

**Oral Submission to the Wellington Airport Expansion Hearing, Thursday 20  
May – Tim Jones**

**Name of submitter:** Timothy (Tim) Jones

**Name of Applicant:** Wellington International Airport Limited  
("WIAL")

**Site address:** 28 Stewart Duff Drive, Rongotai

**Service request number:** 462159

**Activity Type:** Requirement for designation: Wellington  
Airport East Side (**East Side Designation**)

**Service request number:** 455891

**Activity Type:** Requirement for designation: Wellington  
Airport Main Site (**Main Designation**)

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I am opposed to both proposed designations, and in my view, the proposed expansion fails to meet the purposes of the Resource Management Act, and would cause significant adverse effects that cannot be mitigated by conditions.

I have set out my reasons in full in my written submission. Here, I wish to address matters raised in the expert evidence and other material made available to submitters. I will focus on the climate arguments, but I will also add that the lack of consensus between the acoustic expert witnesses makes it clear that the noise effects remain significant even if the proposed conditions were applied.

**Section 42a Report – Mr Ashby**

In his s42a report, with regard to the East Side designation, Mr Ashby recommends:

That the Hearing Commissioners recommend to WIAL as 'Requiring Authority', that the requirement for the East Side Area be withdrawn under section 171(2)(d) of the Resource Management Act 1991, unless appropriate noise and climate change conditions are developed and accepted under section 171(2)(c) of the Resource Management Act 1991. 2. That to give effect to Recommendation (1) above should appropriate noise and climate change conditions be possible, appropriate conditions are drafted for inclusion in the Wellington City District Plan.

I have briefly noted the noise issue above, but am aware that other submitters will treat this in much more depth. I agree that the requirement should be withdrawn on noise grounds. In my view the expert witness evidence, and the outcome of expert witness conferencing,

have shown that conditions cannot be developed to mitigate the significant adverse noise effects.

I further agree with Mr Ashby that the application should be withdrawn on climate grounds, but I disagree that the proposed condition – or indeed any condition of the type proposed – can mitigate these effects.

As a result of the expert witness conferencing between Mr Ashby and Mr Kyle, appearing for WIAL, the witnesses agreed that the purposes of both designations should be expanded to make it clear that the development of “sustainable infrastructure” should be provided for, and this joint witness statement goes on to say:

"By sustainable infrastructure, we mean facilities that support the move towards decarbonisation of the Airport's own activities, and also those which support the decarbonisation efforts of third parties". (p. 3)

When it comes to aviation, the emissions from the airport’s own operations are a very small fraction of the emissions from third parties, such as the aircraft and airlines that use the airport. The evidence of Mr Conway, for WIAL, makes it clear that aviation is over a decade away from making any meaningful reduction in emissions, and many decades away from decarbonisation.

As Ms Dewar notes in her legal submission for the applicant, the Panel is empowered under section 5ZN of the “Zero Carbon Act” to take climate change targets and emissions reductions plans into account.

### **Evidence of Mr Conway**

Mr Conway’s evidence for WIAL on the future of aviation devotes considerable attention to various options for the partial or full decarbonisation of aviation. His evidence makes it very clear that any significant reduction in emissions from aviation is decades away. For example:

38. There is no evidence to suggest that battery electric aircraft will be realistic for the majority of the world’s airlines until the mid-2030s and beyond (pp. 9-10)

46-47 Even though some aircraft manufacturers like Airbus believe hydrogen aircraft could be available as early as 2035, there are likely to be limitations on the extent to which liquid hydrogen can be used for aviation. ... .. To become a viable solution for all market segments, hydrogen aircraft will need another breakthrough with the airframe design to compensate the higher volume required to store liquid hydrogen. (p. 11)

Mr Conway’s evidence shows that any expansion of Wellington airport, as proposed in these designations, will lead to an increase in emissions if carried out before the mid-2030s, at the very earliest.

### **Evidence of Mr Sapsford**

The airport claims that the proposed designations will lead to economic benefits. However, the evidence of Mr Sapsford casts considerable doubt on those claims. The InterVISTAs modelling relied on by WIAL appears to be both deficient and outdated, not least in its failure to consider the effects of climate change, including the economic effects, on airport operations over the time horizon to 2050.

Such factors as the New Zealand Government's Paris Agreement commitments, its 2020 declaration of a climate emergency, the forthcoming 2024 consideration by the Climate Change Commission of the treatment of international aviation emissions under Section 5(R) of the Zero Carbon Act, and Wellington City's emissions reductions commitments under its Te Atakura climate action plan – not to mention the worsening effects of climate change and their economic consequences – render WIAL's modelling, and the growth assumptions based on that modelling, no longer fit for purpose. As Mr Sapsford says,

20. Without an assessment of how climate change and the response to it will affect demand for aviation services, there is insufficient information to make a judgement about the reliability of claimed economic benefits ... for the project currently under consideration, or indeed whether it is reasonably necessary at all. (p. 5)

## **Conclusion**

Without derogating from my other reasons for opposing both designations, as set out in my written submission, I submit that:

1. Mr Ashby has correctly identified noise effects and climate effects as significant, and as two key reasons for declining the East Side designations.
2. The proposed conditions for mitigating the noise effects are acknowledged in the expert witnesses' conferencing report as not being effective to mitigate all such significant effects.
3. The proposed conditions for mitigating the climate effects are wholly inadequate to meet the stated goals as agreed by the expert witnesses. I submit that no such condition is capable of mitigating the climate effects of the proposed expansion given that the aviation industry will remain highly dependent on fossil fuels during much of the project lifetime. Airport expansion plans should be, at minimum, delayed until the aircraft fleet is wholly or very substantially decarbonised.
4. The claimed economic benefits of the projects rest on assumptions which are outdated, not fit for purpose, and fail to take into account the economic effects of climate change.

Therefore, I submit that these designations should be declined.