

**Oral submission for Airport Notice of Requirements hearing
Wednesday 19 May 2021 @ 4.30pm**

- My name is Helen Salisbury. Live on Tirangi Road on the western side of the airport. Lived there for around 10 years.
- Since approximately 2017 have been a resident representative on the Air Noise Management Committee
- Am also the very recent recipient of the Quieter Homes package, having just returned home on Friday after getting the acoustic treatment installed at our property
- A couple of introductory comments:
 - I have seen some good work from the airport with the Air Noise Management Committee. One matter that was particularly noteworthy was the runway resurfacing project. I was very impressed with how the airport mitigated nuisance factor for local residents and kept them informed of the project and the timeframes.
 - Committee itself deals with noise complaints thoroughly, looking into them, identifying where possible the cause giving rise to the complaint
 - Quieter Homes package – rolling out well, albeit delayed due to, among other things, Covid. I personally am very happy with the work done on our house. Quieter Homes team and all the tradies have worked hard to accommodate my requirements, and I am very impressed with the results. Shout out to Sophie and Andi and team.
- I do have a couple of comments about the airport’s notices of requirement for the Main Site Area and the East Side Area. I should start by saying that I have not been able to read all the documents submitted in relation to the application itself and this hearing. It is possible, even probable, that some of what I am about to say has been considered and addressed, and I have just missed it. Furthermore, I appreciate that this may not be the appropriate forum to raise some of my concerns, but it’s pretty confusing knowing where and when you should raise things. These are issues that I do want to be considered, however, so these are my thoughts:
- There are two main areas of concern that I have had for a number of years:
 - Whether the noise from taxiing airplanes is being included in the noise monitor readings
 - Air quality – polluting emissions from planes

Noise from taxi-ing planes

- Note the definition of “aircraft operations” in the definition section of the Operative Wellington City District Plan means:

The engine runway, taxi-ing, take-off or landing at an airport of an aircraft, and “operate” has a corresponding meaning.

For some reason Rules 11.1.1.1.1 and 11.1.1.1.3 are on the e-Plan but can’t be printed. However, I can see from Matthew Borich’s Technical Review that under the heading “Aircraft operations in general” at paragraph 4.1, the relevant section of the Operative Wellington City District Plan reads:

Aircraft operations shall be managed so that the rolling 90-day average 24 hour night-weighted sound exposure does not exceed a day/night level (Ldn) of 65 dBA outside the ANB....

reference to aircraft noise being measured in accordance with NZ Standard 6805: 1992 (I have not been able to access that).....

the level of noise from aircraft operations, for comparison with Ldn 65 dBA, is calculated from the total amount of noise energy produced by each aircraft event (land or take-off) over a period of 90 days.

I see a contradiction here – whereas “aircraft operations” is defined to include not just take-off and landing but also taxi-ing, the sound measurement appears to be calculated only from point of take-off and ends at landing.

As an ANMC member I questioned what noise was included in the “bucket” of noise making up the 90 day rolling average, and was told in early 2017 that the only “aircraft noise” recorded is from take-off and ends with landing, that it explicitly does not include taxi-ing. This is matched to Airways records for flights and my understanding is that remaining noise is excluded from the “bucket” of noise.

This is also consistent with the Air Noise Mitigation Deed and Building Contract that we signed as part of the Quieter Homes package which defined “air noise” as the *noise created by the Airport Operations*. “Airport Operations” were in turn defined as:

all operations carried out by Wellington Airport on the airport property including:

(i) *The operation of aircraft during take-off and landing;*

but excluding:

(ii) *Aircraft taxiing [and other things].*

If my understanding is correct, then I consider that the noise contours drawn by the airport significantly underreport the actual amount of noise experienced by local residents arising from aircraft operations. This becomes particularly important when considering the acknowledged audible increase in noise proposed for the East Site Area.

If this is the case, then it appears to be a different approach to other airports:

- Christchurch Airport – *Operation aircraft noise is the noise emitted from an aircraft during taxiing, take-off and landing procedures. The Christchurch District Plan requires operational aircraft noise does not exceed 65 dBLdn within the [ANB]*
- From the limited research I have done the same applies for Queenstown Airport, Hamilton Airport, Whangarei Airport

Had wondered if the noise monitoring equipment was capable of recording taxi-ing noise but understand that it can and that it is in fact standard to do so.

