

**SUBMISSION ON DISCUSSION DOCUMENT
TESTING OUR THINKING - DEVELOPING AN ENDURING NATIONAL INFRASTRUCTURE PLAN**

10 December 2024

To the New Zealand Infrastructure Commission / Te Waihanga

Summary

1. Auckland Airport is the owner and operator of New Zealand's largest and busiest airport. Auckland Airport is an integral part of the New Zealand and international air transport system, and is a strategic infrastructure asset of critical local, regional, and national importance. As the primary gateway to New Zealand, Auckland Airport is a significant contributor to the regional and national economy.
2. Auckland Airport supports the development of a National Infrastructure Plan to help develop a shared, long-term view of infrastructure priorities and ensure infrastructure is delivered in the right place, at the right time. Notwithstanding support for the intent of the National Infrastructure Plan, specific recognition for airports is required.
3. In particular, Auckland Airport considers specific recognition of the following is required:
 - (a) airports are significant infrastructure assets of local, regional, and national importance;
 - (b) integration of air and land transport is crucial; and
 - (c) reverse sensitivity effects on existing significant infrastructure must be appropriately managed.
4. Auckland Airport believes the National Infrastructure Plan should address these matters to better support a cohesive, future-focused infrastructure network that meets New Zealand's long-term needs.

Recognition and integration of Airport infrastructure

5. Airports are strategic infrastructure assets of local, regional, and national importance and play a crucial role in enabling rapid transport across New Zealand. Although the Discussion Document recognises the importance of the transport sector, the focus is almost exclusively on land transport. Coordinated infrastructure planning cannot be achieved without recognition of airports and the significant role air transport plays in an integrated transport network.
6. The National Infrastructure Plan must also ensure that land transport (and other infrastructure) is appropriately integrated with airports to provide for a cohesive and efficient national system. This will be crucial to achieve the intent, as set out in the Discussion Document, of a systems-approach to infrastructure delivery.

7. Airports are not standalone assets - they are deeply interconnected with transport networks and other infrastructure sectors. Auckland Airport is a critical link in respect of regional and international travel and is a road controlling authority for much of the wider Airport Precinct. These roads are a crucial section of Auckland's roading network. The Airport to Botany Rapid Transit Project is a key example of a project that will need to be carefully planned, staged and coordinated to ensure alignment with the Airport's future roading upgrades and to ensure the operational needs of Auckland Airport are met.

Relief sought

8. Airports must be recognised as significant infrastructure of local, regional and national importance within the National Infrastructure Plan. The integration of air and land transport, alongside other infrastructure, must be a core consideration in planning and investment decisions to ensure the National Infrastructure Plan can deliver a cohesive, future-focused infrastructure network for New Zealand.

Protection of existing infrastructure

Reverse sensitivity effects

9. Incompatible activities that establish or intensify in proximity to large-scale infrastructure, such as airports, have the potential to give rise to reverse sensitivity effects, which can lead to constraints being placed on that infrastructure.
10. In the context of Auckland Airport, reverse sensitivity effects can arise when activities that are sensitive to aircraft noise are introduced or intensified in proximity to the Airport's lawfully established activities. Establishing or intensifying activities sensitive to aircraft noise in areas exposed to elevated levels of aircraft noise (i.e within Auckland Airport's aircraft noise contours) results in adverse health and amenity effects on people living in these environments and residents becoming annoyed by aircraft noise. This can give rise to complaints against the Airport's operations and submissions on planning processes seeking to constrain these operations.
11. Reverse sensitivity effects could also arise if structures were to encroach on obstacle limitation surfaces around airports, creating safety risks and operational constraints.

Reverse sensitivity and the National Infrastructure Plan

12. Protection of existing infrastructure will be key to managing the infrastructure deficit. Auckland Airport agrees that taking care of existing infrastructure (Section 4, Theme Two (taking care of what we have)) is a key issue that must be addressed in the National Infrastructure Plan. Management of reverse sensitivity effects is a key part of this and must be recognised and addressed in the National Infrastructure Plan, alongside asset management, resilience, and decarbonisation. If not managed appropriately, reverse sensitivity effects can result in constraints on existing infrastructure and in extreme circumstances, can force existing infrastructure to relocate. Where infrastructure is unable to operate at capacity, further investment in that type of infrastructure is needed elsewhere to meet demand. This is avoidable and clearly recognising reverse sensitivity will help ensure future investment is not diverted from new high-value projects.

13. For airports, new social infrastructure such as healthcare and education can give rise to reverse sensitivity effects.

This creates an inherent tension in the National Infrastructure Plan between investing in new social infrastructure that may be sensitive to aircraft noise and protecting existing significant infrastructure, such as airports. If reverse sensitivity effects on existing infrastructure that has a function and operational need to locate in a certain area (such as airports) are not effectively managed, this could pose considerable financial risks for Government and private infrastructure providers.

Relief sought

14. The Discussion Document must recognise the potential for new infrastructure developed in accordance with the National Infrastructure Plan to generate reverse sensitivity effects on existing significant infrastructure, such as airports. There should be a strong direction in the Plan to expressly consider and avoid reverse sensitivity effects when making investment decisions in relation to new infrastructure development.

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