

**Before an Independent Hearing Panel and Freshwater Hearing Panel of
Greater Wellington Regional Council**

Under the Resource Management Act 1991

In the matter of Proposed Plan Change 1 to the Greater Wellington Natural Resources
Plan

**STATEMENT OF EVIDENCE OF JO LESTER ON BEHALF OF WELLINGTON
INTERNATIONAL AIRPORT LIMITED**

Hearing Stream 2

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1.0 INTRODUCTION

Qualifications and Experience

- 1.1 My name is Jo Lester. I hold a Bachelor of Resource and Environmental Planning (with Honours) from Massey University, obtained in 1995.
- 1.2 I am currently employed as the Airport Planning Manager at Wellington International Airport Limited (**WIAL**) that owns and is responsible for Wellington International Airport (**Wellington Airport** or **Airport**).
- 1.3 I have been employed by Wellington International Airport since 2019. My current role is Planning Manager, responsible for all resource management planning and consenting, noise, and compliance, in addition to monitoring the local, regional and central government legislative and regulatory environment for changes that many impact Wellington Airport operations.
- 1.4 A key focus of my employment for the last 5 years has been to lead the process of ensuring that the planning framework for Wellington Airport is flexible and enduring, befitting the regionally and nationally significant infrastructure status that it has. I was involved in the Environment Court mediation on the currently operative Natural Resources Plan throughout 2020.

Code of Conduct

- 1.5 I am giving evidence based on my experience and position. I accept however, that because I am employed by WIAL, my evidence may not be considered entirely impartial or independent.
- 1.6 Subject to that point, and while this is not an Environment Court hearing, I have read and otherwise complied with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023.

2.0 SCOPE OF EVIDENCE

- 2.1 The purpose of my evidence is to provide a broad overview of and introduction to the Airport, its role in the wider community and its regulatory setting in terms of the obligations under Civil Aviation regulations. In summary, my evidence outlines:
- The Airport's role as Regionally Significant Infrastructure (**RSI**)

- How the Airport's operation supports the wellbeing of the region and beyond, both economically, culturally and socially
- The importance of WIAL's role as a lifeline utility operator
- WIAL's plans to meet future travel demand including the Airport's 2040 Masterplan as informed by forecasting.

2.2 WIAL will provide more detailed evidence at later hearings particularly HS 3 in relation to earthworks, and HS4 in relation to stormwater and how these new rule (as interpreted by the Council) have unnecessarily hindered the ongoing operation, maintenance and upgrade of the Airport and how the provisions in totality may continue to do so unless amendments are made.

3.0 IMPORTANCE OF AIRPORT AND AVIATION TO WELLINGTON

Regionally Significant Infrastructure

3.1 Wellington International Airport Limited (**WIAL**) is the owner and operator of the Wellington International Airport (**Wellington Airport or the Airport**) located in the suburb of Rongotai in Wellington. Wellington International Airport is an important existing strategic asset to Wellington City and surrounding regions. As I outline in more detail below, it provides an important national and international transport link for the local, regional and international community and has a major influence on the regional economy. The Airport is a fundamental part of the social and economic wellbeing of the community.

3.2 As such Wellington Airport is recognised as regionally significant infrastructure (**RSI**) in the Greater Wellington Regional Policy Statement. This RSI status should continue to be recognised in lower order planning frameworks to ensure the ongoing operation, development, and growth of such infrastructure is provided for without undue regulatory barriers.

Facilitator of Economic Growth

3.3 Wellington Airport connects people and goods around New Zealand and the world, making a vital contribution to economic growth. It is the primary arrival and departure port for many visitors to the region and central New Zealand.

3.4 It fulfils a critical role as essential transport infrastructure for the city, region and country. In the most recent year (ended March 2024) 5.4 million travellers used the airport. This is expected to reach pre-Covid levels of over 6 million by the end of 2027.

- 3.5** Air travel is vital for Wellington’s connectivity, given it is the capital city and geographically isolated from other main centres (with Auckland at least eight hours drive and Christchurch separated by Cook Strait).
- 3.6** The resilience of Wellington’s air travel market is a strong indicator of the necessity of air travel to the lives of Wellington residents and its visitors. Domestic traffic volumes at the airport have already materially recovered to their pre-Covid levels and connectivity to the trans-Tasman network has been restored. While the pandemic interrupted the growth profile of the airport, WIAL’s analysis, evidence of the recovery and industry expertise indicates that this impact is temporary.
- 3.7** Wellington Airport makes a very substantial contribution to the Wellington region’s economy. An economic impact assessment (EIA) undertaken by Business and Economic Research Limited (BERL) in 2024 found that the airport generated economic spend of \$3.9 billion in the region, generating a total of \$2 billion in GDP and 14,500 jobs in the local economy.¹ The economic wellbeing enabled by Wellington Airport includes inbound tourism, business connectivity, improved productivity, and increased competition.
- 3.8** Pre-Covid growth projections indicated this would reach \$4.3 billion per year by 2040 and facilitating more than 22,500 jobs².
- 3.9** The ongoing operation and development of the Airport is therefore of significant importance to employment, growth and the economic wellbeing of the community, region and nation.

