



AUCKLAND AIR TRAFFIC CONTROL TOWER REPLACEMENT AIRWAYS CONSULTATION – DECEMBER 2024

The Qantas Group welcomes the opportunity to provide feedback on Airways' revised option for the replacement of the current air traffic control (ATC) tower at Auckland Airport. There have been a number of developments since the 2022 consultation, and we appreciate the comprehensive information presented in the consultation document.

In the 2022 consultation, the Qantas Group supported a fully digital tower for the Auckland Tower replacement. At the time, Airways identified that extensive stakeholder engagement throughout the implementation process, leveraging experiences from other parts of the world, may mitigate the potential risk of the digital tower option. Airways subsequently confirmed its intention to proceed with its proposal to implement a hybrid digital tower at Auckland Airport, supported by a digital contingency tower.

It is therefore disappointing that the original planning process failed to identify Auckland Airport's 'new terminal pier (Pier A1) would impact visibility from both the Hybrid tower site and current contingency tower site', now requiring urgent replacement of the Auckland ATC Tower. The planning process to support an integrated terminal that was undertaken by Auckland Airport should have appropriately considered the impacts to ATC in the detailed design processes in accordance with the obligations of an aerodrome operator under New Zealand's Civil Aviation Rules.

The Qantas Group supports BARNZ's submission to the consultation that suggests open consultation between the participants in the aviation eco system, including border agencies, Airways, airlines and airports would improve decision making on airport development.

The Qantas Group's responses to the questions set out in the consultation paper are provided below.

1. *Do you have any feedback on whether the preferred option described in this paper is the right approach?*

While Airways' preferred approach is to construct a new approximately 45 metre conventional ATC tower, the Qantas Group maintains that a fully digital option would provide the appropriate service for air operators while future-proofing development at Auckland Airport.

The Qantas Group reiterates its 2022 position that the implementation of technology to utilise a digital service platform has been proven elsewhere in the world. London City and Changi Airport are already using this technology and Airservices Australia is planning to introduce Digital Aerodrome Service at Western Sydney Airport to be active from 2026.

2. *Based on the information provided, do you have any other feedback for the replacement of the tower?*

In response to the 2022 consultation, the digital tower was the most cost-effective solution when compared to the other two options and this remains the case.

The consultation document estimates that the cost of constructing a new physical tower is comparable to implementing a fully digital solution based on work conducted by Airways in conjunction with an external Quantity Surveyor.² Noting that these are initial costs based only on feasibility work, we request that Airways undertake further analysis and share any new assessments

¹ Auckland Air Traffic Control Tower Replacement November 2024, Airways NZ, p 18.

² Auckland Air Traffic Control Tower Replacement November 2024, Airways NZ, p 10.



with stakeholders, including inputs (with sufficient detail), assumptions, benchmark analysis and pricing recovery mechanisms. We request that this also includes disclosure on costs associated with the disposal of the asset when redevelopment is undertaken.