

**BEFORE AN INDEPENDENT HEARINGS PANEL OF
WELLINGTON CITY COUNCIL**

IN THE MATTER

of the Resource
Management Act
1991 (the **Act**)

AND

IN THE MATTER

of hearing of
submissions and
further submissions
on the Proposed
District Wellington
City District Plan
(**PDP**)

**STATEMENT OF EVIDENCE OF
JENNA RAEBURN
FOR WELLINGTON INTERNATIONAL AIRPORT LIMITED**

DATED: 16 February 2023

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1. INTRODUCTION

Qualifications and Experience

1.1 My name is Jenna Raeburn.

1.2 I hold a Bachelor of Laws and Bachelor of Arts.

1.3 I have been employed by Wellington International Airport (WIAL) since 2018. My current role is General Manager Corporate Affairs, responsible for planning, resource management and sustainability.

2. SCOPE OF EVIDENCE

2.1 In preparing for the hearing, I have read the following:

- (a) WIAL's filed submissions and further submissions on the PDP.

2.2 My evidence sets the scene for WIAL's submissions that will be heard over a number of the hearing streams and includes discussion on:

- (a) how WIAL's operation supports the wellbeing of the region both economically and socially;
- (b) our plans to meet future travel demand including our 2040 Masterplan;
- (c) our designations which enable efficient and ongoing development in recognition of the airport's role as Regionally Significant Infrastructure;
- (d) the importance of District Plan provisions that enable the airport to appropriately manage growth and recognise the potential for reverse sensitivity effects from noise sensitive activities;
- (e) the importance of WIAL's role as a lifeline utility operator; and
- (f) our sustainability plans, including net zero emissions by 2030 and helping decarbonise aviation.

2.3 WIAL will provide more detailed evidence at later hearings as is appropriate to the individual topic being heard.

3. WELLINGTON AIRPORT CONTEXT

Facilitator of Economic Growth and Wellbeing

- 3.1** Wellington Airport connects people and goods around New Zealand and the world, making a vital contribution to wellbeing. It is the primary arrival and departure port for many visitors to the region.
- 3.2** It fulfils a critical role as essential transport infrastructure for the city, region and country. In the most recent year (ended March 2022) 3.5 million travellers used the airport, but this is expected to reach pre-Covid levels of over 6 million by 2025.
- 3.3** Air travel is vital for Wellington's connectivity, given it is the capital city and geographically isolated from other main centres (Auckland at least eight hours drive and Christchurch separated by Cook Strait).
- 3.4** 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. The pandemic has interrupted the growth profile of the airport, but WIAL's analysis, evidence of the recovery and industry expertise indicates that this impact is temporary.
- 3.5** 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) as part of the 2040 Master planning found that in 2018 the airport generated economic output of \$2.3 billion and close to 11,000 jobs in the local economy.¹ The economic wellbeing enabled by Wellington Airport includes inbound tourism, business connectivity, improved productivity, and increased competition.
- 3.6** Pre-Covid growth projections indicated this would double to \$4.3 billion per year by 2040 and facilitating more than 22,500 jobs.²

¹ Wellington Airport Annual Review, 2020.

² Wellington Airport 2040 Masterplan.

- 3.7** The ongoing operation and development of the Airport is therefore of significant importance to employment, growth and the economic wellbeing of the community.

Lifeline Utility Operator

- 3.8** 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.
- 3.9** 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.

Significant Infrastructure Provider

- 3.10** WIAL is an Airport Authority, and as such must be operated or managed as a commercial undertaking (Section 4(3) of the Airport Authorities Act).
- 3.11** As an Airport Authority, WIAL is responsible for planning the development of the airport to ensure that it can meet the needs of the population it serves. It is well known that Wellington Airport operates on a constrained site and WIAL continuously works to determine how best to provide for future airport requirements.³
- 3.12** The airport is an intergenerational asset. 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.
- 3.13** The function of the airport should be seen within the context of various city and regional plans that are currently under development or review. The Wellington Regional Growth Framework (July 2021) is being

³ Wellington Airport operates on just 110 hectares, compared to Auckland Airport on 1500 hectares and Christchurch Airport on 750 hectares.

developed to look at how the Wellington-Horowhenua region can cater for up to 250,000 more residents in 30 years' time; a 43% increase over current (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. 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 this growth.

- 3.14** Were the airport not able to cater for this growth in population, we expect airfares to and from Wellington would increase significantly 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.

