

BEFORE THE WAIPĀ DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 20 – Airport Northern
Precinct Extension to the Operative Waipā District
Plan

SUMMARY STATEMENT OF EVIDENCE OF BENJAMIN C LANGLEY

(AIRPORT OPERATIONS AND AERONAUTICAL RISKS) ON BEHALF OF WAIKATO REGIONAL AIRPORT LTD

17 MARCH 2023

Introduction

1. I am the Group General Manager – Airport Operations at Hamilton Airport, my role has a broad remit but in particular is responsible for safety and compliance of all airport operations under both our Airport certification (Part 139) and Safety Management System (Part 100) of the Civil Aviation Act 1990.
2. My submission provides evidence on behalf of Waikato Regional Airport Ltd (WRAL) on how the bat habitat requirements of Plan Change 20 (PC20) or those sought by submitters may affect the aeronautical operations of Hamilton Airport.

Overview of Concerns

3. Bird strike represents the highest equal aeronautical risk at Hamilton airport with a risk rating of 'medium'. Although birds and resulting bird strikes are a low probability, the consequences of a bird strike can be catastrophic and of high consequence. For example, a bird striking or jamming critical surfaces of the aircraft causing loss of flight control.
4. The Airport, from a health and safety perspective, has a duty to mitigate risk from any hazardous wildlife and in particular bird life that may cause a threat to aeronautical activities. The CAA consider "bird concentrations on and around aerodromes constitute a very real threat to aircraft safety."
5. Airports also operate under certification, that specifies that an aerodrome operator must, if any wildlife presents a hazard to aircraft operations, establish an environmental management programme for minimising or eliminating the wildlife hazards.
6. The Airport implements the following mitigation measures in relation birds:
 - a. Bird patrols associated with pre-landing and take-offs – including delays in approaches or take-offs in the event birds are identified.
 - b. Wildlife management programmes to control bird population, including an Authority to disturb and kill protected wildlife under s54 of the Wildlife Act 1953
 - c. A pasture management programme within the operational area of the Hamilton Airport i.e. high-endophyte grass.
 - d. Monitoring of all bird activity, recording of all bird events i.e. bird strikes and near misses.
7. The record of bird events has identified that there is an increase in the number of bird related incidents. This increase is quantified in the Civil Aviation Authority Bird Incident Rate Report 2022 that shows:
 - a. Bird activity has risen significantly, and Hamilton Airport has a high-risk rating that is trending upward.

8. Over the last three years (2020-2022) Hamilton Airports own data (collected independently of the CAA) has recorded a steady increase in actual and near miss bird strike results, with 69, 84, and 99 strikes respectively. This represents a 30% increase in bird related incidents over the period.
9. These conclusions provide a genuine concern for the Airport operations and increases the need to provide mitigations and controls for bird activity at or near the Airport and land owned by WRAL.

Bat Habitat Protection Areas

10. The Airport is concerned that the protection and/or creation of bat corridors or habitat areas may have unintended consequences of increased bird activity near the Airport or across the runway by providing increased habitat and feeding opportunities.
11. For this reason, WRAL's further submission requested that bat corridors/bat habitat and any future SNA's that are to be identified within or near the PC20 footprint will need to ensure that they are encouraging the movement of both birds and bats away from the Airport environs. WRAL also oppose the identification of bat habitat SNA's on its land or the other portions of the Airport Business Zone for the same reasons as identified above.
12. From an operational perspective, I am comfortable with the extent and location of the Bat Habitat Area (BHA) proposed in the Structure Plan, as attached to the Evidence in Chief of Ben Inger on behalf of the Applicant. I am also comfortable with the location of the compensation site relative to the Airport. I am comfortable because, in my opinion, those areas:
 - a. Do not encourage flight corridors across the Airport operation area through the linkage of habitats.
 - b. Are a sufficient distance from the Airport operational area and do not provide habitat directly on a common boundary with the Airports operational area.
 - c. Are of an appropriate scale in the setting. Larger areas may have the potential to create better bird habitat, thus providing for feeding, foraging and nesting opportunities for birds increasing general bird activity in the Airport environs'.
 - d. Finally, consider and align with anticipated future Airport needs.

Conclusion

13. In my capacity as Group General Manger – Airport Operations for Hamilton Airport I have concerns about increased bird strikes around the Airport and the consequences that may arise from bird strikes.

14. Having regard to these concerns, I am comfortable with the extent and location of the BHA and compensation site relative to the Airport operational area. Any changes in what is proposed would need careful evaluation against the operational needs of the Airport. Providing for additional bat habitat SNAs on or in close proximity to the Airport, including on its land or the other portions of the Airport Business Zone is opposed by WRAL for the reasons I have set out in my primary evidence.
15. Thank you and open to any questions.