

HS5 Speech Notes for 3/8/2023 on behalf of Strathmore Park Residents
Association incorporated

Good morning Commissioners, Officers & other attendees.

I am Glenn Kingston, local resident since 1970 & currently Treasurer of the Strathmore Park Residents Association. Our Association has existed as an incorporated society from 1944 & has taken part in most significant suburban development since that time. I have been an officer of the Association since 1978.

I also served for 6 years as an Eastern side residents' representative on the AirNoise Management Committee from its formal establishment in 2001.

Our Association has made several points in our submissions and today I will deal with just the Noise related issues appropriate to Hearing Stream 5. I confirm that I am a lay person having read in full the relevant S42A recommendations to the Hearing Committee & this submission represents in some areas a shift in emphasis and also attempts to improve clarity of our formal submissions by way of response to the S42A report of 3rd July 2023.

1. Definitions of Inner & Outer Air Noise Overlay & Conditions.

PDP References: Part 1 Schedule 1 NOISE P4, NOISE P6 & AIRPZ

Our Allocated Reference: SPRA FS122.4

S42A References: §89 Noise Rec5

Our Association supports the use of the terms “Inner & Outer Air Noise Overlays” & the clarifications recommended in the S42A report to correct the noise limit ranges forecasted to be experienced within each of these.

2. Outer Air Noise Overlay

NOISE Part 1 Schedule 1. NOISE-S4, S5 & S6

Our Allocated Reference SPRA 371.1

S42A Reference: 3.7 Rules 3.7.1 §163 General Matters a. & §232

Our Association had originally requested an outer noise area to be established with the main purpose to include mandatory noise mitigation measures to be applied to existing residences which experience 60dB_{Ldn} or greater outdoor noise levels at their property.

Council included an outer Air Noise zone Overlay but, in their wisdom, rejected any concept of noise mitigation by the emitter and instead applied the full weight of their proposals to mitigate reverse sensitivity by requiring property owners as “receivers” to apply noise insulation &/or ventilation at their cost to all new residences or extension to any residence within the modelled Outer Air Noise Overlay based on a 2050 forecast supplied by WIAL.

We disagree with the omission of any responsibility of the emitter to mitigate noise for existing residents and we also disagree with the extreme extent of the footprint of the proposed Outer Air Noise Overlay.

As quoted in the S42A there are (*to be*) 496 existing residences within the Inner Air Noise Overlay and 1282 for the PDP within the 2050 Outer Air Noise Overlay.

From the PDP our Association notes from the introduction of the “Noise” Chapter R15:-
“Section 16 of the RMA imposes a duty to avoid unreasonable noise by adopting the best practicable option (BPO) regardless of whether the activity complies with a standard or rule. Section 17 of the RMA further imposes a general duty to avoid, remedy or mitigate adverse noise effects”.

The S42A report to you also states at §36 a. under heading **Equity**:

“That emitters and receivers of noise have shared responsibilities in relation to the noise environment. Section 16 of the Act places an obligation on emitters to adopt the best practicable option to ensure that the emission of noise does not exceed a reasonable level.”

In the Outer Air Noise Overlay we believe that the PDP provisions are entirely in favour of the emitter. In our view a Best Practicable Option for the noise emitter is to include noise treatment to existing residences within the Outer Air Noise Overlay which are experiencing (or likely to experience) 60dB_{Ldn} or more at their property. This option is currently mandated to apply to the Inner Air Noise Overlay for properties which may experience 65dB_{Ldn} or more noise levels & is thus proven to be practicable.

Our offered proposal was to trigger existing residents noise mitigation measures on a modelled 60dB_{Ldn} actual noise exposure overlay based on measured levels at the 65dB monitoring points. Alternatively this Outer Overlay could be established by a shorter term forecast (say 1 year) which would take account of many variables in the 2050 forecast such as uncertainty to the future of Airline travel, climate change regulations, introduction of wide bodied jet aircraft in Wellington and introduction of quieter and/or electric engined aircraft.