Social and cultural wellbeing

- 3.10** Wellington Airport is an important contributor to social and cultural wellbeing. In addition to supporting the employment of thousands of Wellingtonians, the Airport connects people with loved ones, events and cultures across the globe, and provides substantial support to the local and regional community.
- 3.11** The Airport is also a significant contributor to a broad range of community sponsorships and charitable organisations, including the Wellington Airport Regional Community Awards, World of Wearable Art Show, Visa Wellington on a Plate and Beervana, CubaDupa, Wellington Fringe Festival, Cystic Fibrosis New Zealand through its annual Christmas tree festival, and is also a “Wellington Family of five” sponsor of Predator Free Wellington to name but a few.

¹ BERL Economic Contribution of Wellington International Airport, October 2024

² Wellington Airport 2040 Masterplan

Lifeline Utility Operator

3.12 The airport is recognised as a lifeline utility in the Civil Defence and Emergency Management Act 2002 (**CDEM Act 2022**) and is a member of the Wellington Lifelines Group (**WeLG**). In the event of a significant earthquake or other hazard event, the Airport is recognised as potentially the only link between the city and the rest of the country given the vulnerability of the road and rail network and the potential for the port and harbour access to be affected by liquefaction.

3.13 The airport participates in national emergency exercises and is a key player in local civil defence planning with deep emergency response expertise and equipment enabling land and sea rescue activity in the Eastern suburbs, South Coast and Wellington Harbour.

4.0 OTHER REGULATORY CONSTRAINTS

4.1 WIAL's key role is to ensure that aircraft can operate safely when landing or departing the airport which involves statutory obligations under the following:

- Civil Aviation Act 2023³
- Civil Aviation Rules (CAR) – Part 139(Aerodromes Certification, Operation and Use)
- Civil Aviation Authority Advisory Circulars
- International Health Regulations 2005

4.2 Civil Aviation activity in New Zealand is governed by the Civil Aviation Act 2023/1990⁴ and Civil Aviation Rules which are administered by the Ministry of Transport and the Civil Aviation Authority (**CAA**) respectively.

4.3 CAR Part 139 (Aerodromes – Certification, Operation and Use) is the primary Rule Part that governs the regulatory requirements relating to the certification and operation of Airports serving scheduled aircraft traffic whether they be international or domestic scheduled services.

4.4 These aviation related obligations overlap in some areas with RMA matters and WIAL's role and obligations under the RMA.

4.5 One key example and central to WIAL's safety obligations is ensuring that the runway and associated areas are fit for purpose. This, as I will explain in more detail in later evidence, involves a great deal of maintenance, repairs and replacement of pavement and associated infrastructure

³ The Civil Aviation Act 20-23 comes into effect on 5 April 2025. Prior Act is the Civil Aviation Act 1990.

⁴ Civil Aviation Act 2023 comes into effect on 5 April 2025

such as runway approach lighting, that requires careful planning and construction activities as well as a need to respond quickly when urgent repairs are required.

