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

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

Hearing Stream 3

5 May 2025

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1.0 INTRODUCTION

Qualifications and Experience

1.1 My name is Jo Lester. I am the Airport Planning Manager at Wellington International Airport Limited (WIAL) that owns and is responsible for Wellington International Airport (Wellington Airport or Airport).

1.2 I appeared before the Hearing Panel with respect to Hearing Stream 2 of the Proposed Natural Resources Plan Change 1. I set out my qualifications and principal role at Wellington Airport and experience in my previous evidence. I do not repeat that here.

Code of Conduct

1.3 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.

1.4 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 statement of evidence relates to Hearing Stream 3, specifically in relation to the proposed Earthworks provisions of the Greater Wellington Natural Resources Plan Change 1 (NRP PC1). The purpose of my evidence is to provide context and background information to support Ms O'Sullivans evidence. It outlines:

- The significant issues and consequences that have arisen for WIAL as a direct result of the new earthworks provisions and their implementation including:
    - Earthworks definition (inclusive of pavement works)
    - Winter works provisions
- Background information about the maintenance, upgrade and development of the Airport in the context of the NRP PC1.

2.2 My evidence in Hearing Stream 2 outlined the importance of Wellington Airport to the wellbeing of Wellington both socially and economically and outlines its Master planning process. This evidence is attached as Appendix B to this evidence for ease of reference.

3.0 PLAN CHANGE 1 – IMMEDIATE EFFECT

3.1 WIAL was actively involved in the promulgation of the operative Natural Resources Plan, which was only made operative in 2023. This included participating in mediation over a considerable period of time where earthworks and stormwater provisions were canvassed at length and resolution reached via mediation agreement. Given the work and collaboration between a range of parties, it is fair to say that WIAL was disappointed by the Council's decision to relitigate these provisions within such a short timeframe of the NRP being made operative especially given the cost and time invested by all parties involved and without any consultation with affected parties (ie those parties involved in the NRP mediation process).

3.2 I understand that PC1 was proposed due to Whaitua recommendations and new national direction for freshwater management. The provisions proposed however go far beyond freshwater matters, and as the provisions have had immediate effect, they have already adversely affected the operation of the Airport, which I note is nowhere near any freshwater body.

3.3 To put this into perspective, WIAL must undertake regular maintenance and repair of its roads, runways, taxiways and aprons[1] to ensure their safety and functionality is maintained (ultimately so aircraft can operate safely and efficiently). Such maintenance has been caught up in the new PC1 framework which has imposed an inefficient and unnecessary consenting burden for routine activities that form part of the Airport's ongoing operational requirements. This has significantly affected WIAL's ability to undertake this work in a timely and cost-efficient manner and has the potential for WIAL to be unable to meet its statutory obligations and in turn the ongoing needs of the community. I explain this in more detail below.

[1] Refer to Appendix A for explanation of these terms

4.0 SUMMARY OF EARTHWORKS PROVISIONS OF MOST CONCERN

4.1 In relation to earthworks, the two provisions that have had the most effect are the alteration to the Earthworks definition so that it no longer has any exclusions for regionally significant infrastructure as per the mediated and operative definition via NRP in 2023 and the new winter works non-complying activity framework.

4.2 While I note that the s42A reporting officer's recommendations have accounted for a number of the submission points made by WIAL and other submitters in relation to these matters, I would still like to outline the costs (time and money) imposed on WIAL as a result of these new provisions so that the Panel is fully aware of WIAL's concerns and why Ms O'Sullivan's recommended further amendments are necessary.

4.3 There is also one other matter of concern to WIAL which relates to the permitted activity condition that requires earthworks to not be within 5 metres of the CMA. WIAL is responsible for the seawalls at the southern and western end of the runway which require ongoing maintenance including urgent maintenance after storms. Under the Operative Plan these works were permitted activities but that may no longer be the case in every instance.

4.4 Before providing more detail about WIAL's reasons for its concerns it is perhaps important to provide some context about the Airport and its operations, in particular infrastructure development and maintenance.

5.0 AIRPORT INFRASTRUCTURE DEVELOPMENT AND MAINTENANCE

5.1 Airports take a very long time to build and are costly to maintain. They have specific location requirements to be safe for flight operations and to be accessible to the communities they serve. Once built, they have a very long, intergenerational lifespan.

