

6 December 2024

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### **Auckland Air Traffic Control Tower Replacement – 2024**

Air New Zealand appreciates this opportunity to submit on proposals for replacement of the air traffic control tower at Auckland Airport.

Air New Zealand wholeheartedly endorses the submission made by BARNZ on behalf of its member airlines and refers Airways to that submission as fully representative of Air New Zealand's views.

It is disappointing that, having consulted comprehensively in 2022 regarding the appropriate replacement platform at Auckland Airport, and concluded to proceed with a hybrid tower (with further review of a fully digital solution prior to construction commencing), we are now faced with reversion to a completely conventional solution. Air New Zealand stands by our 2022 position that a fully digital solution should be deployed at Auckland. It is untenable that Airways is essentially locking itself, and its airline customers, into a 20<sup>th</sup> century platform when we are more than two decades into the 21<sup>st</sup> century. And at a time where digital platforms are increasingly seen as the most effective solution for air traffic control, e.g. Western Sydney Airport will commence operations in 2026 with a fully digital solution rather than conventional tower. As per BARNZ's submission, Air New Zealand would welcome Airways' clarifying its position on Digital Aerodrome Services.

That this urgent solution is being pursued due to a failure in planning co-ordination between Airways and Auckland Airport is astounding. The impact of the new Pier A1 on sightlines from the existing tower (and existing contingency tower) should have been a consideration early in the design process (noting that the Pier A1 construction was originally intended to commence in 2020).

As noted by BARNZ, the cost impact of the proposed replacement tower cannot be considered in isolation. While the capital spend is proposed over 3 pricing periods, with the asset then entering the RAB in 2029, it is unclear what the overall price path looks like considering the totality of Airways' costs over those periods. The current cost environment is particularly challenging and, coupled with flat demand, looks to provide significant

headwinds to airlines over coming years. As such, it is imperative that Airways is rigorous in its approach to costing the replacement tower, and in managing the delivery of that facility.

BARNZ has highlighted that this is an aviation system issue which is currently poorly coordinated. Air New Zealand agrees. Better collaboration and oversight is required to ensure we are delivering a functioning system which meets the needs of New Zealanders, and visitors to New Zealand.

Yours sincerely

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