

# Submission 305

These are the speaking notes regarding CIAL's opposition to submission 305 (FS80), regarding a zone change from GRUZ to RLZ in the PDP at 128 Baynons Road, Clarkville.

I'm an airbus A320 captain and very much familiar with relevant operating procedures and operations at Christchurch Airport. I'm surprised by CIAL's opposition to the zone change and in reading their Noise Contour report and submissions, I have a number of concerns.

## **1. Noise modelling doesn't reflect noise abatement operational procedures**

Christchurch Airport doesn't have any form of noise abatement procedure. The ICAO Balanced Approach to Aircraft Noise, which is referred to in CIAL's report, states that noise abatement procedures are a key pillar to said balanced approach. I will discuss the ICAO balanced approach shortly.

In general, the majority of aircraft noise stems from the take-off phase, so that phase is all I'll consider in this argument.

- Firstly, the contour data has used a reduced runway threshold for its calculations. Essentially what this means, is a departing aircraft would reach a given altitude further away from the airport, than it would have otherwise had it not used a displaced threshold i.e. a departure using the full length of runway available. Essentially, this means the noise from a departing aircraft is pushed out further from the airport than it could be. Many major airports around the world including Auckland, Melbourne, Sydney etc. restrict reduced threshold departures, especially during night hours for this very reason. This is a basic noise abatement procedure that could be applied to Christchurch Airport.
- The noise contour report discusses departure profiles and highlights three options that could be used to calculate noise contours: standard – This is essentially the most noise inducing profile possible; ICAO A and ICAO B – These are both noise abatement profiles that provide reduction for noise sensitive areas in close proximity and further away from the airport respectively. The contour modelling done by CIAL was based on standard departure profile (the most noise inducing profile possible). Again, most large airports around the world utilise either ICAO A or ICAO B departure procedures (more commonly known as NADP 1 and NADP 2).

## **2. ICAO Balanced Approach to Aircraft Noise**

This is the approach CIAL have considered while producing the airport noise contours. The balanced approach consists of four pillars: reduction of noise at source; effective land use planning and management; noise abatement procedures; and operating restrictions (as a last resort).

- Reduction of noise at source. This would be difficult for an airport to control, but given increases in the technology the modern flying fleet will become quieter. The Airbus A320 NEO variants are a perfect example of this. Air NZ already have a large number of A320 NEO variants operating in NZ. JetStar have 12 in their fleet, with more arriving over the coming years and Qantas will begin replacing their 737 fleet shortly with the quieter A320 NEO aircraft.
- Effective land use planning and management. This element needs no explain and CIAL is leaning heavily against this pillar.

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- Noise abatement procedures. As mentioned earlier, Christchurch Airport have no noise abatement procedures, even though ICAO Balanced Approach states noise abatement procedures are a key pillar.
- Operating restrictions. This would include things like curfews etc. and according to ICAO Balanced Approach, is considered a last resort option. **It's important to note that noise abatement procedures are not operating restrictions!**

As stated above, the ICAO Balanced Approach consists of four pillars and in the first instance the initial three pillars should be utilised. I accept pillar 1 would be difficult to control, pillar 2 is where CIAL has heavily relied upon and pillar three has been total ignored. I would call this an unbalanced approach - an approach where CIAL has unfairly placed the burden on surrounding councils and landowners.

### 3. Noise Complaints

CIAL, claim that a lack of noise complaints doesn't mean people aren't annoyed by airport noise. I would however argue, that a lack of noise complaints means people aren't annoyed by airport noise. I've spoken with lots of people in the area and had many visitors to the property and not one person has complained about the noise.

On a personal note, I live on Southbrook Road, Rangiora and I can assure you the noise levels at Baynons road are significantly less.

### 4. Subdivision density

Given the shape, characteristics and esplanade/reserve provisions, I estimate 8 additional titles could be achieved if the property was rezoned RLZ. In my opinion, 8 additional titles, amongst the abundance of properties already in the area is insignificant and opposition to the zone change is unfair and unwarranted.

### 5. Summary

Considering the potential subdivision density is low, real time noise issues experienced at the property are insignificant and CIAL's failure to fulfil the requirements of the ICAO Balanced Approach to Aircraft Noise, especially regarding noise abatement. I strongly believe CIAL's opposition to submission 305 should be rejected.

As an acceptable solution, I suggest lodging a consent notice on titles within the 50db contour could be more appropriate.