

## Technical Memorandum – Fast-track Application

### WIAL Southern Seawall Renewal Project

## Planning

**Date:** 3 March 2026

**Author and position:** Cedric Tevaga, Senior Consents Planner

**Discipline/expertise:** Resource Consents

**Issued to:** Susannah Goble, Senior Advisor Planning

### Introduction

This memo responds to a request for comment from the expert panel assessing Wellington International Airport Limited (WIAL)'s substantive application to replace and upgrade its southern seawall, and associated activities, under the Fast-track Approvals Act 2024 (the Act).

This memo provides comments on the consenting requirements of the project, an analysis of the effects of the proposal informed by the feedback from Council's advisors including conditions proffered by the applicant, and an analysis of the objectives and policies of the 2000 and 2024 District Plans.

### Pre-lodgement feedback on the draft application

WIAL (the applicant) invited feedback from Wellington City Council (the Council) on the Draft Conditions Set 1 dated 29 July 2025. The conditions were reviewed by myself along with Council's Compliance and Monitoring Team Leader, Ben Brown.

Having reviewed the draft conditions, I raised concerns where conditions intended Council to confirm the receipt any updated management plans for certification and if Council did not meet this, then the updated management plans were to be deemed certified. It was advised that Council would not proffer or agree to such conditions and it was unreasonable to impose conditions where Council's Compliance and Monitoring Team were obligated to review any documentations within a specific timeframe.

Having reviewed *D.04 Resource Consent Conditions* submitted as part of the Substantive Application, it is noted that the applicant have taken on board this feedback. I note some of Council's advisors have also recommended suggested

changes which I have provided commentary below and can be read in full detail in their respective memos.

### **Review of application (and regulatory assessment)**

I have reviewed the consenting requirements (*H – Rules Assessment for RMA Approvals*) where the applicant has identified the relevant provisions of the 2024 and 2000 District Plan as well as the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESCS). Overall, I am satisfied that the applicant has identified all the relevant provisions under the district plans and NES and have correctly concluded that the overall activity status is a Discretionary Activity. As such, I have no further comment in this regard.

#### Statutory Acknowledgement Areas:

As the proposal is partly within statutory acknowledgement of the coastal marine area (CMA), Section 29(1) of the Port Nicholson Block Claims Settlement Act 2009 and Section 31(1) of the Ngāti Toa Rangatira Claims Settlement Act 2014 are relevant. Under these sections, Council is required to provide documentation to the respective iwi on applications for an activity within, adjacent to, or directly affecting a statutory area as listed in these Acts.

Given that the applicant has engaged with both Port Nicholson Settlement Block Trust (Taranaki Whānui) and Ngāti Toa Rangatira (Ngāti Toa) via Te Rūnanga o Toa Rangatira (Te Rūnanga) as well as the Wellington Tenths Trust (WTT) who have all expressed support of the project along with conditions adopted and proffered by the applicant, I am satisfied that these iwis are well informed.

#### Effects Assessment:

In reviewing the effects assessment, I have reviewed *A.07 – Assessment of Environmental Effects* and *A.10 – Approvals relating to the RMA* submitted as part of the substantive application. Given the effects of the proposal require technical input, I have relied on the advice of Council's following advisors:

- John Ashim, Earthworks Engineer
- Lindsay Hannah, Acoustic Engineer
- Carlos Ganoa, Transport Engineer
- Jude Weerasinghe, Streetlight Coordinator
- Nerena Rhodes, Suitably Qualified and Experienced Practitioner for Contaminated Land (of Pattle Delamore Partners Limited) on behalf of Council
- Kate Brown, Senior Reserves Planner
- Henk Louw, Urban Ecology Manager

#### Section 104 Assessment:

Having reviewed *A.10 – Approvals relating to the RMA* submitted with this application, I am satisfied that the applicant has addressed the high order planning documents including relevant National Environmental Standards, National Policy Statements, the New Zealand Coastal Policy Statement, Wellington Regional Policy Statement (RPS)

for the Wellington Region 2013, including Proposed Change 1 to the RPS as well as the Wellington City Council 2000 and 2024 District Plans in accordance of Section 104(1)(b)(i) – (vi) of the Act.