Social and cultural wellbeing

- 3.15** Wellington Airport is an important contributor to social and cultural wellbeing. In addition to supporting the employment of tens 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.
- 3.16** Prior to Covid-19, Wellington Airport invested around \$2.5 million per annum in the community through sponsorships, the Wellington Airport Regional Community Awards, and home acoustic mitigation. These programmes have been reduced during the pandemic but are being scaled back up as passenger numbers return to normal.
- 3.17** Key event sponsorships include World of Wearable Art, Wellington on a Plate and Beervana, CubaDupa, Wellington Fringe Festival, Te Papa exhibits and the New Zealand Festival of the Arts. The Airport also supports Wellington's art and culture, hospitality, sport and events through pop-up showcases of local artists and festivals, sponsored advertising, installations for exhibits, and by reflecting Wellington's film and creative industry and food and beverage offerings in the terminal.
- 3.18** The Airport supports a large number of charitable organisations through the Wellington Regional Community Awards, which are organised in

collaboration with the region's councils and recognise the work of volunteer groups in the areas of Arts and Culture, Education and Child/Youth Development, Health and Wellbeing, Heritage and Environment and Sport and Leisure. The Airport also sponsors Cystic Fibrosis New Zealand through its annual Christmas tree festival, supports the Life Flight Trust, and supports local community groups through donations and neighbourhood working bees.

- 3.19** As a result of the Airport designation proceedings through Environment Court mediation in 2022. The Airport agreed to establish a Community and Environment Fund for the benefit of the local community located near the airport (in particular within the 65 dB Air Noise Boundary and any new 60dB Ldn contour) for the purpose of education, promotion and advancement of community, and the mitigation of any adverse effects association with the operation of the airport and environmental interests⁴. WIAL is currently working with the mediation parties to set up the Trust to administer this fund.
- 3.20** The Airport's location close to the CBD is ideal for reducing travel time and land-based emissions, as well as supporting productivity and connectivity; however, Wellington Airport is conscious of its proximity to neighbours and its unusually constrained site. The Airport operates a Noise Management Committee comprised of resident representatives, airlines, air traffic control and other airport operators. This Committee oversees the management of noise at the Airport, and the Airport Noise Management Plan has recently been reviewed and submitted to WCC for certification.
- 3.21** WIAL also invests in noise mitigation (insulation and ventilation) for the existing homes nearest the airport. To date, this programme has spent more than \$10 million and supported 100 homeowners.
- 3.22** The Airport is unable to internalise the noise effects of aircraft operations within its land boundaries. Given that residential activity is a noise sensitive activity, it is not a compatible land use adjacent to an airport. Once such activities are established, noise complaints can have the potential to result in constraints on an airport's operation. Wellington

⁴ Condition 39 of the Main Site Area Designation (WIAL 4 in the WCC PDP and G5 in the Operative DP)

Airport is already subject to operational constraints through the imposition of a night-time curfew (and other noise conditions),

- 3.23** The most appropriate planning tool to manage and control the establishment of incompatible activities (such as intensified residential development) within the vicinity of existing airports is through District Plan provisions, which are recognised and provided for in the New Zealand Planning Standards as Noise Control Boundary Overlays. It is important that these noise control boundary overlays are considered as Qualifying Matters to ensure that the Council can make residential development less permissive than the limits set out in the National Policy Statement for Urban Development, so that more people are not exposed to aircraft noise and any adverse amenity effects related to this over time.
- 4.** It is also useful to note that the Noise Control Boundary Overlays in the PDP depict a point of compliance or a “maximum” level of aircraft noise that can be generated over time. It does not reflect the current level of aircraft noise that is generated at Wellington Airport.

THE WELLINGTON AIRPORT MASTERPLAN

- 4.1** 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.
- 4.2** Master planning is an important component of this approach. Accordingly, WIAL updated its 2010 Masterplan (known as 2030 Masterplan) during 2019 (the update being known as the 2040 Masterplan). Wellington Airport 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.
- 4.3** These designations recognise the Airport’s status as Significant Regional Infrastructure, and underpin future development.
- 4.4** The 2040 Masterplan included an aviation forecast 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.

4.5 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.

4.6 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.

4.7 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.

4.8 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. The 2040 Masterplan is a snapshot of the future, providing

guidance for airport growth, but any expansion will be staged in a way that takes account of developments as they occur.

4.9 Wellington Airport is currently reviewing its capital expenditure plans to determine the next steps for a new international terminal, expanded apron space, and seawall renewal (which is reaching the end of design life, and under-designed by today's standards, requiring frequent maintenance) and is mostly beyond the boundaries of the Airport's designation), among other major projects. The next five years of capital expenditure will be consulted on with airlines (as required by the Airport Authorities Act⁵) in 2023, and finalised in early 2024.

4.10 It is important to WIAL that District Plan provisions do not unnecessarily or inadvertently constrain the proper operation and development of the Airport and its seawall both now and in the future.