5.2 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.

5.3 There are a number of different factors which can lead WIAL to undertake construction projects (including repair/maintenance and upgrade) within its current landholdings and the surrounding area including the CMA:

Degradation of Existing Infrastructure

5.4 Existing infrastructure at the Airport is monitored through routine inspections (as outlined in more detail in paragraph 9.13 below) that assess deterioration where engineers base their recommended work date on expected usable life remaining. An example of this is seawall project.

Change of Operating Conditions

5.5 WIAL might need to change its operating areas meaning that some areas of existing pavement need to be used in ways which it was not originally designed for, thereby requiring reconstruction. An example might be heavier aircraft needing stronger pavement, or new taxiways/stands.

Optimisation of Existing Asset

5.6 As part of a reconstruction project WIAL may take the opportunity to improve the asset. For example, the Taxiway Bravo reconstruction project where the old pavement needed a structural upgrade to handle bigger aircraft, but through that process WIAL also installed new stormwater infrastructure and lighting ducts as a part of the asset improvement.

Compliance with ICAO and CAA Requirements

5.7 Compliance with ICAO[2]/CAA[3] requirements. WIAL is cognisant that the CAA may endeavour to resolve and remove some of the differences between the actual airport configuration and ICAO/CAA prescriptions, moving in the direction of increasing international compliance with ICAO.

[2] International Civil Aviation Organisation

[3] Civil Aviation Authority of New Zealand

5.8 Accordingly, WIAL strives to comply with or protect for future compliance with ICAO requirements when considering any project.

6.0 WELLINGTON AIRPORT LAND AVAILABILITY CONSTRAINTS

6.1 Due to the constrained size of the Airport as well as its location with the CMA at either end of the runway, efficient use of space within the airport site is important. Spatial land requirements for the majority of activities and facilities at the airport are mainly non-discretionary (ie 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 or aircraft. The airport is required to cater for:

- Infrastructure for the movement, parking and servicing of the expected practical maximum concurrent number of aircraft;
- Terminal facilities for the processing, dwell time and catering for the expected practical maximum concurrent number of passengers, friends, employees;
- Infrastructure to support and service the entire airport campus, such as energy generation and distribution, water supply and drainage, data and communication utilities;
- Related facilities such as car parking, vehicle pick-up and drop-off, road access, catering, rescue and fire-fighting, airport maintenance and operations, etc.; and
- Air traffic control and navigational aids for the safe and efficient operations of aircraft approaching and departing from the airport.

7.0 OVERVIEW OF CONSTRUCTION MANAGEMENT AT WELLINGTON AIRPORT AND "FOD"

7.1 The Airport's key role is to ensure that aircraft can operate safely when landing or departing the airport and it has other statutory obligations under the following:

- Civil Aviation Act 1990
- Civil Aviation Rules – Part 139
- NZ Civil Aviation Authority (CAA) Advisory Circulars (AC)
- CAA AC 139-5 Operational Safety during works on aerodromes

- CAA AC 139-6: Aerodrome design, aeroplanes above 5700 kg MCTOW[4]
- CAA AC 139-7 Aerodrome design, aeroplanes at or below 5700 kg MCTOW

7.2 The ability to undertake repair and maintenance or to upgrade and redevelop its infrastructure to ensure that aircraft can operate safely when using the airport, and to meet all of its statutory obligations is of paramount importance.

7.3 The Airport does not undertake any earthworks and construction activities lightly. Construction activities within and around the airport can be hazardous to the airport and aircraft operations and is therefore highly regulated.

7.4 Construction is a messy process that naturally produces a variety of debris such as gravel, asphalt chunks, stray pieces of hardware, fasteners, wood, dropped tools, materials drift, personal items, and small rocks embedded in vehicle tyres, or smaller particles such as dust and dirt.

7.5 In the aviation industry, this debris is known as Foreign Object Debris or FOD which refers to any object, live or not, located in an inappropriate location within the airport environment that has the potential to injure personnel or damage aircraft. Airports are required to have FOD management programs in place to comply with aviation safety regulations. These programs involve regular inspections, and cleaning to minimise the presence of FOD.

