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**Submission: Ashburton District Council
Draft Ashburton Airport Development Plan 2022 -2052**

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- 1. Introduction:** We own our property located on _____ which sits between the flight paths of Runway 06, 34 and Runway 02, 20

The purpose of our submission is to highlight concerns of residents who will be impacted by the increased development proposed by the Ashburton District Council at the Ashburton Airport. We request to make an oral submission.

We also have some questions that require further expansion than what is currently supplied in the Draft Developmental Plan.

As landowners we purchased our property 10 years ago with full knowledge of the close proximity of the local airport, there was no inclusion on the LIM regarding any strategic plan for future development at the airport. The now proposed and significant changes to make the Airport become an independent and commercially viable will have an impact on us as Airport neighbours. While we are not against development of the airport it must be done in respect of the rights of the current landowners and residents as we see these proposals being no different to a commercial factory requesting to operate at the same location.

As the Ashburton Airport Authority, governed by the Ashburton District Council is responsible for the administration and control of the Airport, the Ashburton District Council now finds itself in the absence of any strategic plan for the Ashburton Airport and in the situation where they have granted peppercorn leases and are now attempting to sidestep and minimise their fiscal responsibility by allowing increased commercial and residential activities by the implementation a long-term strategic plan on a site to the detriment of existing residents that will have a major impact on those living in close proximity to the airport.

- We recognise the need for the Ashburton Airport to become a financially self-sufficient entity which includes commercial operators and businesses operating from the Airport zone.
- We recognise the need for increased Recreational Hangers
- We question the positioning of the Commercial Hanger Precinct

- We recognise the resulting need for airport enthusiasts to build and purchase Hanger homes.
- We **do not** support Sky Diving operations from Ashburton Airport.

While there is a need for the Airport, ratepayers should not be contributing to ongoing costs of the Airport that is primarily used by a modest number of persons per capita, which presently does not provide any significant financial return to the Ashburton District or businesses within the district.

The Ashburton District Council does not supply financial support at this level to other organisations in the district such as sporting groups and clubs.

The council has identified a need to lessen the impact on neighbouring residents resulting from increased air traffic from commercial operated businesses and users.

The most impactful change to increased activities is noise. On page 11 of the draft plan, it is misleading to state that the ADC has plans to 'review the noise contours' and adapt a 'performance plan' for the Ashburton Airport

As aircraft are governed by CAA rules and regulations once an aircraft is mobile including in the air. The Ashburton District Council has no governable control over the operating noise of an aircraft once that aircraft is in movement, how then is the Ashburton District Council's proposed revision of noise contours and performance standards to reduce impact on nearby residents going to be achieved? How are the public and affected neighbours able to submit questions or objections when we are not provided with a clear understanding of the proposed noise contours or of the inability to regulate them.

Recreational hangers are highly profitable and saleable growing trend and are sought after by aviation enthusiasts. The Council has identified this is the most economical income stream for a sustainable future for the airport. The council should have the foresight to expand the airports footprint to accommodate both recreational and commercial hangers within one site precinct. Leaving the Seafeld Road area open visually.

Commercial Hanger Precinct

The draft development plan vision to have an open green space enclosed by a line-up of large tin Commercial and Hanger homes, lacks planning, foresight and future growth and does not recognise the responses from Airport neighbours.

The ADC has surveyed by way of an initial feedback survey a very small number of residents. Those surveyed indicated that there is very little support from Airport neighbours for a commercial precinct to be developed along Seafield Road and listed a number of concerns if one was to be developed there.

Supported feedback from users should not be taken into consideration as those users have a vested interest to make the airport financially viable or face losing funding input from ADC.

A traffic management plan has been provided for around the Airport Museum, but nothing provided for the Commercial Precinct. Public and Airport neighbours need to have made available concept plans that include placement of access to and from this precinct, designated parking, plantings to soften the visual impact of buildings, proposed restriction to reduce light pollution before acceptance of this draft development plan.

The proposed site of the Commercial Hanger Precinct on Seafield Road on 1.3ha to accommodate commercial hangers, support buildings, sufficient off-road parking, including designated disabled parking, business operators, staff, clients and flying school students whilst allowing for the 75m clearance from nearby runways as per regulations is ambitious.

Placement of the commercial hanger precinct would be better sited at the Murdoch's Road/ Milton Road Corner area adjoining the recreational hangers to retain the current visual and ascetically open green space. By adjoining both precincts on one site not only reduces the costs of shared infrastructure it increases the safety of commercial operators away from three commonly used runways and a public road with increasing public and commercial traffic. Whilst this might be a conflict with private aviation users, those users who have a vested but conflicted interest should not direct the outcome of the airport's future development.

