

By Email

10 March 2026

EPA File ref: FTTA-2510-1118

Helen Atkins
Expert Panel Chair
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Dear Ms Atkins

Re: Response to Minute 2 of the Expert Panel – Invitation to comment on the Wellington International Airport Southern Seawall Renewal [FTTA-2510-1118]

Thank you for the invitation dated 10 February 2026 to comment on the substantive application made by the Wellington International Airport Limited (“WIAL” or “the applicant”) for the Southern Seawall Renewal project under the Fast-track Approvals Act 2024 (the Act).

Invitation to comment under Section 53(2)(a) of the Act

This letter summarises the Wellington City Council (“Council”) comments on the substantive application made by WIAL for the Southern Seawall Renewal project under section 53(2).

Scope of comments is technical considerations

In accordance with the advisory nature of Council’s role under section 53(2) of the Fast-track Approvals Act 2024, these comments do not make judgments on the overall merits of the proposal or its acceptability under relevant statutory planning frameworks, as that responsibility rests with the Expert Panel. The Council’s comments aim to inform and support the Panel’s decision-making, without expressing a view on whether the application should ultimately be granted or declined.

This approach ensures the Council feedback focuses on identifying potential effects, risks, and implementation considerations relevant to each discipline rather than undertaking a comprehensive assessment of the application.

Comments relate to relevant approvals only

The comments provided in this response relate to the approvals sought by the application that are relevant to the Council:

- Resource consents necessary to construct, operate, and maintain the Project, which would otherwise be applied for under the Resource Management Act 1991 (RMA);
- Concessions (in the form of leases, licences, and / or easements) to enable activities on local purpose (esplanade) reserve land administered by the Council which would otherwise be applied for under the Reserves Act 1977 (Reserves Act).

Summary: no significant issues, a few minor changes

A summary of the technical comments provided by Council advisors is set out in this response. The technical comments do not identify any significant issues with the project. Extensive pre-lodgement consultation between the Airport's technical advisors and council advisors between June and October 2025 resolved the majority of issues initially identified.

A small number of minor changes are proposed to the substantive application which primarily relate to the condition set proposed. These are detailed in this response under 'Summary of the outstanding matters in Council comments'. Proposed changes of conditions are set out in the updated set of conditions, attached as **Appendix 10**.

Details of the use of the reserves land (through lease, licences, and / or easements) is still ongoing through discussions between the Council and the Applicant. The final agreements are anticipated to be resolved when the panel consider the conditions of any approvals.

Pre-lodgement sharing of information and feedback was constructive

WIAL approached the Council for comments on WIAL's draft application for the Southern Seawall Project in June 2025. The applicant provided an early set of conditions in July 2025. The information provided by WIAL to the Council for comment was clear and comprehensive allowing advisors to provide meaningful feedback.

Council technical advisors provided iterative feedback on WIAL's draft application material and conditions between July and October. There were three main tranches of comments provided to WIAL up to 23 October 2025.

General agreement was reached between WIAL and Council advisors across many technical areas during this pre-lodgement period. The specific feedback provided and responses to the feedback is detailed in the technical memos prepared by Council advisors and attached to this response. WIAL provided the Council with a clear

breakdown for how the feedback informed the substantive application. This is also included in the substantive application material (F.07).

The Council considers WIAL's pre-lodgement consultation was meaningful and constructive. WIAL provided clear and comprehensive information for comment and sufficient time for advisors to provide feedback. The Council appreciates the opportunity to provide pre-lodgement feedback and WIAL's responsiveness and willingness to collaborate on this project.

Post-lodgement collaboration is ongoing

The Council has continued to work with the applicant post-lodgement to resolve specific technical details, further refine the draft condition set, and work through the terms of the leases, licences or easements related to the use of the reserves land.

The Council works alongside Greater Wellington Regional Council (GWRC)

The Council has worked alongside GWRC on the review of technical information and conditions for this project at both pre- and post-lodgement. The councils have collaborated as much as possible with the aim of taking a consistent approach in the feedback provided to the applicant.

The Council will continue to work with GWRC on any ongoing monitoring and compliance of any consents if this application were to be approved by the Panel.

Technical comments are in attached memos and summarised below

In response to the invitation, Council technical advisors have prepared memos detailing Council's technical comments on the key issues identified as relevant for this project. The following memos are provided as part of Council's response:

- Planning (prepared by Cedric Tevaga, Senior Consent Planner) - **Appendix 1**
- Reserves and Open Spaces (prepared by Kate Brown, Senior Reserves Planner) - **Appendix 2**
- Terrestrial Ecology (prepared by Henk Louw, Urban Ecology Manager) - **Appendix 3**
- Transport (prepared by Carlos Gaona, Transport Engineer RMA) - **Appendix 4**
- Earthworks and Geotechnical matters (prepared by John Ashim, Earthworks Engineer) - **Appendix 5**
- Contaminated land (prepared by Nerena Rhodes, Technical Director - Contaminated Land, Pattle Delamore Partners Ltd) - **Appendix 6**
- Climate change and adaptation (prepared by Jamuna Rotstein, Climate Change Adaptation Lead) - **Appendix 7**
- Lighting (prepared by Jude Weerasinghe, Streetlighting Coordinator) - **Appendix 8**
- Noise and vibration (prepared by Lindsay Hannah, Senior Environmental Noise Officer) - **Appendix 9**
- The application has been reviewed in respect of Construction Traffic Management by Duane Greyling, Network Control Team Lead with comments included in the summary of this letter.