In Section 10.3.10 of *A.10 – Approvals relating to the RMA*, the applicant has in detail assessed the proposal against the objectives of the Strategic Direction of the 2024 District Plan. I am in agreement with applicants' conclusion that the proposal is consistent with these relevant objectives and have no further comment.

The applicant has also assessed the proposal against the objectives and policies of the following chapters under the 2024 District Plan:

- Infrastructure and sub-chapters
- Transport
- Contaminated Land
- Hazardous Substances
- Natural Hazards
- Sites of Significance to Māori
- Ecosystems and Indigenous Biodiversity
- Natural Features and Landscapes
- Public Access
- Coastal Environment
- Earthworks
- Light
- Noise
- Natural Open Space Zone
- Airport Zone

For the reasons discussed within the applicants' assessment and the advice received from Council's advisors as outlined in detail in their respective memos, I am of the view that the proposal is considered to be consistent with the objectives and policies of the relevant chapters under the 2024 District Plan.

In a similar vein, having reviewed the applicants' assessment of the objectives and policies of the relevant chapters under the 2000 District Plan including:

- Airport and Golf Course Recreation Precinct
- Open Space
- Earthworks

I am of the view the proposal is consistent with these.

The applicant also addresses Part 2 of the Resource Management Act 1991 (RMA) including Sections 5 to 8 which I consider to be fair and accurate and have no further comment.

As such, I am overall satisfied the applicant has comprehensively assessed relevant planning provisions required under Section 104 of the Act.

## **Post-lodgement work with the applicant**

### **Earthworks Assessment**

I have reviewed Mr Ashim's memo dated 12<sup>th</sup> February 2026 who has notably advised that the incorporation of dust management into the suite of the proffered earthwork conditions align with the feedback provided at pre-lodgement. He's also recommended an amendment to the geotechnical conditions of the Miramar Golf Course (MGC) Yard to include the involvement of suitably experienced Chartered Engineering Geologist (PEngGeol) and that they be present on site at all times during excavation works, to monitor ground conditions and provide immediate direction where required. I note that the applicant has incorporated this insertion into proffered conditions GEO.3 and GEO.4.

Furthermore, Mr Ashim has also recommended an additional condition that a geotechnical completion report is submitted to the Council within one (1) month of the earthworks being completed (please refer to Mr Ashim's assessment for full detail of the recommended condition). I concur with Mr Ashim's recommendation and have included this condition as the new condition GEO.6 and therefore shifting the current condition GEO.6 to condition GEO.7.

Overall, I accept Mr Ashim's advice and given the applicant have agreed to the recommended amendments to the suite of earthwork conditions and the inclusion of the geotechnical condition regarding the earthworks at the MGC Yard, the effects of earthworks are considered to be appropriately managed.

### Noise Assessment

As outlined in Mr Hannah's memo dated 16<sup>th</sup> February 2026, he is overall supportive of the proffered conditions to managing noise and vibration generated by the project. I accept Mr Hannah's advice and consider the conditions are sufficient to managing the effects of noise and vibration generated by the project's construction and operational activities.

### Lighting Assessment

I have reviewed Mr Weerasinghe's memo and his analysis of the artificial lighting effects assessment provided by the applicant including its impact on nearby residential areas and the natural environment. Overall Mr Weerasinghe has advised he is supportive of the proffered conditions by the applicant and has recommended an amendment to condition LTG.2 where colour temperature of below 3000k should be used where available to minimise the emission of blue light.

Based on Mr Weeringshe's advice, the conditions proffered by the applicant including the suggested amendment to condition LTG.2, the effects on any nearby residents and the surrounding natural environment are considered to be appropriately managed.

### Transport Assessment

In terms of the transportation and traffic safety aspects of the project involving the volume of earthworks and its impact on the transport network, Mr Gaona has assessed this in detail in his memo dated 25<sup>th</sup> February 2026.