7.6 FOD pose a significant risk to the safety of aircraft operations. Even small dust particles can cause substantial damage if ingested into an aircraft engine. This can lead to accidents or incidents that endanger passengers and crew.

7.7 FOD can also cause delays and disruptions. For example, if an aircraft is damaged by FOD, it may need to be taken out of service for repairs, leading to flight delays and cancellations.

7.8 The financial impact of FOD is considerable. Repairing damage caused by FOD can be expensive, and the costs associated with delays and cancellations can add up quickly. For example, a piece of loose hardware that migrates from a job site onto a runway

[4] Maximum Certified Take-Off Weight (ie the maximum weight at which an aircraft is allowed to take off as certified by the CAA.

might blow a tire during take-off operations, resulting in a damaged aircraft and, quite possibly, injuries to passengers and crew. Dust or other particulate matter that can impact pilot visibility. Dust and sediment can be particularly problematic because they can be ingested into aircraft engines, leading to potential damage or reduced performance.

7.9 FOD avoidance is therefore critical and a condition of work on an airport. Contractors must maintain any construction site in an immaculate condition i.e. it must be kept clean and clear of debris at all times during and after a work shift. All sand, aggregates, soil or other materials must be kept wetted, confined, covered or contained to prevent materials from being blown or washed onto runway and taxiway areas.

7.10 On the completion of a shift, the whole area affected is required to be vacuum swept by the contractor to ensure that all loose particles, debris etc are removed leaving the area completely clean for immediate use by the airport between construction periods.

7.11 This effectively means if there is a sedimentation issue from any airport related construction activities, there will be a bigger safety issue for the airport operations as a whole. Therefore, sediment control of is of paramount importance at the airport.

8.0 WIAL's CONCERNS - EARTHWORKS DEFINITION EXCLUSIONS AND PERMITTED ACTIVITY STATUS/ CONDITIONS

8.1 I note that the new Earthworks definition replaced the former definition as required by the NZ Planning Standards, however there was no discussion in the Council's s32 analysis about the effect of removing the exceptions to the previous Earthworks definition, and no additional provisions (such as permitted activity rules/standards) were even considered to replace these exceptions.

8.2 The s42A reporting officer has proposed a new permitted activity rule to rectify this (as a result of the submissions received), however as outlined in Ms O'Sullivan's evidence, there is still some further refinements required.

8.3 The reason why these provisions are so much of an issue for the Airport relates to the fact that the earthworks permitted activity rule (WH.R23) condition only allows up to 3,000m^2 of earthworks per property over any consecutive 12-month period.

8.4 When work construction started in 2023 for the Wellington City Council Sludge Minimisation Facility at the Moa Point Wastewater Treatment Plant, it required a laydown area adjacent to its construction site. This was facilitated through the removal of a hillock which was on adjacent Airport land, the area of which exceeded 3,000m^2 (it was 9,000m^2) and will ultimately be used for Airport purposes.

8.5 As a result, and since then, the Council has required WIAL to obtain an earthworks consent for any project which involved any soil disturbance, no matter how big or small because, because the 3,000m^2 area condition threshold has been reached. This in turn has meant that the winter works non-complying activity provision has also applied when works were to be undertaken within this period.

8.6 Given the Airport's ongoing civil maintenance programme (outlined in more detail below), it is very unlikely that WIAL would ever be able to meet this condition with the result that resource consents would continue to be required for each work involving earthworks regardless of scale or urgency.

8.7 I should emphasise that WIAL does not take issue with having to apply for consents for larger construction projects, however having to do this for small works such as the replacement of light poles etc, is not only inefficient, but it adds extra time and cost and risk.

8.8 In addition to this, because the Airport needs to be able to undertake these works all year around to ensure that aircraft can operate safely and efficiently, as soon as this work needs to be undertaken between the months of 1 June and 30 September, even for the smallest amount of earthworks, WIAL has been required to lodge a resource consent for a non-complying activity with an avoid policy which is a major risk and in my view unnecessary.

8.9 I note that in relation to the winter shutdown provisions, there was also no discussion in the s32 analysis on the effect of including this rule framework in relation to small or large scale infrastructure projects. It has effectively put at risk any work during a major part of the year even if there is little to no sedimentation risk.

