

**BEFORE THE INDEPENDENT HEARINGS PANEL AT WELLINGTON CITY | MUA  
NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE NGĀMOTU O TE WHANGANUI-  
A-TARA**

**UNDER THE Resource Management Act 1991**

**IN THE MATTER OF the hearing of submissions on the Proposed Wellington  
City Plan**

**HEARING TOPIC Hearing Stream 5**

**STATEMENT OF EVIDENCE of Guardians of the Bays Inc**



**1. Introduction**

- 1.1 My name is Yvonne Weeber I am the Chair of Guardians of the Bays Inc (GOTB).
- 1.2 GOTB is an incorporated society that represents concerned Wellington residents working to reduce the adverse effects that arise from Wellington airport on the land surrounding the airport made up of predominately pre-existing residential neighbourhoods and the sea at either end of the airport runway.
- 1.3 GotB objectives are to reduce the adverse effects that arise from Wellington airport including proposed runway extensions, expansions, increased aircraft and land transport movements and other related activities on the environment. The adverse effects may include but are not limited to coastal reclamation, emissions, noise, stormwater, reduction of visual and landscape amenity and neighbourhood disruption.
- 1.4 In June 2022 GOTB were part of a mediated Environment Court agreement for the conditions on the Man Site Area designation and the East Side Area designation (the expansion of the Wellington Airport into the southern section of Miramar Golf Course).
- 1.5 GOTB made submissions and further submissions on the Proposed District Plan.
- 1.6 This statement relates to Stream 5 in particular to:
  - i. Noise both the:
    - a. Inner and Outer Air Noise Overlays, and Air Noise Boundary (noise from aircraft using Wellington Airport)
    - b. Designation chapter (WIAL designation noise conditions)
    - c. Subdivision chapter (subdivision of land affected by air noise provisions)
  - ii. Natural Hazards
  - iii. Coastal Hazards.

- 1.7 GOTB would like to thank the Council Officers for their thorough evaluation and recommendations of submissions in Hearing Stream 5 and the ongoing administrative support of these hearings.
- 1.8 GOTB have reviewed the documents supplied for Hearing Stream 5 including:
  - i. Wellington City Councils (WCC) Section 42 Analysis Report prepared by Council Officers relating to Noise and Natural Hazards and Coastal Hazards;
  - ii. Appendices with track changes being proposed by the council;
  - iii. Statements of Evidence from WCC experts and rebuttal statements.
  - iv. Relevant submitters material including statements of evidence, submitter statements and rebuttal statements.

## **2. Noise -Introduction**

- 2.1 GOTB agrees with Wellington City Councils section 42A analysis (3 July 2023) that some of that the key issues in contention on the Noise Chapter are:
  - a. Airport noise in relation to reverse sensitivity.
  - b. The relationship between the designation conditions and standards in the Noise chapter.
  - c. Acoustic insulation and ventilation in relation to the airport.
- 2.2 We generally support Wellington City Councils recommendations in their section 42A report. However we have concerns about some of the changes proposed and how they will affect the local community in future in understanding the District Plan and the relationship to the Airports designations. This will affect in particular how the community can make noise complaints.
- 2.3 The noise caused by Wellington Airport comes from aircraft parking, taxing, taking-off and landing. These noises have significant negative effects on the residents in the eastern suburbs. The community who live around Wellington Airport have to deal with noise throughout the day and a large amount of the night.
- 2.4 GOTB questions the continued use of the NZS6805:1992 Airport Noise Management and Land Use Planning standard. These standards are now over 30 years old. Land Use Planning has and is about to undergo radical change. The community health and amenity values affected by noise are better understood. We realise that it is not up to the Panel to write a new standard but something should be done to update the NZS6805 standard and consider new reports such as the 2018 World Health Organisation Environment Noise Guidelines for the European Region. The strongly recommended reduced noise levels produced by aircraft in this WHO report are for aircraft noise to be below 45 dB Lden during the day and 40 dB Lnight during the night.
- 2.5 The WHO report strongly recommends airport noise reductions due to the adverse health and sleep affects to the community. Health impacts of airport noise include cardiovascular disease, hypertension, stroke and child blood pressure, annoyance, cognitive impairment, hearing impairment and tinnitus and sleep disturbance. These are all issues that need to be considered when looking at noise created from Wellington Airport.