By way of precedent a recent Plan document applying to Auckland Airport, including rules for the new Northern runway, is the Auckland Super City Unitary Plan operative 2016. This plan uses the NZ 6805 1992 Standard for measurement purposes but sets lower exposure levels (in an area defined in the Plan as the Moderate Aircraft Noise Area [MANA]) which qualify homeowners for subsidised ventilation, heating & kitchen rangehood provision.

The Auckland Airport noisebands covered for fully subsidised noise treatment extends to the 65dB_{Ldn} boundary & a 75% subsidised treatment package is available for residences located within a band extending out to the 60dB_{Ldn} level (MANA as above), and to 58.5dB_{Ldn} (with a 1dB permitted increase for special use circumstances) from Air Noise arising from use of the newly consented “Northern Runway”.

The Auckland noise level boundaries are based on historic microphone measurements as per NZS6805 extrapolated to cover noise levels expected to be reached in the following year and further manipulated to represent the footprint of nominated band boundaries. The NZ standard of 1992 has continued to be adopted in Auckland but the allowable noise levels have been reduced to more reasonably match public health criteria & expectations.

By these measures the uncertainties of long-term noise forecasting are minimised, mitigation measures are applied only to those existing residences proven to experience

noise levels of 60dB_Ldn or greater and similarly the owners' mitigation building rules are applied in a more nuanced timeline which also ensures that expense is not borne unnecessarily by owners of residences which may never experience 60dB_Ldn noise level.

The S42A report acknowledges in §169:-

"For additional context, we note individual aircraft types have become less noisy over time, and this trend will likely continue as technology progresses"..... "The ANB in the operative district plan was established in the 1990s, when many aircraft were noisier than today."

We commend the Auckland Unitary Plan approach & recommend that this be applied in the Wellington DP for specifying the extent of the Outer Air Noise Overlay & rules within.

3. Time limit for application of mitigation measures for existing residents within the Inner Air Noise Overlay

PDP References: Part 1 Schedule 1 NOISE S4, S5 & S6

Our Allocated Reference is SPRA 371 but not acknowledged in the S42A report.

S42A References: §231 - but only GOTB was acknowledged.

Our Association submitted that a time limit should be set for the completion of noise mitigation measures (QHP) to existing residences located within the Inner Air Noise Overlay. The concept was set down as a study item for the formal Air Noise Management Committee operative in 2001. Noise bands were defined and verified within the Inner Air Noise Overlay. By 2012 all residential owners within the Inner Air Noise Overlay were notified of their eligibility for insulation & ventilation & the conditions for their offer. The matching press release stated that completion would be within 10 years for around 650 notified residences. Now almost 12 years later (23 years from concept) only a portion of residences have been treated, we understand none in our suburb which are all close to the ANB, and we consider that a time limit should now be set within the PDP for completion of this work.

Similarly (*on the assumption that our above concept of QHP within the Outer Air Noise Overlay is accepted*) we submitted that a time limit be also set for noise mitigation measures to be applied for residences exceeding (*modelled*) 60dB_Ldn Noise levels located within the Outer Air Noise Overlay.

4. Requirement for WIAL to become an affected party to resource consent applications for noise sensitive activities within noise Overlays.

PDP References: Noise R3

Our Allocated Reference FS122 to WIAL 406 sub number 407

S42A Reference: §178

Our Association concurs with the S42A recommendation to not permit WIAL to be an affected party for noise sensitive resource consent applications within the Outer Air Noise Overlay.

5. ESA Timing of QHP treatment to be offered to the listed residences “prior to the commencement of the construction phase”

PDP References: Part 1 Schedule 1 NOISE S13

Also Our allocated reference SPRA 371

S42A Reference: Not specifically acknowledged

All residences affected by this Condition are within Strathmore Park and our Association supports the existing PDP wording which advanced the mitigation treatment from “before the commencement of wide body aircraft operations in the ESA”. We offered that the construction phase would also be a significant noise nuisance to the same listed residences.

Thank you for providing the opportunity for our Association to submit on the above issues.

End of Submission