8.10 As I have outlined above, due to operational constraints earthworks at the Airport have to be carefully managed which translates to very little risk in terms of sedimentation from projects within the existing Airport campus.

8.11 In relation to larger projects, this winter shutdown timeframe adds significant risk, cost and time to infrastructure projects undertaken by WIAL and likely other infrastructure providers. The programme uncertainty that it causes makes it very difficult to plan exactly what stage of a major project is going to be at and when. It also fails to recognise that some earthworks activities must avoid certain breeding, spawning or nesting periods if indigenous fauna are located on site. When such constraints are combined with the policy directive *to avoid* the period of 1 June to 30 September, projects may become entirely unworkable.

8.12 In terms of the permitted activity condition that requires earthworks to not be within 5 metres of the CMA this condition is particularly problematic for some seawall maintenance activities which until now have been permitted by the operative NRP. While some maintenance will not trigger the earthworks provisions as only the seawall structure is affected, some routine and more importantly storm related repairs will involve earthworks which need to be undertaken with urgency given the airport and community assets that are protected by the seawall.

8.13 Since the introduction of PC1 of the NRP, the Airport has had some experience of how the provisions in the Plan have had significant effect on the ongoing operation of the Airport including repair and maintenance and upgrade of the airfield, and the construction of new infrastructure as outlined above.

8.14 Some of these examples are outlined below as well as some proposed projects to provide some context for the proposed rules and Ms O'Sullivan's evidence.

9.0 RECENT AND PROPOSED PROJECTS AT WELLINGTON AIRPORT IN CONTEXT OF PC1

Southern Seawall Renewal project

9.1 The western seawall and southern seawall situated between the breakwater in Lyall Bay and Moa Point beach, protect not only the Airport, but also Wellington City Council (WCC) infrastructure including Moa Point Road, the regional wastewater interceptor

pipeline and water supply reticulation (Wellington Water) from the Southern Ocean. These existing coastal defence seawalls were established over 50 years ago and although various extensions, frequent ongoing costly maintenance and upgrades have occurred over this time, WIAL's engineering advice has indicated that the area is subject to much larger waves than originally anticipated in the design of the existing structures. The airport is therefore proposing to renew the southern seawall. This work is essential to increase the Airport's (and the Community's) resilience and adaption to climate change, given that sea levels are rising, and the frequency and severity of storms is likely to increase.

9.2 In relation to issues posed by PC1 in relation to this project, the winter shutdown period would add undue programme risk to this project - taking into consideration both the winter shutdown period and the life cycle of Kororā[5], the only months that any earthworks could be undertaken for this nationally significance project is April and May (and this would also require calm weather/wave conditions during this time period).

9.3 This would mean, what would ordinarily be a 3-year construction project would take 15 or so years to construct. In these circumstances, the construction risks and resulting costs for a contractor would be so high that a construction company would have little interest if any in doing the work. Although this project will be considered under the Fast Track Consenting legislation, it would be unfortunate if this or other similar projects were frustrated by a policy and rule framework that effectively prohibits the upgrade of these seawalls, even though this work is critical.

Engineered Material Arresting System (EMAS) Project

9.4 The Airport has started the construction of new Engineered Material Arresting Systems (EMAS) at the northern and southern ends of its existing runway. This project involves changes to the configuration of the existing runway to install EMAS beds to enhance overall safety in the event of an aircraft overrunning the runway. The installation of EMAS beds results in changes to the runway end positions which requires revised paint markings and relocation of navigational infrastructure including the Precision Approach Path Indicator (PAPI) units and the glide path antennas to match the end

[5] Korora build nests during August, lay their eggs in September through to December, chicks and eggs are in the nests through to February, and March is moulting time.

position of the reconfigured runway. The EMAS works also require minor realignment of services.

9.5 WIAL was required to apply for resource consent for minor (in the context of the airport - 1500 m^2 area) earthworks (which were triggered because more than 3,000 m^2 of earthworks have been undertaken in the last 12 months as noted above) and also needing to undertake these works during the PC1 winter shutdown period. The discharge of stormwater from this project from a stormwater quality perspective was covered through the stormwater management plan provided by WIAL's existing site-wide stormwater discharge permit.

