

## Comments

### LTP 2021-31

Comment ID	989
Response Date	11/04/21 7:37 PM
Status	Submitted
Submission Type	Web
Version	0.1

First name

Surname

Email address

Are you submitting on behalf of an organisation? No, I'm submitting as an individual

Are you willing to tell us more about yourself? Yes

Which age category are you in? 40-64 years old

Which suburb or area do you live in?

Do you think we've prioritised the right issues and opportunities? No

What do you feel are the significant challenges and opportunities we face?

Transport links into the city - congestion due to bus lanes and cycle lanes, expensive parking. I have no option for public transport where I live.

Which of the proposed options would you like to see us progress with? Option 2: statutory work and prior commitments

Do you generally support the activities proposed in the following portfolios:

Water and Land	No
Biodiversity and Biosecurity	No
Climate Change and Community Resilience	No

**Air Quality, Transport and Urban Development** No

**Regional and Strategic Leadership** No

**Do you have any further comments on the activities proposed in specific portfolio/s (please select all those you wish to comment on):** . Water and Land

**Water and Land portfolio comments:**

This submission relates to the requirement to re-evaluate the Air Noise Contours surrounding Christchurch International Airport (CIA) every ten years.

It was required to have been completed by 2017.

During the 2015 judge-led independent District Planning Hearings by the Christchurch City Council (CCC) and Christchurch International Airport Limited (CIAL), representatives stated the reevaluation would be carried out by them in 2016 or 2017. Both accepted the requirement for a reevaluation to be undertaken. These assurances have proved misleading. No firm timeline for carrying out this promised reevaluation has been communicated to landowners adversely impacted by the air noise contours.

The Air noise contours significantly restrict landowners living under these contours and limit land use and development opportunities on their land.

Interestingly, there are no noise development activity avoidance rules restricting the development of land CIAL and CCC own. CIAL and CCC have over recent years developed land and commercial activities within the noise contours - something that its near neighbours are restricted from doing by the CIAL and CCC rules. This is anti-competitive and monopolistic. These developments have included a hotel, shopping centre with restaurants and bars and large warehouses. These are close to the airport where the noise is the loudest and most frequent. Furthermore, this is done using a planning process that excludes public input and the usual resource consent system. These allow competitive advantages that have reached a level where CIAL earns more from property development and management than from its core airport services role. The irony is that CIAL has claimed noise levels affect health and yet their developments draw thousands into their SPANZ zone daily.

Please refer to Review of BEL Report 2001-2004: "Study report on aspects of proposed variations 52 to the Christchurch proposed city plan" - 17 February 2004 Summary of Independent Review of BEL report Introduction and Summary page 1.

The NZ Standard NZS 6805: 1992 states that a 55 Ldn as an outer boundary around all NZ airports is sufficient.

The CCC is the only council that sought a lower noise activity avoidance threshold. It stated that it was protecting the rural land use around the airport as part of variation 52 and successfully, moved to implement a 50 dBA Ldn Air Noise Activity avoidance rule. At that time CIAL operated a large rural farming business that has since ceased in favour of commercial land development. This is contrary to the goal of protecting rural land that CIAL used when seeking the 50dBA Ldn Air Noise Contour.

The current plan requires the airport to operate within a 65 Ldn SEL contour but the CCC fails to monitor compliance.

**Air Noise Contour Reevaluation**

As a landowner, I seek a reevaluation of the Air Noise Contours to be carried out as a matter of urgency. The contours have not been remodelled for 14 years and yet they are still driving development decisions for everyone in the area apart from the interests of the CCC and CIAL. The contours should accurately represent current reality. Continued reliance on the current contours is inefficient in terms of the RAM which requires effective and efficient use of land. The current contours place restrictions on land use due to a modelling error (see the submission from JP Clarke at the hearings in 2015).



As a signatory to the Experts Agreement, the council has failed to resolve this matter or plan or budget for it to be carried out. The review should include the actual number of aircraft movements (prior to COVID-19 60,000 and declining), and updated noise profiles of aircraft using the airport.

Two examples of CCC actions within the 50 dB contour are Rolleston and Clearwater Resort. Both were rezoned or allowed to be developed within the 50 dB contour with NO adverse impacts on the residents or the airport operations. Both continue to be developed. Smaller landowners do not have the resources to contest this imbalance.

A further example is the development of a hotel on the airport. The acoustical expert outlined an acceptable dB level of 50 dB inside the hotel bedrooms and this consent was approved. And yet, neighbours of the airport are limited from developing their properties under the same rules.

Regards

<b>Is the proposed increase in rates affordable for your household?</b>	Neither option is affordable
<b>Is the proposed increase in rates affordable as a whole for the Canterbury community?</b>	No
<b>Do you support the changes we're proposing to how we apply Uniform Annual General Charges?</b>	No
<b>Would you support the use of borrowing for operating expenditure to offset some of the first year rates?</b>	No
<b>Do you support the rationale and proposed changes in the draft Fees and Charges Policy?</b>	No
<b>Where do you live in Canterbury? Select your district below:</b>	Christchurch city including Banks Peninsula
<b>Would you like to see us investing in the following initiatives in your area? Kaikoura</b>	
<b>Would you like to see us investing in the following initiatives in your area? Hurunui</b>	
<b>Would you like to see us investing in the following initiatives in your area? Waimakariri</b>	
<b>Would you like to see us investing in the following initiatives in your area? Christchurch</b>	
<b>Would you like to see us investing in the following initiatives in your area? Selwyn</b>	

**Would you like to see us investing in the following initiatives in your area? Ashburton**

**Would you like to see us investing in the following initiatives in your area? Mackenzie**

**Would you like to see us investing in the following initiatives in your area? Timaru**

**Would you like to see us investing in the following initiatives in your area? Waimate**

**Would you like to see us investing in the following initiatives in your area? Waitaki**

**Do you wish to speak to your submission?** No

**Would you like to be kept up-to-date with the outcome of this consultation?** Yes

**How did you find out about giving feedback?** . Word of mouth

*Your information is held and administered by Environment Canterbury in accordance with the Privacy Act 2020 and Environment Canterbury's Privacy Policy.*

**There is personal information/contact details in my submission I do not want disclosed:** Yes

**Tell us which information you do not want disclosed:** Name