

2 December 2025

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Dear Simon,

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FTAA – 2503 -1039 Response to Minute 16 of the Expert Panel

This advice comprises a brief response to the comments from Marshall Day Acoustics (**MDA**) on behalf of Ardmore Airport, dated 10 November 2025 (the **MDA Comments**). This advice follows my response to the Comments from Invited Parties dated 9 October 2025 (the **Styles Group Response**) and the original *Assessment of Noise Effects* prepared by Styles Group dated 8 February 2025 (the **Styles Group Assessment**).

This advice uses the same heading numbers as the Styles Group Response and the MDA Comments.

2.1 Non-acoustical Factors

The MDA Comments confirm their view that reverse sensitivity and safety concerns are within their area of expertise.

In my experience, the assessment of reverse sensitivity effects can be informed by the advice of an acoustics expert, but ultimately the assessment is performed by a planner, lawyer or decision maker. I consider that the noise effects on people is a key factor, and that adverse effects may result in complaints about the noise. But the ultimate assessment of whether those complaints will result in a legitimate reverse sensitivity effect such as curtailing the lawfully established activities at Ardmore Airport is a broader judgement involving more than just acoustics.

The MDA Comments state that safety concerns are also within their expertise. I am not aware that MDA have any specialty in understanding how communities might fear for their safety where they are near to airports. The MDA comments state that safety concerns come from research. I accept this, but I am not clear on whether MDA have the expertise to translate research on community perceptions of safety to the situation at Sunfield.

The MDA Comments also mention the effectiveness of mitigation for outdoor spaces (third bullet in second list at s2.1). This may have been included in error. I have not suggested that assessing the effectiveness of mitigation for outdoor areas was a non-acoustical factor.

The MDA Comments do not respond to two other issues I raised as non-acoustic factors in the Styles Group Response – the benefits of Ardmore to future residents and the lifestyle preferences of future Sunfield residents. I expect that the absence of a response acknowledges my concerns.

2.3 Construction of new houses between the 55dB Ldn and 60dB Ldn contours

This section of the MDA Comments is somewhat unclear. The MDA Comments appear to agree with the Styles Group Assessment and the Styles Group Response, but then state some apparent disagreement.

I consider that the agreement and possible disagreement on this issue can be resolved with the following clarification:

The Styles Group Assessment and proposed Condition 142 make it clear that new houses in the Sunfield development will need to comply with all relevant parts of D24.6.2, including the need to reduce aircraft noise by 25dB. The houses will also be mechanically cooled and ventilated in accordance with AUP Standard E25.6.10. This means that residents can stay cool and comfortable inside without the need to open windows or doors for ventilation or fresh air. The outside to inside noise level reduction will therefore be 25dB at the very least, and more likely to be approximately 30dB for many houses.

This contrasts to a normal house built outside the 55dB L_{dn} contour. Residents in any other normal house do not need to be provided with mechanical cooling and a mechanical fresh air supply. This means that windows would need to be opened (probably only a small amount) for cooling and to remove contaminants such as moisture and carbon dioxide. Even slightly open windows will reduce the outside to inside noise reduction drastically. An inside to outside noise reduction of 15-17dB is generally the most that would be achieved with windows slightly open.

This means that the houses in Sunfield will be much quieter indoors than a hypothetical house that is not subject to the same conditions of consent but subject to the same noise levels.

2.5 Night flights at Ardmore

MDA state that non-scheduled and non-circuit training night flights at Ardmore “are not significant in number”. My understanding is that such flights are very infrequent. This is consistent with the explanation to Designation Condition 5 that I quote in the Styles Group Response.

Overall, I maintain my view that the very limited nighttime flights at Ardmore means that the published guidance on health effects and annoyance for communities near airports must be treated with caution as they are heavily influenced by the effects on people’s quality of sleep from regular nighttime flights.

2.6 Single event noise levels

I maintain my view that 60 ex-military jet departures per year is an uncommon occurrence in the context of the much greater number of aircraft movements that are permitted.

2.7 Use of WHO Guidelines and NZTA Research Report 727

I remain of my view that the findings in these two documents cannot be directly transferred to the situation at Ardmore as MDA have done. I consider that these documents publish findings based on the exposure of communities to aircraft noise in circumstances that are quite different to that proposed at Sunfield. The specific differences are set out in the Styles Group Response.

3.0 Conclusions

The MDA Comments state the concerns I raise in the Styles Group Response are “baseless”. I remain of the views set out in the Styles Group Assessment and the Styles Group Response. As set out in the Styles Group Response, I expect that the adverse effects at Sunfield will be somewhat less than what is described in the MDA Review.

Yours sincerely,



Jon Styles, MASNZ
Director and Principal