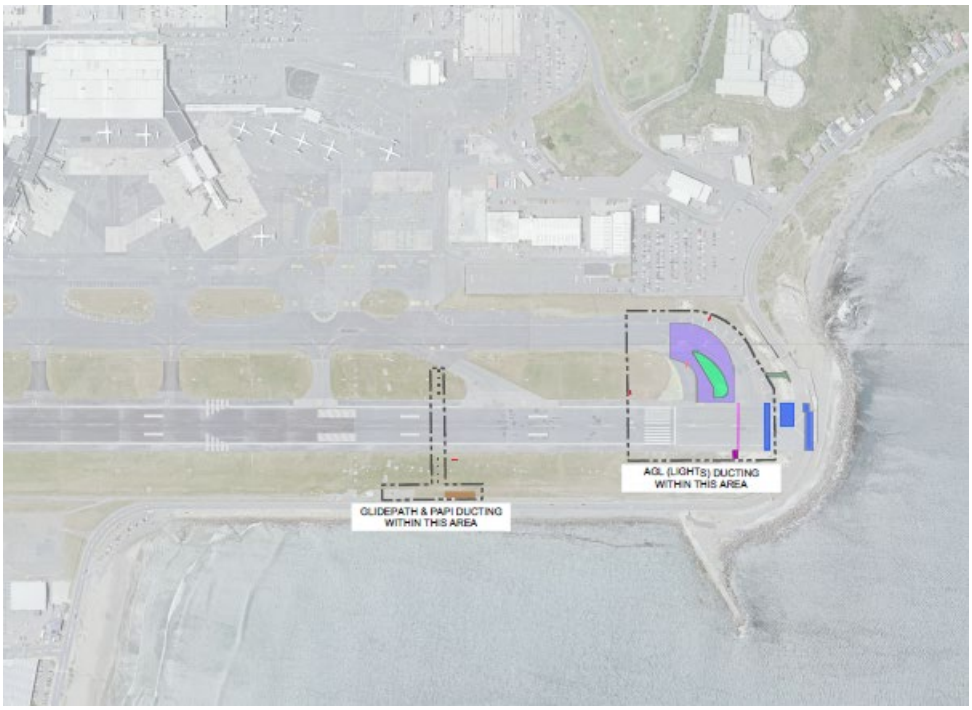

Figure 1: The minor areas of eartworks required for the EMAS shown green in plan above plus trenching for ducting to the gound ligting.

Removal of hillock

9.6 In July - September 2023 a hillock was removed from the southern end of Stewart Duff Drive, to initially be used as a laydown area for the Sludge Minimisation Facility (SMF) being constructed at the Moa Point wastewater treatment plant, but which will eventually free up 10,000 m^2 of land to be used for a new ground services equipment workshop and future airport apron. In order to enable the entire SMF treatment plant to be constructed within required timeframes, the hillock had to be removed during

the July – September period (winter shutdown period). Had this project been consented post PC1, it would have been extremely difficult for consent to be granted under the winter works framework (non-complying activity status with avoid policy framework).

Uncovered Carpark:

9.7 Work has recently been completed to construct a new uncovered carpark onto land previously acquired from Miramar Golf Club. Designed to initially accommodate the displacement of approximately 800 parking spaces due to several significant airport and regional infrastructure developments (current and proposed) including the WCC Sludge Minimisation Facility, the expansion of aircraft parking stands, the establishment of a new freight and logistics centre and the Metlink Kauri Street bus depot.,

9.8 During consenting for this project, WIAL applied for winter works as a non-complying activity consent for this project, but when reviewing the draft conditions of consent, even though the effects were considered as no more than minor, the consenting team added a condition of consent that earthworks shall be stabilised during the winter period unless a secondary approval was required – ie a winter works permit, requiring all of the same information that had already been provided in the resource consent application in the first place.

9.9 This was the process prior to PC1 change, but in my opinion, should have been discontinued when this rule came into effect (ie when the rule was notified). Council should not grant consent for a specific activity and then restrict it in this manner in the conditions. While WIAL's legal advice is that the condition is ultra vires the timing of this project did not allow for any further delays. In the end WIAL was finally allowed to undertake sediment and control works during this period, but not any of its bulk earthworks (even though the sediment control provisions were more than adequate).

