

21 October 2022

Airways Corporation of New Zealand
PO Box 53093
Auckland 2150

Auckland Airport Submission: Auckland Tower Replacement Project

1. We refer to the Airways Corporation of New Zealand (“**Airways**”), Auckland ATC Tower Replacement Consultation Document dated September 2022 (“**Consultation Document**”).
2. Thank you for affording Auckland International Airport Limited (“**Auckland Airport**”) the opportunity to provide feedback on the Consultation Document.
3. We respond to each of the three consultation questions as follows:

Q 1: Do you have any feedback on the Auckland ATC Tower replacement options outlined?

4. We have reviewed the three options that Airways has considered in the Consultation Document:
 - a. Replacement Conventional Tower
 - b. Hybrid Tower
 - c. Remote Digital Tower
5. We agree that these are the three leading options to consider and do not have any additional options that we believe should be considered as part of the consultation.
6. Subject to the right safety cases and agreement from the regulator, we have no objection to the leading option being the Hybrid Tower.
7. We are also very supportive of the parallel investigation of a Remote Digital Tower. With developments in technology, the increasing cost of building infrastructure as well as the constraints on space at the airport, it is the right thing to consider a Remote Digital Tower as an alternative. However, the lead principles to consider this option need to be the safe and efficient operation of the airspace and aerodrome and there will obviously need to be significant work undertaken with the Civil Aviation Authority in terms of the viability of this as a safe option.
8. We are committed as an organisation to support the development and review of safety cases for each option. Reference cases from other airports to inform the development of the digital alternative will be key.

Q 2: Do you have any feedback on Airways’ preferred approach for the replacement of the Auckland ATC Tower?

9. As stated above, we are supportive of the preferred approach for the replacement, on the basis that there is careful consideration of the safety case and that Airways works closely with the regulator and stakeholders in development and consideration of the options.



10. We take the opportunity to emphasise that Auckland Airport is a lifeline utility so that continuity of service needs to be a prime consideration for Airways when it is working through the process, as noted in the Consultation Document.
11. We would ask that more detail is provided in respect of the process for development of the options and how stakeholders, including Auckland Airport, will be included.
12. We are committed to working with Airways to identify suitable locations for future towers.
13. We note that the development and operation of a hybrid or digital tower will result in significant changes for Airways workforce. While the core duties of an air traffic controller will remain the same or similar in all options, the location and way that those duties are performed could change significantly (i.e. looking at a screen vs looking out a window in a tower). We would like to understand in more detail how Airways will manage this change with its workforce.

Q 3: Do you have any feedback on the changes highlighted to the Capital Plan in 5.1?

14. Auckland Airport has no comment on the changes to the Capital Plan.

Yours faithfully,