Whilst the Ashburton Airport has always allowed commercial hangers and operations, this should not override the rights of nearby residents and landowners to consult on the significant planned number of buildings and the visual and safety concerns this increased number will have on Airport neighbours and road users.

The previous Sky Diving business operated out of a hanger area situated by the Aero Club not the hanger on Seafield Road. The draft Ashburton Airport development plan is incorrect in stating that Sky Diving had previously operated from hanger situated on Seafield Road, without any infrastructure to operate a business

i.e.: potable water, sewage, power and parking. This is misleading in so much that it creates the illusion of an existing use in that area which is factually incorrect. This has helped the Council justify in the draft development plan the placement of the Commercial Precinct under the premise of an existing use.

Sky Diving operations and its noise were the predominate cause of complaints by surrounding residents and raised several safety concerns. Sky Diving operations also had the most intrusive impact on Airport neighbours. Residents have rescued parachutists from nearby farmland and even roads. Users have rescued parachutists from hangers and structures within the airport. The increased air traffic and activities that the council are predicting in what is going to be a highly densified area is not well thought out and needs further planning and consultation with neighbouring residents before implementation and acceptance of this draft development plan.

Hanger Home Precinct.

Since December 2021 ECan have declined consents for the use of septic tanks and in the area near the Ashburton Airport. Hanger Homes will require individual separate septic and waste-water solutions for each hanger home and a potable water supply. Before the acceptance of the draft development a concept plan as with the Commercial Precinct showing placement of a traffic management and parking provisions for the proposed Hanger Homes Precinct from Morris Road.

Airport Authority Operational Changes

The regular breaching of CAA regulations is of major concern for the safety of local residents including the public using Seafield Road. Aircraft and their operators once in the air fall under CAA rules so complaints to Ashburton District Council are not able to be acted upon as. The disregard for safety that we have witnessed on numerous occasions is the reason why we do not support a sky diving operation at the Ashburton Airport as it endangers those using and living in the vicinity of the Airport on a daily basis.

The images and the flight trajectory (page 5) are of the Sky Diving plane show the flight path trajectory of the aircraft upon approach. This information was directed to a CAA Aviation Safety Advisor for explanation and education. The operators after a short compliance period resumed the unsafe flying practices, until covid eventually ceasing sky diving operations.

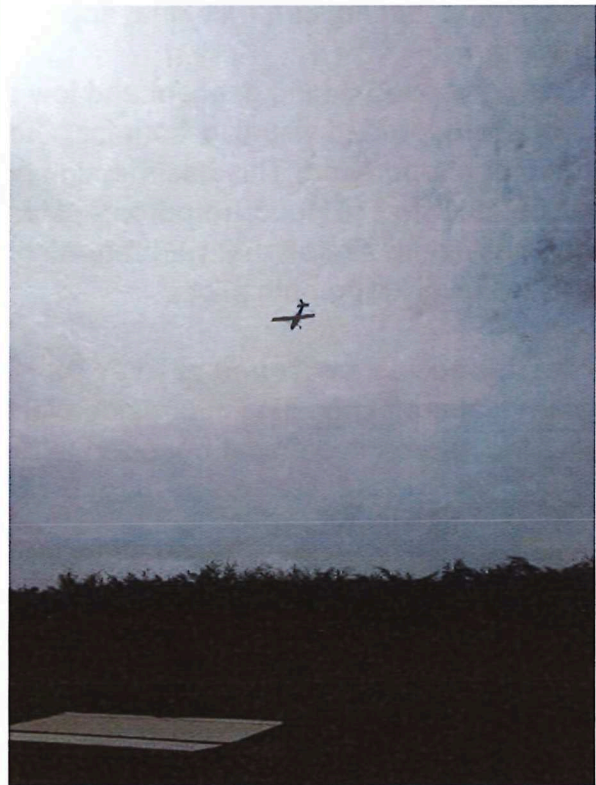
Upon review of the photos and other information supplied to CAA, the response was that by tracking the descent of the sky dive aircraft circa 400m from the threshold of RWY02 over residential property and the usual touch down point, they were able to

ascertain that final turn onto final approach for RWY02 is well below the 500ft minima.

The high-speed during descent and low altitude turn to line up on final approach the pilot has degraded visual lockout for other aircraft due to tilt of wing and close in manner of operation. This has the high potential of an in-air collision similar to the recent accident at Hood Aerodrome, Masterton in June 2019 where a private aircraft and parachute aircraft that was returning to land collided at a low-level mid-air above ground level killing both pilots.

Had this accident occurred at RWY 02 NZAS then there would be a high risk of one or both aircraft impacting into residential property below. It was only by good fortune that the approach path did not operate over residential areas at Masterton.