Below is a summary of each technical memo. Advisors had access to the substantive application material dated 23 October 2025 as well as the additional and updated application documents listed on the Fast Track website dated 13 November 2025, 30 January 2026, 18 February 2026.

Council staff have confined their input to providing technical comment within their respective areas of expertise, in accordance with the advisory nature of Council's role under section 53(2) of the Fast-track Approvals Act 2024.

Planning – Resource Management Act 1991 (RMA) Approvals

The Council is satisfied that the application has identified the relevant approvals required under the RMA and have correctly concluded that the overall activity status is a Discretionary Activity under the 2024 District Plan.

The Council supports the application's assessment of 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 RMA. The applicant has also addressed Part 2 of the RMA including Sections 5 to 8.

The proposal is considered to be consistent with the objectives and policies of the relevant chapters under the 2024 District Plan and the 2000 District Plan. The Council is satisfied the applicant has comprehensively assessed relevant planning provisions required under Section 104 of the RMA.

Reserves and Open Space – Reserves Act 1977 Approvals

The application as it relates to the reserve is for occupation of the reserves for the renewal of the southern seawall and for the remediation of the eastern embankment; the use of the reserve areas to be planted for a five year maintenance and monitoring period; the use of the reserve for access to the Crown land for maintenance and monitoring of the kororā colony area; and post-construction access to the seawall and eastern embankment for ongoing monitoring and maintenance of the seawall and embankment.

Reserves Act approvals

Council provided written agreement on 30 April 2025 for Reserve Act approvals (lease, licence and/or easement) to be considered and approved (or declined) by the Expert Panel. Details of the use of the reserves land (through leases and licences) is still ongoing through discussions between the Council and the Applicant. The final agreements are anticipated to be resolved when the Panel consider the conditions of any approvals.

Landscape Concept Plan

The Landscape Concept Plan prepared by Boffa Miskell dated 21 October 2025 is generally in line with the feedback provided at pre-lodgement. A change to the fence design in the substantive application which includes an additional fence labelled "4" (refer to Figure 1 below), is not supported by the Council because it blocks access

to a reserve and is outside the kororā area. The fence should be located on Crown land.

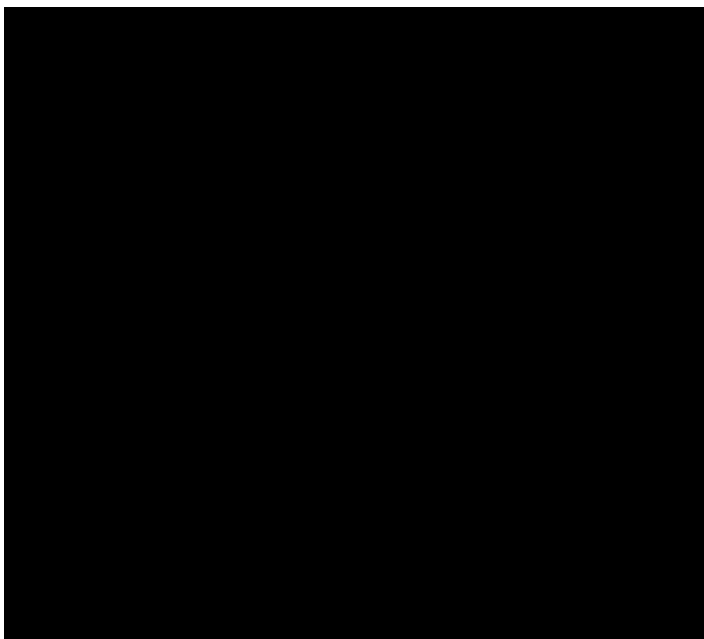


Figure 1: Snipped image Moa Point Yard - Overall Landscape Concept Plan prepared by Boffa Miskell dated 21 October 2025 showing fence labelled '4' which is not supported by Council

Terrestrial Ecology

The Council supports the ecological assessments submitted with the application and the proposed approach to the management of kororā, other coastal birds and lizards.

The proposed conditions and wildlife management plans around managing the effects of ecology are generally supported with some suggested amendments included in the updated conditions. These include a preference for direct funding towards kororā outcomes instead of pest management programmes, which would potentially duplicate the existing pest management on the Miramar Peninsula, and some clarification around provision of information and operational process for works on Council reserve land.

Transport

The Council supports the approach taken by the applicant to assess and manage transportation effects from the project. It is noted that an increase on travel time for general traffic may be of up to 5 minutes at worst, which the Council considers is acceptable based on the number of barging days (110 days across 6 to 8 years).

