

21 August 2018

Jen Andrews
Manager – Communications and Community
Queenstown Airport Corporation Ltd
Queenstown

Dear Jen

BARNZ support Queenstown Airport Proposed Noise Changes

The Board of Airline Representatives New Zealand (BARNZ) supports the proposed noise changes outlined by Queenstown Airport. BARNZ considers that the changes to the noise boundaries, the airport designation and the District Plan, are the most appropriate approach for accommodating future forecast demand for air services to and from Queenstown taking into account the principles of sustainable management.

BARNZ is a membership association representing 29 airlines that operate into New Zealand on matters that they can deal with collectively, including the four airlines (Air New Zealand, Qantas, Jetstar and Virgin Australia) that operate commercial flights into Queenstown. Our members are committed to being responsible partners with local communities as we seek to grow air connections in a sustainable manner.

The need for the proposed noise boundary changes

As a premier destination, demand for air services into and out of Queenstown has grown rapidly and we expect this growth to continue based on trends to date. Airlines would naturally like to meet this demand by providing the services to and from Queenstown that customers want.

Air services provide valuable domestic and international connections for Queenstown's community. Air services directly support the region's economy by transporting a large percentage of the tourists who visit Queenstown and the wider region. If Queenstown wants to continue to grow its air services and connections, the airport will need to increase capacity to accommodate this, including the proposed changes to the air noise boundaries. Without these changes, air services into Queenstown will effectively be

capped in 3 or 4 years' time. Put simply, if new flights cannot be accommodated, growth in visitor numbers will diminish. This would be likely to increase the price of air travel to and from Queenstown, reflecting the limited capacity, with additional flow on effects for the beneficiaries of tourism activity. Conversely, regional economic growth will be enabled by adding new flights beyond the constraints that will apply within the next 3 or 4 years.

As explained by the consultation document, the noise boundaries must be altered to enable and accommodate this growth.

In supporting the proposal, the airlines are aware that the decision on the future capacity of Queenstown Airport is one centred on the wider question of how much tourism growth the wider Queenstown community should embrace.

From our perspective, Queenstown Airport Corporation has responsibly proposed a sustainable long-term growth target that strikes a balance between the potential growth of the airport and the regional economy and the effects of that growth and increased passenger numbers on the community. This translates to a long-term growth target of 5.1 million passenger movements being reached over the next thirty years rather than by 2031.

Importantly, changing the noise boundary does not mean that the number of flights will increase rapidly up to the new noise boundary limits. It just provides more capacity for additional flights to be accommodated in future, where there is demand for those services.

We also believe it is worth noting that the noise boundary changes are not being driven by aircraft becoming noisier; in fact aircraft noise has decreased substantially in the last few decades due to technological improvements and we expect this progress to continue.

Importance of Changes to the Airport Designation and District Plan

BARNZ also supports the corresponding proposed changes to the airport designation and district plan.

The airlines support the extension of noise mitigation obligations as the appropriate management of the noise effects on occupiers of properties impacted by the proposed changes to the noise boundaries, recognising that ultimately airlines and their customers, as the generators of aircraft noise, pay for noise mitigation measures via their airline ticket.

We also support the importance of the proposed updates to rules relating to Activities Sensitive to Aircraft Noise (ASANS) as:

- a) The removal of commercial visitor accommodation from the definition of ASAN aligns with the approach taken at other airports in New Zealand and recognises that there is a demand for such typically short-term accommodation close to airports.
- b) Proposals to discourage new ASANs within the air noise boundary, while providing for extensions to existing activities and new builds with appropriate mitigation standards represent a best practice approach to noise management that is consistent with the New Zealand Standard 6805.

We see the measure to consolidate all aircraft noise related information under one chapter in the District Plan as sensible.

It is noted that the approach to noise management outlined by Queenstown Airport Corporation Limited includes maintaining the consented hours of operation and the use of improving aircraft technology to improve noise emissions.

We commend Queenstown Airport Corporation to their commitment to open dialogue with the Queenstown community on this important matter and thank you for the opportunity to comment.

Yours sincerely

Justin Tighe-Umbers
Executive Director