Airport Fire Station:

9.10 Construction officially began in December 2023 on a state-of-the-art Airport Fire Station on Coutts Street in Rongotai. Moving the existing fire station across from the eastern side of the runway will create space for more aircraft stands, allowing for future

passenger growth and to accommodate electric aircraft which will be smaller and more numerous. This was consented prior to PC1 was notified. However had this project been consented post PC1, it would have been difficult for consent to be granted under the winter works framework (non-complying activity status with avoid policy framework).

BAU[6] Activities – Civil Maintenance Projects

9.11 The types of works undertaken at the airport that have been most affected by PC1 relates to the Airport's Civil Maintenance Programme.

9.12 To ensure the airport can operate safely and efficiently, WIAL must regularly undertake maintenance, and upgrade works within the Airport precinct, including:

- Pavement construction/reconstruction and resurfacing
- General maintenance works to the runway/taxiway infrastructure, which includes vertical structures and ground level (and below) works
- Capital work projects
- Airfield ground lighting installation and maintenance
- Work on the marine defence systems including seawalls and structures

9.13 WIAL's Civil Maintenance Program requires that the airfield is monitored/inspected daily/weekly/monthly and annually. These inspections prioritise what work needs to be undertaken:

- Daily: The runways and taxiways are driven over four times per day looking for FOD[7] and to confirm ongoing serviceability of the infrastructure and to look for any defects that have the potential to damage aircraft.

- Weekly: The pavement areas are also split into sections and walked over twice per week to further identify any defects which are escalated to WIAL's Manager of Airfield Maintenance to determine priority and urgency of repair.

[6] Business as Usual

[7] Foreign Object Debris

- Every two months WIAL has civil engineers on site to conduct pavement inspections to inform routine maintenance.

- Annually - WIAL also has a thorough annual inspection which takes several days with civil engineers, who provide detailed report on the entire pavement asset.

9.14 WIAL has gained extensive experience of undertaking the works identified as a result of this intensive Program. These works can include Scheduled and Unscheduled Works:

- Scheduled works include planned pavement upgrades to aircraft operating areas, pavements such as runway overlays and taxiway and apron resurfacing, upgrading building structures and internal access roads, or constructing new infrastructure including buildings.
- Unscheduled works will generally include non-critical maintenance and repairs of aircraft operating areas and other facilities within the airport boundary, but can include Emergency or Urgent Work:
    - Emergency work is required where the safe operation of the airport is compromised. Our contractors need to be able to mobilise to undertake whatever remedial work is required within four hours of receiving notice.
    - Urgent work is required when it is necessary of the work to be promptly attended to for the efficient operation of the airport where contractor needs be on site within 24 or 72 hours of receiving notice.
    - Routine work where work is required to be undertaken Within 2-4 weeks.

9.15 Most works on the airfield are required to be undertaken at night during the flight curfew when the airfield is not in use by aircraft. As noted above Airfield maintenance works may involve unscheduled (and emergency) works, which due to operational needs, may have to be undertaken at very short notice and at any time of the year.

9.16 Works can include localised repair of surfaces which can be typically undertaken in one shift, to the replacement of larger areas of pavement which may last a number of days or weeks depending on the scale of the works and the ability to schedule the works around aircraft operations. For most of these works, the contractors will need to undertake a cut, do what they can in the period available, and then temporarily repave in time for operations to restart the following morning (i.e. must be finalised by about

4:30am, for tidy up, site handover, inspection to ensure a safe return to aircraft operations).

9.17 Prior to the introduction of PC1, these works were permitted activities in the Natural Resources Plan as these repair and maintenance works were excluded from the definition of 'earthworks". Prior to the Natural Resources Plan, under the Greater Wellington Regional Soil Plan, these activities were also permitted. WIAL is very concerned that the position has changed without any evidence of adverse effects or consultation with WIAL

10.0 CONCLUSION

10.1 In summary, the PC1 earthworks provisions proposed have already had significant day to day implications for the Airport and WIAL. The new provisions, particularly the removal of exclusions for regionally significant infrastructure activities from the definition of earthworks and the introduction of a winter works non-complying activity framework, have already imposed substantial operational and financial burdens on WIAL. These changes have affected routine maintenance and urgent repair activities, which are critical for the safe and efficient operation of the airport.

