

7 December 2023

Christchurch International Airport Limited response to Spatial Plan post-hearing documents

Introduction

- 1 Christchurch International Airport Limited (*CIAL*) lodged a submission on the Draft Greater Christchurch Spatial Plan (the *draft Spatial Plan*) on 21 July 2023 and appeared before the Greater Christchurch Partnership on 2 November 2023.
- 2 This document responds to the additional material prepared by Reporting Officers following the draft Spatial Plan hearings to the extent that it relates to CIAL's interests.
- 3 Firstly, CIAL records its support for the additional mark ups proposed to Maps 9 and 15 to ensure that the airport symbol is identified in the legend. CIAL also supports the recommended amendments to Map 5 (key constraint areas) to include all layers from, in particular, Map 9 (key strategic infrastructure). It is important that all constraint areas are able to be viewed together in order to direct where development is most appropriate in Greater Christchurch.
- 4 The comments below relate to questions from the Hearings Panel, and the Reporting Officer responses, to matters concerning airport noise contours.

Remodelling of the Christchurch International Airport Air Noise Contours

- 5 As outlined in its submission, CIAL considers that the Spatial Plan maps should show the 2023 50dB Ldn Outer Envelope Air Noise Contour (*Remodelled OE Contour*). The Remodelled OE Contour has been peer reviewed by Environment Canterbury's (*ECan*) own independent experts and it represents the most up-to-date technical information of the geographical extent of projected aircraft noise exposure within Greater Christchurch. The map of the Remodelled OE Contour that was included in CIAL's submission is reproduced at **Appendix 1**.
- 6 The Hearings Panel asked Reporting Officers whether the updated noise contours should be included and referred to as proposed by CIAL.¹ The Reporting Officers maintain that this is not appropriate until the Canterbury Regional Policy Statement (*CRPS*) review considers, tests and determines changes to the spatial extent of the

¹ *Draft Greater Christchurch Spatial Plan - Reporting Officers' Response to Hearing Panel Questions and Submitter Hearing Presentations* dated 14 November 2024, Question 9.

operative contours and the associated policy framework. They consider that any changes arising from the CRPS review would then be reflected in the Spatial Plan / Future Development Strategy through a three-year review cycle.

- 7 We find it very strange that the GCP should be asked to rely on information it knows to be out-of-date when there is more up-to-date technical information available that has been peer reviewed by ECan. We consider it would be inappropriate for the Spatial Plan to refer to information that the GCP knows to be wrong.
- 8 It is CIAL's position that the Spatial Plan, as a forward-looking strategic planning document for Greater Christchurch, should show the Remodelled OE Contour at least as a signal of a possible future constraint. Inclusion of the Remodelled OE Contour as a constraint area on the Spatial Plan maps does not mean that its spatial extent is "locked in", but it would ensure that planning processes that occur prior to the CRPS review have regard to the most recent technical evidence about where levels of 50dB Ldn from aircraft noise will be felt by landowners when decisions are made.
- 9 We also note the Hearings Panel question as to whether any of the draft Spatial Plan maps "lock in" elements that are or may be subject to change through other processes (e.g. CRPS review of the airport noise contours).² The Reporting Officers response explains that the Spatial Plan maps are purposefully at a high level and that other processes are to 'have regard to' the Spatial Plan (i.e. they do not have to 'give effect to it').
- 10 Once the CRPS review is undertaken, any changes to the Spatial Plan can be made through the review cycle as noted by Reporting Officers. CIAL considers that the more efficient and appropriate approach is for the Spatial Plan to incorporate the Remodelled OE Contour at the outset and, if the CRPS review results in a smaller contour for land-use planning purposes, the review cycle can be used to reduce the constraint area. Doing so in reverse risks creating development expectations in areas that are subsequently confirmed through the CRPS review to be undesirable in terms of aircraft noise effects.

² Question 18.

- 11 The risk of including the operative 50dB Ldn air noise contour, which is based on out-of-date evidence, in the interim period before the CRPS review is completed is far greater for Christchurch Airport (and the Canterbury community) than the opportunity cost for alternative land development in the interim period.

Yours faithfully



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APPENDIX A – 2023 REMODELLED 50DB LDN CONTOUR