- 4.6** Another relevant example to the PC1 hearings is that every CAA certified airport in New Zealand is required to have a wildlife management plan to address the hazards of wildlife, such as birds, on the runway. The CAA produces guidance material called CAA Advisory Circulars which provide guidance on standards, practices and procedures that have been found by the Director of the CAA to be an acceptable means of compliance with an associated rule, including AC 136-16 – Wildlife Hazard Management at an Aerodrome.
- 4.7** Bird strike is a significant risk that can have serious consequences for the operation of the Airport. Keeping birds away from the runway is critical for the safety of planes and passengers.
- 4.8** A recent example of where the presence of birds on a runway became an issue at an NZ Airport was last year, when Timaru Airport experienced a near miss with a flock of black-backed gulls, leading to the aircraft overshooting the runway, flight cancellations and the airport's temporary closure. Fortunately, there were no injuries or damage to the plane resulting from the aborted take-off.
- 4.9** Although most incidents are benign, Wellington has had its own disruptions caused by wildlife. In October 2022, a departing A320 ingested a black-backed gull into one of its engines shortly after take-off. Some of the fan blades of the engine were warped and damaged during the incident, causing the pilots of the aircraft to elect to return to Wellington. Upon the finding of the damage, the aircraft was removed from service while repairs took place, causing disruptions.
- 4.10** Accordingly, WIAL must take particular care in how stormwater from the Airport is dealt with to ensure that bird strike risk is properly managed and bird strike hazard is not increased. The CAA Advisory Circular 136-16 noted above includes a list of the types of activities that are considered a potential wildlife attractant. These include, but are not limited to: landscaping (vegetation), artificial and natural wetlands as well as any standing water and waterbodies.
- 4.11** Standing water is incompatible in the areas surrounding an international airport not only because it can attract birds, but it can also attract biological vectors i.e., mosquitoes. These are a public health/biosecurity risk (to our primary sector) under the International Health Regulations 2005 (which NZ is a signatory to). These regulations require that within a 400metre radius circle from international processing facilities that any mosquito/larval habitats (i.e. areas of standing water) are removed/eliminated.
- 4.12** Wellington Airport has five designated international points of entry (the 400 m radius around these are shown in **Figure 1** below). This includes areas of land beyond the airport boundaries

(i.e. over the Miramar Golf Course, the wastewater treatment plant and currently being constructed sludge minimisation facility, much of the mixed-use zone in Rongotai plus Rongotai College and surrounding residential areas).

4.13 Within these areas there are therefore limited options in terms of stormwater management and in particular green infrastructure (ie swales and detention basins can be problematic).



Figure 1: Vector Control Areas – Wellington Ports of Entry

5.0 RESPONDING TO POPULATION GROWTH, AIRPORT FORECASTING and MASTER PLANNING,

5.1 As an Airport Authority under the Civil Aviation Act, WIAL is also responsible for planning the development of the Airport to ensure that it can meet the needs of the population it serves.

- 5.2** Spatial land requirements for the majority of activities and facilities at the Airport are mainly non-discretionary (i.e. required by the relevant civil aviation rules and regulations). They need to be sized to provide the appropriate levels of services to the number of passengers, employees, visitors and vehicles concurrently on site or to comply with regulated safety requirements for the manoeuvring, parking and servicing of aircraft.
- 5.3** Wellington Airport is very much constrained by available land area, its geographic location and surrounding land use, and WIAL continuously works to determine how best to provide for future airport (and population) requirements. It is the most intensively and efficiently utilised airport site in Australasia.
- 5.4** WIAL, as the guardian of the Airport, is obliged to take a long-term approach and commit resources towards planning and protecting for the future of the Airport. Care must be taken to ensure decisions are carefully considered and trade-offs understood.
- 5.5** Master planning undertaken by WIAL is therefore undertaken in a considerably more comprehensive way than many other airports that have larger landholdings⁵.
- 5.6** The Airport is approaching its ultimate throughput capacity within its existing site. There are no substantial areas of Wellington Airport land that are not currently developed or are not allocated for development as part of the Airports Masterplan. The Airport has capacity issues of in the northern part of the terminal (international) area in particular – demand will soon outstrip available land – compounded by residential nature of northern-eastern boundary, and the location of the Airport’s aviation fuel Joint Underground Hydrant Installation (JUHI).
- 5.7** In order to understand its longer-term infrastructure requirements, and to input into its Master planning processes, Wellington Airport regularly commissions forecasting studies to consider future growth scenarios and associated requirements. A robust forecasting methodology matches the drivers of passenger growth, such as changes in population, economic activity/incomes, destination attractiveness, travel costs (e.g. airfares), behavioural changes and the impact of one-off events, with the anticipated change in aircraft supply and seat capacity.
- 5.8** This should also be seen within the context of various city and regional plans and other planning documents that are currently under development or review. For example, the Wellington Regional Growth Framework (July 2021) has been developed to look at how the Wellington-Horowhenua region can cater for up to 200,000 additional residents in 30 years’ time; a 43% increase over to June 2021 estimated population. Further, this Framework anticipates the

⁵ Wellington Airport services close to 6 million passengers per annum on just 110 hectares, compared to Christchurch Airport (with 6.25 million passengers on 750 hectares)

generation of an additional 100,000 jobs over the same timeframe. Other plans, such as the Wellington City Economic Wellbeing Strategy are consistent with facilitating the growth of population and employment within the Wellington City area.