5. SUSTAINABILITY AND THE TRANSITION TO NET ZERO

Wellington Airport operational emissions

5.1 WIAL is strongly committed to playing our part in reducing emissions and improving our sustainability. We aim to reach net zero emissions for our own operations by 2030, involving substantial, permanent reductions and then offsetting remaining emissions. By 2050 we are aiming for absolute zero emissions (no carbon output at all).

5.2 Some of our milestones to achieving these goals include:

- (a) Achieving Level 2 Certification from the Airport Carbon Accreditation programme, which runs independent assessments of airports around the world. This recognises we have comprehensive emissions profile mapping and reductions in place.
- (b) Scoring highly against Environment, Social and Governance benchmarks (3rd in the world for participating airports) in an independent global assessment by GRESB.

⁵ Shortly to be replaced by the Civil Aviation Bill.

(c) Improving the energy efficiency of buildings and infrastructure.

(d) Progressively replacing our operational vehicle fleet with electric vehicles (with the exception of fire service vehicles), with a third completed so far.

5.3 Our next steps include replacing our gas boiler and further reducing operational emissions.

5.4 This progress so far and work underway should provide the panel with a very high degree of comfort that the ongoing provision of infrastructure at Wellington Airport is consistent with a net zero emissions future.

Airline emissions

5.5 While the transition of aircraft technology to lower emissions is out of our direct control, we are working hard to lead and support airlines in this vital work.

5.6 For example, we are leading a technical group with other New Zealand airports and airlines looking at the requirements to support electric flights, and we have partnered with electric aircraft manufacturer Heart Aerospace to support the development of their ES-30 aircraft. In November 2021 we hosted the first electric flight to cross Cook Strait.

5.7 We are also supporting the roll-out of sustainable aviation fuels (SAF), with a target of 2023-4 for the first SAF-powered commercial flights.

5.8 It is worth noting Air New Zealand's stated goal to reach net zero emissions in their operations by 2050, and of Sounds Air to be operating commercial electric flights before the end of the decade.

5.9 The Climate Change Commission recognises that aviation is essential to New Zealand's way of life and therefore provided for in all scenarios and pathways to meet New Zealand's 2030 and 2050 emissions targets.

5.10 Te Atakura – First to Zero (which is WCC's blueprint to make Wellington City a zero carbon capital (net zero emissions) by 2050) also identifies the critical role of the airport in a connected city. The WCC submission to the Climate Change Commission (aligned to the delivery of Te

Atakura) confirmed the importance of air travel for tourism, and our reliance on air travel to stay connected to each other.

- 5.11** The Commission has also recognised that technology advancement is expected to provide a range of meaningful solutions to reduce emissions from the aviation sector over the medium term. Along with the electrification of short-distance commercial flights and SAF, there has been further investment into more efficient next generation aircraft. This is a continuation of a long-term sector trend with aviation CO2 emissions today being 56% less per passenger kilometre than in 1990.
- 5.12** Given all of these industry-wide efforts, it is certain that aircraft technology will change over the next 20 years. This means that airports, including Wellington Airport, will need the flexibility to accommodate these changes.
- 5.13** It is important to Wellington's economic and social wellbeing that a "net zero emissions future" is not perceived as a future where aviation growth is restricted. As noted above, domestic aviation has grown significantly since the 1990s with no substantial growth in emissions due to changing aircraft types and greater efficiency.
- 5.14** More air travel in and out of Wellington could reduce global emissions, if direct flights replaced more indirect routes. For example, a direct connection from Wellington to South-east Asia or North America would remove the need for a connection through Auckland, reducing journey time and the significant fuel burn during take-off and landing procedures.
- 5.15** Simply limiting aviation would likely result in inequitably high prices for airfares. The better pathway to net zero emissions is to support the development of new technology and allow reasonable time for this to occur.

6. CONCLUSION

- 6.1** Wellington Airport is essential for the wellbeing of the region both economically and socially.
- 6.2** The Airport is a key emergency response facility and is recognised as Regionally Significant Infrastructure.

- 6.3** WIAL has undertaken extensive Master Planning exercises over many years so that it is in a position operationally to meet future travel demand in a way that appropriately mitigates effects on the surrounding environment.
- 6.4** Designations are now in place which enable the operation and expansion of the Airport, but resource consents will inevitably be required for activities beyond the boundaries of its designations or with respect to any non-airport activity.
- 6.5** Wellington Airport should be protected from incompatible land uses such as increased residential density in close proximity to the Airport.
- 6.6** WIAL is actively involved in reducing its operational emissions and improving its sustainability, including reaching net zero emissions by 2030 and supporting decarbonisation of the wider aviation sector.

Dated 16 February 2023

Jenna Raeburn

GM. Corporate Affairs