### **3. Noise- Reverse Sensitivity**

- 3.1 Wellington airport was constructed in the 1950s within the urban form of an existing residential community. The residential buildings are in many cases over 100 years old and either need ongoing maintenance, retrofitting and management or they need to be redeveloped.
- 3.2 GOTB is neutral on urban intensification. We do know that new residential development as opposed to urban intensification around Wellington Airport would have many positive benefits of improving the existing residential buildings with better noise and thermal insulation, orientation, indoor layout and facilities. Creating a win-win for the community and Wellington Airport. Stifling new residential development will however result in the persistence of old residential buildings that are not fit for purpose and ultimately airport blight.
- 3.3 The current noise constraints on the operations of Wellington Airport are imposed because of the detrimental effects of aircraft noise on the surrounding residential community. The operational constraints allow Wellington Airport and the surrounding community to live together.
- 3.4 GOTB are not dismissive of the reverse sensitivity issues that Wellington Airport face. However, the use of community pressure to reduce the noise created by Wellington Airport as detailed in Kirsty O'Sullivan's rebuttal evidence is misleading. The community has objected vocally, persistently and through the courts to reduce the negative noise effects from Wellington Airport since the first jet engine flights in the 1970s. This is not a new issue. This is a 50 year old issue. Noise complaints and any increases in noise complaints should not be seen as a negative by WIAL but as a positive that the community is aware and cognisant of airport operations.
- 3.5 Wellington Airport is definitely not Whenuapai Airport or Queenstown Airport. Comparisons with past court cases and these airports is misleading and do not provide a true picture of the long history, unique nature and ongoing development of the noise issues and their planning controls at Wellington Airport.
- 3.6 Curfews on airport operations surrounded by residential communities are not a negative aspect of planning. They are actually a positive as they allow the airport to exist within our residential community. However, due to the health issues of disturbed sleep from airport noise many international airports have longer curfew periods than Wellington Airport.
- 3.7 GOTB supports the Quieter Homes Programme however we would like houses within the Inner Noise Overlay/Air Noise Boundary to occur faster.
- 3.8 GOTB welcomes and encourages ongoing reduction on aeroplane noise as has occurred since 1971 with improved aircraft engineering and future management of all planes when parking and taxing at aircraft terminal.
- 3.9 GOTB supports the Air Noise Management Committee. However, we would also support WIAL having regular open days (similar to ones discussed for Queenstown Airport in Kirsty O'Sullivan's rebuttal evidence) where the community can come and talk to WIAL about their concerns on the aeroplane parking, taxing, take off and landing and noisy activities such as bird control.

#### 4. Noise chapter changes proposed in WCC's Section 42A Analysis for the Proposed District Plan (PDP)

- 4.1 GOTB supports the tidying up of the definitions of the Air Noise Boundary and Air Noise Overlays (outer and inner). It is important in defining the affected properties in the District Plan making it clearer the distinction between the overlays and the boundary. Retaining the Air Noise Boundary and Air Noise Overlays is important in the community understanding where these boundaries lie on the land.
- 4.2 GOTB supports the written explanation in reference to the lines of the Inner and Outer Air Noise Overlay and Air Noise Boundary (Figure 1) explained in words (Introduction to Airport Zone Chapter para 5).
- 4.3 GOTB supports the Information in the introduction of the Noise chapter on the restrictions to development and the need for acoustic insulation and ventilation standards in noise sensitive activities as a way of managing noise effects in the Air Noise Overlay (Inner Air Noise Overlay and Outer Air Noise Overlay).



**Figure 1**

The Air Noise Overlay (Inner Noise Overlay, Outer Noise Overlay and yellow line of the Air Noise Boundary and edge of the inner noise overlay) as represented in the Wellington City Proposed District Plan.