The Council agrees that the safety concerns regarding to seawall construction traffic on local roads can be managed and mitigated via a Construction Transport Management Plan.

The Council supports the proposed transport conditions with the exception of recommending minor wording change to the condition relating to the heavy vehicle route to and from the project area.

Construction Traffic Management

The Council provided comments on construction traffic management at pre-application stage which have been incorporated in the application.

The Council supports the conditions relating to traffic management as they align with the Council's current and future requirements for working on the Wellington City roading network. There may be opportunities to further improve the traffic management; however, this can be assessed by the Council in more detail once the formal traffic management application has been submitted in the form of a Corridor Access Request.

Earthworks and Geotechnical

The Council generally supports the approach taken to earthworks and geotechnical matters. The draft conditions were developed by WIAL in consultation with the Council and Greater Wellington Regional Council (GWRC).

The conditions submitted with the substantive application were reviewed by the Council post-lodgement. The Council recommended additional changes to address a small number of matters that had been omitted or amended. The Panel received an updated copy of these conditions dated 30 January 2026.

The Council has identified two outstanding matters it recommends still to be addressed through updates to the earthwork and geotechnical conditions. These recommended conditions provide oversight in the form of geotechnical supervision during excavations and require the provision of a Geotechnical Completion Report.

The applicant, and GWRC and Council officers have agreed that if this application is approved, any future erosion and sediment control monitoring will be undertaken by GWRC officials to avoid any conflict or confusion. However, any erosion and sediment control documentation submitted to GWRC is also required to be provided to the Council's Earthworks team for review.

Contaminated Land

The Council provided comments at pre-lodgement stage which were incorporated into the proposed conditions submitted with the substantive application and the revised Detailed Site Investigation dated 13 November 2025.

The Council agrees with the applicant's position that the effects on human health from disturbance of contaminated land are likely to be low and supports the proposed conditions on this matter.

Climate Change and Adaptation

At pre-lodgement stage, the Council expressed a preference for an extended scope of the project to include land adjacent to the project area, and an increase the modelling timeframes for the design life of the seawall to align with MfE Coastal hazard and climate change guidance.

The Council accepts the methodology used in the BECA reports (*Option Assessment and Design of Summary Report* dated 22 October 2025 and the *Assessment of Effects on Coastal Processes Report* date 22 July 2025) and the clarifications provided by WIAL at pre-lodgement stage in respect of the scope of the project and modelling timeframes. The Council notes that the Coastal Processes Report prepared by BECA concludes that the effects on the coastal processes of the project are likely to be minor. The Council has no further recommendations on these matters.

Lighting

The Council generally supports the lighting assessment provided by WIAL in the application, including the associated regulatory assessment.

The approach taken is generally appropriate for a project of this scale and recognises the need to manage spill light and glare, particularly during nighttime construction activities. However, given the duration of works and the absence of a detailed lighting design at this stage, some uncertainty remains regarding the precise extent of effects which will need to be addressed through the proposed conditions.

The Council supports the proposed conditions relating to construction lighting. Given the nature and scale of the proposed works, the Council considers the recommended conditions are generally appropriate to manage potential effects on nearby residents and sensitive ecological receptors.

Noise and vibration

The Council supports the approach taken in the Noise and Vibration Assessment to assess the effects of the proposal. The proposed noise and vibration conditions and the Construction Noise and Vibration Management Plan are supported as appropriate for managing effects arising from the project.

The Council considers the recommended detailed noise and vibration conditions, along with the Construction Noise and Vibration Management Plan (CNVMP), to be appropriate and key documents in the ongoing management of noise and vibration for this project.

Summary of the outstanding matters in Council comments

The following matters require further consideration:

Reserves Act: Details of the use of the reserves land (through leases, licences, and / easements) is still ongoing through discussions between the Council and the Applicant. The final agreements are anticipated to be resolved when the panel consider the conditions of any approvals.

Landscape: The Landscape Concept Plan prepared by Boffa Miskell dated 21 October 2025 is generally in line with the feedback provided at pre-lodgement however a change to the fence design made in the substantive application is not supported by the Council.

Ecology: Recommended changes to the conditions to reflect a Council preference for direct funding towards kororā outcomes instead of pest management programmes

and to clarify the provision of information and operational process for works on Council reserve land.

Transport: Recommended minor wording changes to the condition regarding the heavy vehicle route.

Earthwork and Geotechnical: Recommended inclusion of additional conditions to achieve oversight of detailed design, construction, and monitoring phases.

Conditions of consent

The Council has included an updated set of proposed conditions as part of this response, attached as **Appendix 10**. This set of conditions uses the updated conditions provided by the applicant on 30 January 2026 as a starting point.

Council officers are available for questions and information requests

The Council appreciates the opportunity to provide comments on the Wellington International Airport Southern Seawall Renewal Project.

We understand that the Panel may request further information from the Council or request attendance of technical advisors at a potential hearing, if required.

Please do not hesitate to contact me or Susannah Goble at [REDACTED] if you have any questions or require any additional information.

Yours sincerely



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Chief Planning Officer

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