Having considered the impacts on State Highway 1 (SH1), Mr Gaona outlines in his assessment that the draft Construction Traffic Management Plan (CTMP) comprises the joint co-ordination between the Council, WIAL and Waka Kotahi (NZTA) to ensure

that traffic routes along the state highway are managed during maintenance works or special events. Furthermore, based on NZTA's feedback on the proffered conditions, an advice note has been included to condition CT.2 where Council must consult with NZTA and that the draft CTMP under proffered condition CT.5 requires NZTA to provide input. Based on the proffered and amended conditions, any impact to SH1 will be managed through ongoing liaison with NZTA.

Mr Gaona has suggested a slight tweak to condition CT.7 regarding outbound traffic which has been reflected in the suggested changes as well as condition CT.9 which has already been amended accordingly. I accept Mr Gaona's advice and noting that the conditions proffered by the applicant and the slight amendment suggested, the impacts onto the transport network are considered to be managed.

### Contamination Assessment

I have reviewed Ms Rhodes' memo dated 27<sup>th</sup> February 2026 who has assessed the effects involving the disturbance of contaminated land.

Having reviewed the applicant's Detailed Site Investigation (DSI) at lodgement, the feedback response to Greater Wellington Regional Council (GWRC) and meeting with the applicants' technical expert for Contaminated Land, Ms Rhodes has advised that there are no outstanding matters. Furthermore, she has expressed support of the revised proffered conditions.

Having liaised with Senior Resource Advisor, Andrew Banks of GWRC, he's advised that consenting requirements under the NESCS will also be applicable from a regional perspective. Mr Banks has provided suggested changes to conditions CL.1, a new insertion of condition CL.2 and amendments to the now conditions CL.4 and CL.5. Having reviewed these suggested changes, I agree with Mr Banks' suggestions and have no further comment.

I accept Ms Rhode's assessment and subject to the agreement of the amended proffered conditions, the effects on human health from disturbance of contaminated land are considered low.

### Ecological Assessment

Having reviewed the ecological assessments submitted with the application, Mr Louw has advised that the proffered conditions and wildlife management plans around managing the effects of ecology is generally supported with suggested amendments.

Prior to the movement of any wildlife or establishment of any structures or installation of devices to protecting and managing wildlife, Mr Louw has requested that the Council's Parks Team review these. As such an insertion to condition GC.4 has been added to encapsulate this request. I support this suggested change as the Council's Parks Team will be able to assist the applicant on managing effects and ensuring the welfare on any affected wildlife.

Mr Louw has also advised that the proposed fence beside the *Rehabilitation Area* and *Stage 2 Kororā Colony* will need to be removed and relocated entirely on Crown land. Based on Mr Louw's advice and provided the applicant agrees to the suggested

changes to the proffered conditions as well as the removal of the fencing as aforementioned, the effects on ecology are considered to be appropriately managed.

### Landscaping, Visual and Natural Character Assessment

Ms Brown has outlined in her memo that the landscape conditions LV.1 to LV.25 is generally supported in principle. Aside from general agreement with the proffered landscaping conditions, Ms Brown has advised that the Reserves Act approvals are currently being sought. As such, I accept Ms Brown's advice and consider the proffered landscaping conditions are sufficient to managing the effects on landscape, visual and natural character. The approval under the Reserves Act is a separate process to consenting and therefore have no comment in this regard.

### **Outstanding matters**

There are no outstanding matters from a resource consenting perspective.

### **Proposed conditions**

Other than recommendations suggested by Council's advisors as outlined in their respective memos, there is no other proposed conditions or suggested changes.

Based on the conditions already amended and those subject to amendment, Council's Compliance and Monitoring Team have no further comments and have expressed agreement in principle on a coordinated joint monitoring with GWRC's compliance and monitoring team where conditions overlap between the district and regional jurisdiction.

### **Other matters**

There are no other matters for consideration.