



# memorandum

TO Susannah Goble FROM Nerena Rhodes, Technical  
Director Contaminated Land

Wellington City Council DATE 27 February 2026

RE Fast-Track Application, WIAL Southern Seawall Renewal Project: Technical Peer  
Review Contaminated Land

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## 1.0 Introduction

This memo responds to a request for comment from the expert panel assessing the 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 effects of the project on human health from disturbance of contaminated land. I also provided technical peer review to Greater Wellington Regional Council regarding the effects of the project on human health and the environment with respect to the Wellington Regional Plan.

## 2.0 Documents Considered

- ∴ Preliminary Site Investigation
- ∴ Detailed Site Investigation (Contamination) Sea Defences Renewal (draft), Beca Limited, 22 May 2025
- ∴ Detailed Site Investigation (Contamination) Sea Defences Renewal, Beca Limited, 5 September 2025
- ∴ Contaminated Land Management Plan WIAL Sea Defences Renewal, Beca Limited, 3 October 2025
- ∴ Substantive Application – Wellington International Airport Southern Seawall Renewal – Fast-track Approvals Act 2024, Assessment of Environmental Effects and Draft Consent Conditions, Wellington International Airport Limited, 23 October 2025.

## 3.0 Pre-lodgement Feedback on the Draft Application

Technical feedback provided on the draft application documents primarily focused on:

- ∴ the adequacy of the sampling in part of the site which was covered by a soil stockpile and therefore not sampled; and,
- ∴ whether an additional HAIL category was applicable to the site.

Technical feedback provided on the draft consent conditions was to require certification of the contaminated land management plan (or any substantive amendments to the plan) prior to works commencing on site and to reduce the time for SQEP engagement following an issue arising in Annual reporting from six months to three months.

These recommendations were incorporated into the resource consent conditions submitted with the consent application.

#### 4.0 Post-lodgement

The following documents were submitted by the applicant after lodgement of the fast-track application:

- ∴ Detailed Site Investigation (Contamination) Sea Defences Renewal, Beca Limited, 13 November 2025; and
- ∴ WIAL - GWRC Section 29 feedback response summary tables – updated 2 December 2025.

The revised DSI included a requirement for additional sampling in the area covered by the soil stockpile once the stockpile is removed and therefore this matter is no longer outstanding.

I had a discussion with the applicant's technical expert for Contaminated Land, Sarah Sheperd of Beca in December 2025 in which she clarified that the site conditions did not support application of HAIL Category H, this matter is also no longer outstanding.

#### 5.0 Regulatory Assessment

I agree with the applicant that the effects on human health from disturbance of contaminated land are likely to be low.

#### 6.0 Proposed Conditions

I support the proposed conditions for contaminated land.

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Prepared by



**Nerena Rhodes**

Technical Director Contaminated Land

Reviewed and Approved by



**David Whitty**

Technical Director Environmental Management