

21 October 2022

1. Auckland Airport Tower Replacement Consultation

1.1. Thank you for the opportunity to comment on the consultation document *Auckland ATC Tower Replacement* (September 2022). We have also participated in an online briefing and appreciate the additional information provided by email.

2. Replacement options

- 2.1. NZ Airports supports in principle the development of tower replacement options that enable Airways NZ to build its understanding and confidence in the use of digital ATM delivery platforms.
- 2.2. We see potential for digital towers (or a hybrid digital/traditional network) to provide benefits across a number of important outcomes including safety, efficiency, service flexibility and resilience, throughout the air transport network in the future. However, this must be subject to a high degree of confidence that a digital solution would be at least as safe as current services, and highly reliable and resilient, especially at New Zealand's international and busier regional airports. This project is therefore an important test-bed with wider strategic relevance.
- 2.3. We leave the detailed development and selection of options for the Auckland Tower replacement with Airways, Auckland Airport and users of the service.

3. Strategy development

- 3.1. We acknowledge that the current consultation is focussed on the Auckland Tower Replacement, which itself is subject to specific timing and airport campus development requirements. However the consultation document alludes to the Auckland project being an important building block in Airways' digital delivery strategy. We agree. In our view this is an important opportunity to build understanding and capability across the sector, and to test the ability of all the affected parties to mitigate risks arising from a shift to more reliance on digital platforms.
- 3.2. Ideally this process would have already been more advanced, and would have started in a less mission-critical context, as envisaged in the original Invercargill-based digital tower project. Like many aspects of aviation in the last three years, we understand that the COVID-related aviation downturn led to this project being discontinued. Nevertheless, we remain supportive in principle for an appropriately risk-managed pathway towards digital delivery options.
- 3.3. Airways' email of 20 October (GM Air Traffic Services) noted:

“This Auckland based work is a component of the future delivery strategy revamp. The strategy revamp will take into account, amongst other initiatives, the idea of digital hubs to provide flexibility and enhanced options for future tower replacements. It is expected that early next year we will have more structure around this aspect of our revamped strategy and we will be in a position to share with the industry at that time.”

- 3.4. We look forward to discussing the Airways delivery strategy early next year.