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**Submission: Auckland Air Traffic Control Tower Replacement Project**

We refer to the Airways Corporation of New Zealand (“Airways”), Auckland ATC Tower Replacement Consultation Document dated November 2024 (“Consultation Document”) and to the “Industry Consultation Clarification” dated 12 February 2025 (“Clarification Document”)

Thank you for affording Auckland International Airport Limited (“Auckland Airport”) the opportunity to provide additional feedback on the Auckland Air Traffic Control Tower Replacement Project and to participate in the workshop hosted by Airways on Monday, 17 February 2025.

As an initial comment, Auckland Airport notes the working relationship it has with Airways and the regular engagement between the organisations as part of the aeronautical system that operates at Auckland’s airport. As part of this regular engagement, including on day-to-day operations, repairs and maintenance activity, project design, safety and technical requirements, capacity, and construction methodology we work together to optimise the safe and efficient operation of the airport. By way of example, the construction methodology for Pier A1 has been tested through the Airways simulator. Necessarily, through this engagement, changes are made to take into account the feedback throughout testing. We look forward to continuing to work closely with Airways on all aspect of the operation of the Aerodrome at Auckland.

This submission should be read in conjunction with Auckland Airport’s original submission.

**Consideration of topics presented in the Clarification Document:**

**Preferred solution change:**

- The Clarification Document noted that the change in solution (from digital to physical tower) was driven by concerns including safety, capacity, and potential financial risks, rather than external influences like Pier A1. Auckland Airport acknowledges this clarification.
- Auckland Airport and Airways have worked closely together to identify possible site locations for a digital solution. The Clarification Document highlights that one of the two identified locations for the digital contingency tower would negatively impact safety and operational capacity. Auckland Airport supports the continued investigation of a digital ATC solution and will continue to work with Airways on identifying optimal digital mast locations.

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- Auckland Airport does not consider that site location or availability is a primary driver of not pursuing a digital solution.

### **Cost confidence**

The Clarification Document specified that the costs referred to in the Consultation Document are based on concept design (not finalised) and on information available from other completed Airways projects, such as the Wellington Airport Tower. The Clarification Document goes on to state that the cost provided considered a number of assumptions around site, access, and potential congestion due to other airport construction. These assumptions were not listed.

The construction cost breakdown provided in the Clarification Document does not detail how or whether the following costs have been considered:

- Temporary works (ground retention systems to form foundations).
- External services, and whether the assumption is that existing capacity supports the new facility. The breakdown does not specify if there is allowance for dual supplies to serve the existing tower while the new one is commissioned
- Preliminaries breakdown (e.g. tower crane inclusion, ground water management, airside landside boundary, off site storage, construction power, commissioning power, scaffolding, etc). A general estimate rule would be for this to be in the order of 25% of the physical works.
- Access and maintenance system.
- Other support facilities, including when and where they will be built and how they are factored in.
- Procurement or risk allocation.
- Traffic management and access to the site and roading network.

If the above costs have not been considered in the estimate, there could still be risk of understatement of costs.

Airways has been working closely with Auckland Airport on the construction methodology for Pier A1, providing valuable feedback. A similar exercise will need to be undertaken for any tower replacement. Auckland Airport continues to stress the importance of a constructability assessment as detailed in our original submission.

### **Pier A1 impact on provision of contingency**

The Clarification Document notes that the existing contingency tower for Airways (located within the Auckland Airport Apron Tower) will not be used as its contingency from 2026, when the construction of the new Pier A1 impacts the sightline. Auckland Airport confirms that Airways has selected a new location for the contingency tower, having worked through site requirements and potential locations with Auckland Airport.

If there are any questions in relation to Auckland Airport's submissions in response to the Consultation and Clarification Documents, Auckland Airport would appreciate the opportunity to address these with Airways.

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Auckland Airport will continue to work with Airways to ensure the best solution for the aviation system is identified.

Yours sincerely

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**Chief Strategic Planning Officer**

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