At paragraph 15 of Laurel Smith’s brief of evidence she states “*typically noise from aircraft operations (arrivals, departures and taxiing) is considered when setting [ANB].*”

At paragraph 22 she says:

“Noise from Aircraft Operations (arrivals, departures and taxiing) is controlled by a 65 dbLdn noise limit at the ANBRules 11.1.1.1.2 to 11.1.1.1.6 set out a range of exclusions from the ANB noise limit and further operational controls such as night time restrictions.

I am struggling to understand whether the noise measurements taken by Bruel & Kjaer include or exclude the noise from taxiing airplanes. I think they exclude it. However, there is no reference to this in Ms Smith's evidence.

It is unclear to me what is intended in the Proposed Conditions for the Designation around taxiing noise for the Main Site Area. I think it is to convert the existing District Plan airport noise provisions into the designation, so if it currently excludes it, it will continue to exclude it.

If it is correct that this is not even counted in the "bucket" of noise from aircraft operations, it would seem to me to create quite misleading and under-reported noise levels.

I submit that all noise from taxi-ing aircraft should be included in the "bucket" of noise (if it is not already), and if it is not, we should see what impact that has on the noise contours. Only then, should a decision be made around should be allowed on the East Site Area given the acknowledged increase in noise for local residents.

My personal experience is that I find the constant whine of taxi-ing of far greater nuisance value than the intermittent departure and arrival of planes. There is something inherently more annoying about the whine of a taxi-ing plane than the changing resonance of a plane taking-off or landing. It has a significant impact on amenity.

- I note at paragraph 56 of Ms Smith's evidence when fully operational the East Site Area is estimated to have a total of 24 operations per day of Code C and Code E aircraft. The sound exposure level from the taxiing aircraft in the East Site Area is predicted to be equivalent to a jet departure for Code C aircraft and twice as loud as current departures for Code E aircraft. That is significant
- I understand Mr Borich proposed that no taxiing under power be permitted on the East Site Area taxiways at night. I am unsure whether this has been accepted by the airport. In my submission, this restriction should be excluded to all taxiing activity on the East Site Area. If there are fewer than 24 operations per day in 2050, then arguably it would be easier to implement operationally. If in fact there are more than 24, then the noise nuisance for those residents on the Eastern side of the airport would be even greater than anticipated.

Air pollution

- Am not sure if this is the correct place to raise this issue, but will quickly do so.
- Understand that discharge to air from aircraft is a permitted activity
- Also understand that air quality is something that is monitored by the Regional Council, who have defined the Wellington airshed as essentially the entire city
- Also understand the national interest and importance of air travel
- However, I am mindful that in the Greater Wellington Regional Council's own documents, there is a recognised air quality issue for those who live and work by the airport. Wellington's airport nestled right amongst residential suburbs. Part of its appeal and its limitation.
- In the 2000 Air Quality Management Plan the Council notes at page 10 "*discharges from aircraft can have significant localised effects in and around the Wellington International Airport.*"
- At page 11 it says:
Discharges to air from aircraft using Wellington International Airport have been identified as an area of possible concern to people living and working around the airport. Sources of emissions at airports generally relate to the approach, landing, taxiing, take-off and initial climb of aircraft. Discharges from aircraft include nitrogen oxides, carbon monoxide, unburned hydrocarbons and smoke. ...

Pungent kerosene fumes are most evident in the summer on still days.

...

The Council has little substantive information on the contribution of these mobile sources, either to local air pollution, or to the ambient air quality of the Region as a whole.”

- I believe the airport should be required to undertake regular monitoring of the known pollutants from airport operations. There is a recognised dearth of empirical data about this and it is appropriate for baseline readings to be taken, so the impact of future airport development proposals can be forecast based on actual data about air pollution, or the lack thereof.
- Understand Whangarei District Plan has a provision for the airport to monitor the effects of the use of aviation fuel. Consider something similar would be appropriate to be included in relation to the Notice of Requirements or the Wellington City District Plan.

Final comments – merely repeat what is in my written submission:

- I believe the engine testing exclusion area should also include those parts of Precincts 1 through 6 that have residential neighbours within a certain distance
- I do not think it should be permissible to build a 12-15-20 metre high building at 5.5 metres from the airport boundary where there is an neighbouring residential dwelling. Execujet hanger is an example of where I think the airport has applied a rule to the significant detriment of the adjoining houses.
- Finally, I make a general observation about dire traffic currently experienced in eastern suburbs, which will only increase with predictions of increased passenger numbers, but do appreciate that is beyond the control of the airport itself.
- Thank you for the opportunity to present this submission today. Happy to answer any questions.