- 5.9** Wellington Airport will need to change and expand to cater for the anticipated growth in population and employment and will be a key enabler to generate and provide for this growth.
- 5.10** Were the airport not able to cater for this growth in population, airfares would be expected to increase significantly to and from Wellington, with demand outstripping supply. This would result in a city and region comparatively expensive to travel to, reserving air travel for the privileged while creating large barriers for business and government.
- 5.11** Wellington Airports 2040 Masterplan⁶ sets out a blueprint for the airport's development, outlining the developments that are needed overtime to ensure that the airport can meet this growth in population and the associated growing demands from travellers.
- 5.12** I note that the 2040 Masterplan is underpinned by aviation forecast as outlined above detailing:
- (a) the aircraft types and air routes currently operating,
 - (b) the anticipated growth in passenger demand
 - (c) the aircraft types expected to be utilised to meet that demand, and
 - (d) the airport facilities required during peak times to accommodate the required aircraft movements over the planning period.
- 5.13** The forecasts, derived by leading industry forecasters Intervistas, with input from the carriers serving Wellington Airport, indicate that a gradual up-gauging of aircraft (airlines moving to larger aircraft) over the planning period should be provided for, specifically on high volume routes such as the route connecting Wellington with Auckland. This up-gauging is expected to result in widebody aircraft such as the Boeing 787 being required to service the main trunk domestic routes at peak times, 68 seat turbo-prop aircraft replacing 50 seat variants and so on. While Covid-19 has had a major impact since these forecasts were completed, Wellington Airport continues to expect growth in demand and up-gauging of aircraft going forward.
- 5.14** Accommodating larger aircraft types requires additional apron area for compliant aircraft parking and circulation. Wellington Airport has hosted scheduled services from widebody (Code E) aircraft in the past, but only at low frequency. The regular hosting of multiple Code E aircraft at peak times is a significant change in the way aircraft are managed on the ground at Wellington

⁶ https://www.wellingtonairport.co.nz/documents/3131/FINAL_Master_plan.pdf

Airport. Aircraft such as the Boeing 787 and Airbus 350 are classified as Code E aircraft, requiring larger parking spaces, wider taxiway separation and larger ground handling equipment.

- 5.15** The extent of additional apron space now required was not anticipated in the earlier 2030 Masterplan when it was published in 2010; at the time, traffic volumes were expected to utilise a higher proportion of Code C aircraft. Hosting the types and volumes of aircraft now expected will also require additional terminal space. This is a good reminder of how airports need to be flexible and adaptable to changing technologies.
- 5.16** Similarly, the introduction of next-generation low- or zero-emission aircraft will require flexibility and adaptation. For example, electric aircraft may be smaller and more numerous (conversely to up-gauging of larger aircraft), which also requires apron expansion and changes to terminal layout.
- 5.17** Some of the facilities required can take a matter of years to design, fund and build and they remain in place for 50 years or longer in many cases. In other cases, WIAL needs to be particularly agile in the way that it provides infrastructure, as aviation demands can change rapidly.
- 5.18** The Airport has significantly invested in upgrading its facilities and infrastructure over the past 10 years (approx. \$507 million in capital expenditure) and is looking to invest further to meet expected demand and increase its resilience. Maintenance of the airfield alone costs approximately \$4 million per year.
- 5.19** Wellington Airport is currently reviewing its capital expenditure plans to determine the next steps for major projects which include a new international terminal, expanded apron space, and as well as the renewal of the southern seawall, which is reaching the end of design life, under-designed by today's standards which requiring frequent maintenance and is mostly beyond the boundaries of the Airport's designation.
- 5.20** Given the above WIAL will require flexibility and agility in planning for and constructing future airport facilities and infrastructure. With this in mind, WIAL recently obtained designations over its existing site, and proposed expansion site to the East, to enable the efficient and ongoing development of the Airport in line with the Masterplan, and these have now been confirmed in the District Plan.
- 5.21** WIAL has also been involved in the Wellington District Plan review process to ensure that the Plan's provisions are complementary to its Designations and to protect the airport from reverse sensitivity effects.

6.0 CONCLUSION

- 6.1** It is critical that the Airport as an essential regionally and nationally significant asset is appropriately recognised and provided for by PC1 including at an objective and policy level which will in turn inform the associated rules and methods.
- 6.2** WIAL's submissions seek to ensure that the Airport is not unnecessarily impacted by regional planning provisions that could undermine its ongoing operation and upgrade, limit safe and efficient aircraft operations or pose challenges for appropriate airport capacity expansion or replacement of coastal assets and other necessary development that are already enabled by the Airport's designations.