10.2 My evidence highlights the adverse impacts of these provisions could have on WIAL's ongoing ability to meet its statutory obligations and maintain its infrastructure. The examples provided, including the future Southern Seawall Renewal project and the current Engineered Material Arresting System (EMAS) project, illustrate the practical challenges and risks associated with the proposed rules which have had immediate effect.

10.3 My evidence also underscores the need for further amendments to PC1 as detailed in Ms O'Sullivan's evidence to ensure that essential infrastructure maintenance can proceed without unnecessary delays and costs and that RSI development involving earthworks has an appropriate consenting pathway.

DATED at Wellington this 5th day of May 2025

APPENDIX A - Explanation of Airfield/Aerodrome Terms

Landside: Areas of the aerodrome which are not security controlled such as the main terminal, carparks etc. At Wellington Airport it refers tot that area of land between the red security long and yellow land boundary lines in the figure below.

Airside: the aircraft movement area of an aerodrome and its adjacent land and buildings or portions of this that are security controlled. This is the area 'inside' the red line in the figure below. The aircraft movement areas that are 'airside' are known as the Apron, Taxiways or Runways:

- Apron: A defined area on an aerodrome intended to accommodate aircraft for the purposes of loading or unloading passengers or cargo, refuelling, parking or maintenance. The area where aircraft park is called a stand, and the entrance to the terminal from the aircraft for passengers/crew is called a gate.
- Taxiway: A route along which an aircraft can taxi when moving to or from a runway. Similar to a road for aircraft that connects runways with aprons, hangars, terminals. The two primary taxiways at Wellington Airport run parallel to the runway (Taxiway Alpha runs alongside the length of the runway, and Taxiway Bravo runs parallel to Taxiway Alpha but closer to the apron area.
- Runway: defined rectangular area on a land aerodrome prepared for the landing and takeoff of aircraft.

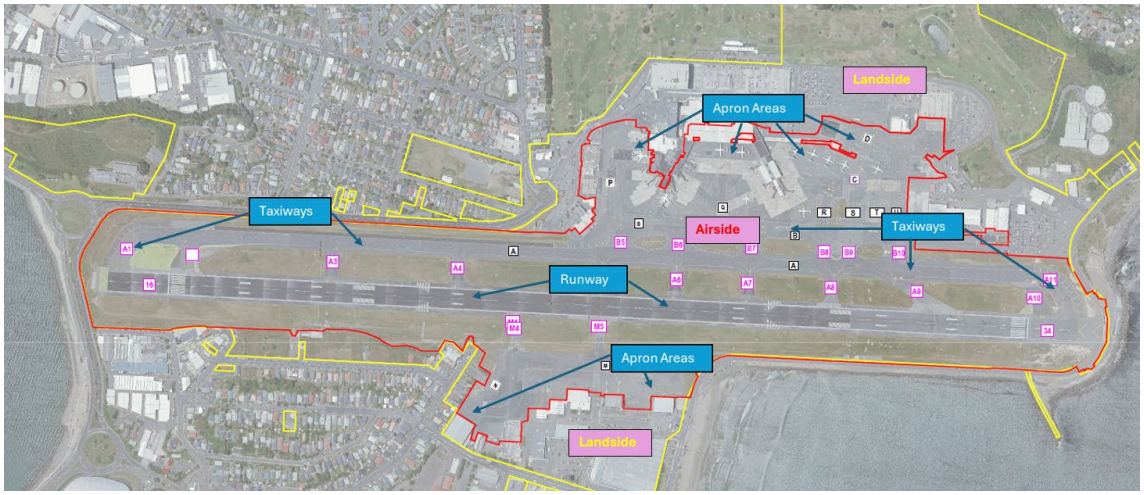

Figure 1 – Wellington Airport Aerodrome

APPENDIX B – Hearing Stream 2 Evidence

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

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

Hearing Stream 2

14 March 2025

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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 Reginal 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 jobs[2].

[1] BERL Economic Contribution of Wellington International Airport, October 2024

[2] Wellington Airport 2040 Masterplan

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.

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 2023[3]
- 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 2023/1990[4] 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 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.

[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

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 a 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 or 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 landholdings[5].

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.

[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

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 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 Masterplan[6] 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

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

(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 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.