Flight School

We support the establishment of a Flight School at Ashburton Airport. This type of business will bring some financial benefit to the wider local economy in addition to the direct financial benefit of airport operations. To reduce the increased noise and lessen the impact on increased air traffic from this operation by implementation of a change to the current circuit direction for which the Ashburton District Council as the Airport Authority is authorised to do. The flight school when spoken to at the open day currently operate non-standard R/H circuits at Oamaru and had no issue with a change of circuit turn.

The Ashburton Airport Authority has the power to **amend** the current operating circuits which currently see aircraft circuiting standard hand turns on all runways. I proposed that non-standard right-hand circuits on Runways 02, 29 & 34 be implemented. This minimises the flight path over-populated, high density residential homes, and schools.

This circuit direction has the flight path taking aircraft out over adjacent farmland. This practice is common on many uncontrolled and controlled airports around NZ thus removing the risk of accident from increased aircraft traffic over residential areas and reduce noise to the greater number of people. The benefit to residents

would outweigh any resistance from current users who should be promoting safe flying practises. To do this now is timely to educate users and would align with the changes proposed by the ADC that wish to see increased air traffic from an airport they are responsible for.

Flight training and ratings for all pilots and aircraft type, include night flying. To manage the effects of airport activities on neighbouring residents, it is imperative the Airport Authority implement a caveat limitation on night flying activities, a caveat that night flying ceases at midnight and a restriction on the number of aircraft operating circuits per hour at night

We suggest two aircraft at any one time in the circuit be permitted for night training. Additional one-off flights to facilitate an arrival or departure may operate if they are not part of the circuit training.

Ashburton District Council should impose a limitation on the type of aircraft operated to those with allowed noise footprint. Modern training aircraft have a much lower noise footprint than this of years gone by. This could be done by imposing a maximum noise decibel limitation measured over the whole operation from take-off to landing.

Our concerns

1. The compatibility of safe operations by a flight school and sky diving business
2. The present grassed runways' ability to sustain the high levels of traffic activity in particular, sky diving.
3. Runway congestion with flight school training take-offs requiring an extended time per take-off and the number of combined flights by flight school, sky diving, recreational and other commercial users.
4. What provisions have been made for fuel storage and refuelling areas for the flight school.
5. The timeline provided on the page 24 of the Development Draft Plan for the Commercial Precinct doesn't allow for a fair consultation period and would suggest that the development of this precinct is a fait accompli.

Grass Runways

Of concern noted by previous submissions is the need for runway preservation. Provision made to prohibit tailwind take or landings to minimise runway wear. Considerable wear and tear from the continual use of the sky diving operation on a limited part of the runway surface caused major damage to the runway. The council

has stated in its draft development plan that users will be responsible for the upkeep and maintenance the runways. How does the council perceive that the airport users will have substantial reserves within a short time frame to cover that wear and tear that will be created by the increased flights projected at 45 per day by 2024 – 25 by the flight school and equivalent by the sky diving business.

General Questions:

1. How many entrances to hangers on the proposed Commercial Precinct site onto Seafield Road is the council planning. Given the present single hanger has developed its own entrance already.
2. How many parking spaces per commercial hanger must each commercial business provide that comply with other businesses in the Ashburton District plan.
3. What is the purpose and outcome of the Council's proposed revised of noise contours. What assurances can the Council give to Airport Neighbours that they can enforce these levels when this is outside the jurisdiction of the Airport Authority.
4. Will ECan be granting consents for Sewage and wastewater in the Northeast of Ashburton that included the Airport.
5. Is the council going to contribute to the development of new infrastructure to accommodate the expansion of commercial and residential buildings at the airport for wastewater and septic removal or is the ADC treating the development as a commercial proposition.
6. Will the council include residents in the surrounding areas in the reticulated infrastructure who are currently responsible for their own water and sewage.
7. Was the hanger on Seafield Road registered with the Council as an operating commercial building. If it was how was it allowed to operate with potable water, sewage and traffic management and parking.
8. What restrictions will be placed on hours of operation for the sky diving commercial operation, given that previous sky diving operated daily from daylight to dusk which had considerable impact on nearby residents' peace and enjoyment both in and outside of their homes. Notwithstanding the penetrating noise, the pilots flew regularly outside of CAA regulations upon on landings and take offs over residential homes for which the council was powerless to act on complaints. It is then misleading for the Ashburton District Council to state in the draft plan that there were little complaints.

9. Could the council please explain the justification of the financial costings provided in the draft development plan from the expected income and the expected number of flights from the Flight School for the Flight School's landing fees and aircraft licences which has been budgeted at \$14,400 per year, given the expected number of flights as provided at 42 per day, surmising they operate 6 days per week for a period of 48 weeks, the provided costings calculate then that the flight school will be paying \$1.00 per landing fee as opposed to a recreational user at \$10 per landing fee.

Surely this is contrary to the Ashburton District Councils vision, values and goals statement "to enable the airport to become more financially independent"