- 4.4 GOTB recognise that there are reverse sensitivity issues with Wellington Airport. However, the burden to the community of extending this affected party status beyond the Inner Air Noise Overlay would appear considerable. We agree with WCC that seeking restrictions on urban development due to aircraft noise within an already existing urban residential area will lead to considerable detrimental effects and could lead to airport blight where little or no development takes place and the existing old (in some cases Victorian) residential building deteriorate.
- 4.5 GOTB are concerned that no one in the Outer Air Noise Overlay, the residents of Roseneath, Kilbirnie, Rongotai, Miramar South and Marpuia, actually knows what is being proposed by WIAL in their submission. The WIAL proposed changes are considerably different than the PDP and considerably more restrictive on any new development if WIAL is given affected party status in the Outer Air Noise Overlay.

- 4.6 GOTB believes the WCC proposed inclusion of “Wellington International Airport being considered an affected party for applications just within the Inner Air Noise Overlay” is a good compromise to the Wellington Airport reverse sensitivity issue.
- 4.7 GOTB supports the design requirements of NOISE-S4 and NOISE-S5. While we are aware of WIAL’s view that these standards could result in greater construction costs we support an improved internal residential environment and the quality of reduced noise this will create for the eastern suburbs residents in the future.
- 4.8 GOTB supports providing greater clarity on Noise S6 Ventilation requirements on habitable rooms as it provides clarity of what is required.
- 4.9 GOTB does not support the removal from the of the bottom-line limits and controls in the designation conditions from the Proposed District Plan.
- 4.10 GOTB does not support the removal of the Noise S9 East Side Precinct Aircraft Operations and operation of Auxiliary Power Units(APU) and Noise S13 Airport East Side Precinct residential noise mitigation from the PDP. The operation of the APU’s and the reduction of APU noise is complex and difficult for many to understand. However, control of this noise is very important for the Strathmore Park community.
- 4.11 We agree with Mr Jon Styles, evidence for Kainga Ora (para 8.6), that having noise limits and defined controls in the District Plan and the Designation conditions aids the community, who live with the noise and make noise complaints, in understanding how all the planning provisions work. Its complex and having things buried within a designations and out District Plan creates confusion. This is not positive for the community and makes the community powerless. The District Plan needs to provide a pathway for everyone to understand how it works and how all the parts work with the designations.
- 4.12 If the panel decide to remove the designation conditions for the East Side Precinct Aircraft Operations, including operation of APU’s and residential noise mitigation then we ask that a reference is given to the designation. This will allow the community to know where to find the noise control matters in relationship to the East Side Precinct.
- 4.13 GOTB accepts that bird control within the Airport Zone is necessary in respect to aircraft safety and this should comply with the Airport Noise Management Plan. However, it is an ongoing concern to the community and we would suggest that WIAL keeps talking to the local community about their bird management.

## **5. Natural Hazards**

- 5.1 GOTB supports the uses of natural hazard mapping being embedded in the District Plan with the retention of the liquefaction hazard overlay and flooding ‘inundation areas’ on Wellington Airport. These overlays are important as they creates a total picture of what could occur and a reflection of the geology, reclamation and water catchment of the area.
- 5.2 GOTB notes in relationship to the liquefaction hazard overlay that Wellington Airport is built on a variety of substrates including reclaimed land. The majority of the airport was constructed in the 1950s. As past earthquakes throughout the country and world have shown, old engineered substrates are prone to liquefaction.
- 5.3 GOTB notes in relationship to the flooding inundation the airport has one major stormwater pipe connection going under the airport from the large Strathmore Park catchment into Lyall Bay. If this pipe has over capacity flow and/or is blocked in anyway

Wellington Airport will flood. Blockages occur from what is coming down the catchment or climate change effects of higher sea levels and higher ground water table levels.

- 5.4 GOTB is concerned that it is not clear what 'natural hazard mitigation works' are that WIAL can undertake within the Natural Hazard Overlay.

## **6. Coastal Hazards**

- 6.1 GOTB supports the inclusion of storm surges and storm events in the Introduction to the Coastal Environment Chapter.
- 6.2 GOTB supports the general approach proposed by WCC in regard to the Coastal objectives, policies and rules.

Yvonne Weeber

Chair of Guardians of the Bays Inc

28 July 2023