

8 September 2023

James Kirk

**Email:** [c/-fyi-request-23802-6d955c5a@requests.fyi.org.nz](mailto:c/-fyi-request-23802-6d955c5a@requests.fyi.org.nz)

Dear Mr Kirk,

**OFFICIAL INFORMATION ACT 1982 (OIA) – REQUEST FOR INFORMATION - CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED (CIAL)**

1. We write further to our email of 14 August 2023, acknowledging receipt of your email of 12 August 2023 (via the third party public platform [fyi.org.nz](http://fyi.org.nz)) in which you requested the following information pursuant to the OIA:

*“All research, data, analysis and expert evidence you have on file which shows*

- 1. That Central Otago residents are in support of a new airport at Tarras*
- 2. That Central Otago residents want a new international airport in the region*
- 3. That Christchurch ratepayers approve of CIAL’s proposed airport*
- 4. That the proposed airport makes economic sense*
- 5. That the proposed airport makes environmental sense”*

(the **Request**).

2. CIAL will provide you with the requested information where it is able. However, it is occasionally unable to release requested information if it would prejudice or disadvantage CIAL’s commercial activities or negotiations. Before we answer your specific query, it may be helpful to provide some context to this.
3. The OIA permits an organisation to refuse to release requested information it holds if the withholding of such information is necessary to enable the organisation to carry out its commercial activities or negotiations without prejudice or disadvantage (s 9(2)(i) and s9(2)(j) OIA) provided that such withholding is not outweighed in the circumstances by the public interest in making the specific information available. For example, while it may be in the public interest to understand that CIAL is investigating the feasibility of establishing an airport in Central Otago that does not mean CIAL must share every detail of its plans, analysis, work or negotiations within specific work streams.
4. As you may be aware, CIAL is a council-controlled trading organisation that has been specifically established to operate and manage its business as an independent commercial undertaking for the purposes of making a profit, and to follow generally accepted commercial practices and disciplines.

CIAL is not a public body collecting and spending public funds. It operates as a wholly commercial, standalone entity. Due to the size and scale of those activities it is one of only three major airports in New Zealand regulated under Part 4 of the Commerce Act 1986.

5. As an airport, CIAL has a further overriding obligation under the Airport Authorities Act 1966, and reinforced by the Civil Aviation Act 2023, to act as a commercial undertaking. It does so in a commercially competitive environment both domestically and internationally, where its competitors are not under corresponding disclosure requirements. The proposed Central Otago airport Project (the **Project**) is a complex commercial activity, acknowledged as being in competition with the interests of other airports within New Zealand.

*Limbs 1, 2 & 3 of your Request*

6. The Project is currently in the validation and planning phase. While CIAL is under no legal obligation to consult in relation to the Project or otherwise publicly engage at present, in order to assist public understanding of the context of the Project and CIAL's decisions, CIAL has committed to respectfully engaging with the community and proactively publishing information as it completes pieces of work. This has seen CIAL meet with a number of different individuals and entities, including specific representatives of community groups, business groups, businesses, and local authorities in relation to the Project.
7. In relation to limbs 1, 2 and 3 of your Request, CIAL has not undertaken any formal surveys or data gathering exercises to calculate or measure precise levels of support or approval among the community (whether among Central Otago residents or Christchurch ratepayers) for the Project. CIAL has, however, consistently acknowledged that there is a real diversity of opinion and range of perspectives among the community in relation to the Project - as noted on the "Engagement" page of the Project website (<https://www.centralotagoairport.co.nz/engagement>).

*Limbs 4 & 5 of your Request*

8. In relation to limbs 4 and 5 of your Request, it is difficult to identify the information you are requesting CIAL release given the subjectivity which might be associated with the language in this part of your Request. Further, as noted above, the Project remains in the validation and planning phase – this is a long-term project and work is continuing. However, we note that CIAL has published on the Project website, among other items, the following summary information and documents:
  - (a) a Preliminary Aeronautical Assessment dated September 2021 for the possible new airport which shows, among other things:
    - (i) two options for a single runway on the proposed site;
    - (ii) early analysis on weather conditions; and
    - (iii) an early understanding of noise impacts.
  - (b) A document titled "*Unlocking Potential: Central Otago's runway to a future-focussed airport*" dated August 2023 which provides general information on, among other items, the following work and analysis undertaken (which builds on the work of the Preliminary Aeronautical Assessment):
    - (i) a more detailed aeronautical analysis, including flight paths and a preferred runway alignment;
    - (ii) CIAL's developing understanding of the proposed site environment – including weather, water, landscape, land transport, and ecology – and climate impacts; and
    - (iii) analysis in relation to future passenger demand growth in Central Otago.
  - (c) information and videos to animate what a conceptual airport might look like in the local surroundings, and how noise might be experienced with aircraft using the airport; and

(d) information papers about noise, avifauna, climate, land transport, landscape, and tourism.

9. We trust we have answered your requests for information. If you require any further information or we have in some way misinterpreted your requests, please let us know.
10. You have the right to seek an investigation and review by the Ombudsman of the decisions contained in this letter. Information about how to contact the Ombudsman or make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Yours sincerely

**CIAL LEGAL TEAM**

Email: [legal@cial.co.nz](mailto:legal@cial.co.nz)