed Plan Change 14 ("**PC14**") to the
Christchurch City Plan ("**District Plan**")

**STATEMENT OF EVIDENCE OF BILLIE MOORE
ON BEHALF OF NEW ZEALAND AIRPORTS ASSOCIATION INCORPORATED**

CORPORATE

1. SUMMARY

1.1 My name is Billie Rhian Moore. I am the Chief Executive at New Zealand Airports Association Incorporated ("**NZAA**"), which is the industry association for New Zealand's airports and related businesses. In this role, I am responsible for the overall management and oversight of NZAA, including its involvement in various legal, regulatory and planning processes across New Zealand that will have implications for its member airports.

1.2 NZAA's interest in PC14 is focused on the adverse effects that proposed residential intensification in the Airport Noise Influence Area ("**Airport Noise QM**") will have on the ongoing operation of Christchurch International Airport. The Airport Noise QM is a critical planning tool for the safe and efficient operation of the Airport, as well as for protecting the health and amenity of activities sensitive to aircraft noise ("**ASAN**") in proximity to the Airport.

1.3 NZAA acknowledges that the development of further housing stock is an important issue, and considers it is appropriate that steps are being taken to enable intensified housing in New Zealand's largest cities, such as Christchurch. However, it is critical that essential airport infrastructure which supports well-functioning urban environments is not adversely affected by new intensified housing, and that communities are being developed in healthy living environments.

2. MANAGING DEVELOPMENT AROUND AIRPORTS

2.1 The nature of airport operations means that it is fundamental that airports can retain operational flexibility to meet demand, as well as provide a safe and efficient operating environment for aircraft, both now and into the future. To ensure those aims can be met, development around airports needs to be well-managed through a robust planning framework.

2.2 Certain effects caused by the use and operation of airports, such as aircraft noise, cannot be reasonably internalised within an airport's landholdings. Airports therefore seek to proactively identify areas that are currently or proposed to be subject to aircraft noise and engage in planning processes like PC14 to manage the development of sensitive activities in effects-prone areas. This is done to both manage reverse sensitivity effects and ensure healthy and high amenity living environments.

Reverse sensitivity

2.3 Reverse sensitivity is a well-recognised resource management concept. Reverse sensitivity effects have the potential to arise from new ASAN (such as housing) establishing in proximity to an airport's lawfully established infrastructure located within its designated noise contours. This exposes large numbers of people to a significant level of aircraft noise, which generates annoyance of sensitive receivers from the effects of that aircraft noise. Reverse sensitivity effects can place significant constraints on an airport's lawfully established infrastructure (eg due to complaints against that airport's operations) and its potential for growth and development in the future.

2.4 To ensure these effects are avoided or mitigated to the greatest extent possible, NZAA supports ensuring that good planning provisions and international best practice in terms of development around airports are implemented to manage the interface between airports and intensive residential development. These provisions are important and appropriate to manage health and amenity effects on people located in proximity to an airport, as well as the potential risk of reverse sensitivity effects.

Land use controls for managing urban development

2.5 To manage adverse effects on their operations from incompatible activities locating in an airport's effects area, airports rely on district planning controls like noise contours and Obstacle Limitation Surfaces, which control the type and scale of activities that can locate near airports.

- 2.6 Airports' noise effects areas are based on extensive modelling, empirical analysis and case law, which all establish that areas of high aircraft noise are not appropriate areas to establish ASAN. Airports are required to model their noise boundaries to the level where adverse health and amenity effects are likely to be experienced from aircraft noise.
- 2.7 The New Zealand Standard 6805:1992 "Airport Noise Management and Land Use Planning" ("**NZS6805**") is the industry standard for regulating airport noise and associated land use planning. NZS6805 provides that aircraft noise boundaries should be prepared taking account of future growth and recommends a minimum 10-year projection be used to model anticipated noise and developmental growth. However, much longer periods are often used for noise projections in line with the longer-term outlook of airport master planning. Christchurch Airport's noise contours are based on "ultimate runway capacity" which models the noise that will be generated when the Airport is operating at ultimate capacity. This modelling technique is important to consider the full extent of aircraft noise projections in planning decisions, including when settling land use controls within their noise contours. However, these boundaries are not static – Christchurch Airport will need to re-assess and remodel its noise contours as demand, aircraft fleets and flight paths change over time.
- 2.8 Once an airport's noise effects areas have been spatially identified and contoured in planning maps, these contours generally serve a dual purpose of controlling the level of noise that an airport can generate, as well as applying land use controls on housing density and requiring acoustic mitigation for residential activities within the noise contours.

3. AIRPORT NOISE QM

- 3.1 Christchurch Airport has three noise contours within the District Plan: the 65dB Ldn Air Noise Boundary; 55dB Ldn Air Noise Contour; and 50dB Ldn Air Noise Contour. There are land use controls within each of these contours, including density restrictions and acoustic insulation standards for residential and other sensitive activities.
- 3.2 NZAA supports the identification of the Airport Noise Influence Area as a qualifying matter in the notified version of PC14 to appropriately limit residential intensification of effects-prone areas near the Airport. The Council's Reporting Officer has also supported the identification of the Airport Noise QM as a qualifying matter (including by recommending the spatial extent of the Airport

Noise QM be updated in accordance with the 2023 remodelled noise contours) and considers that it is the most appropriate approach to achieve the relevant objectives and policies of the District Plan and the National Policy Statement on Urban Development 2020.

- 3.3 While NZAA is supportive of the provision of greater housing choices in Christchurch, residential intensification must occur in appropriate locations. Recognising the Airport Noise Influence Area as a qualifying matter in PC14 will limit the potential for intensification within the Airport's effects areas in order to provide healthy living environments and ensure that the Airport's ongoing operations and future development can occur without undue constraint.

Billie Moore
24 April 2024