

Comments on a Substantive Application under section 53 of the Fast-track Approvals Act 2024: Marine ecology

Fast-track project name	Wellington International Airport Southern Seawall Renewal
Fast-track application number	FTAA-2510-1118
GW file number	FTA260318

Technical area	Marine ecology
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Documents considered	<ul style="list-style-type: none"> • A.02 Description of Proposal • A.07 - Assessment of Environmental Effects • C.02 Project Wide maps • C.01 Engineering plans • B.11 Marine Ecological Impact Assessment • Response to GW pre-application feedback on Marine Ecology (pages 26-31) • D.04 Resource consent conditions • G.09 Bioresarches Marine Mammal Management Plan

Comments

Key issues

1. Replacement of natural habitat with artificial concrete habitat will result in a net loss of habitat and biodiversity, if the artificial concrete habitat is not successful at providing replacement habitat.
2. Impacts of the project on pāua and rock lobster habitat are not well understood or managed.
3. Improvements can be made to the approach to managing and mitigating the effects of underwater noise on marine fauna.

Matters in contention and proposed solutions

Uncertainty around ecosystem recovery following project works

4. Kelp forests provide key ecological functions including primary production, habitat provisioning, and nutrient cycling, while subtidal rocky reefs create ecosystems that support

reef fish, pāua, kina, rock lobster and diverse benthic invertebrate assemblages. At the Southern Seawall site, the presence of these habitats satisfy criteria for protection under the National Policy Statement for Indigenous Biodiversity and the New Zealand Coastal Policy Statement (NZCPS).

5. The Applicant's Marine Ecological Impact Assessment states that the placement of the seawall is estimated to result in a loss of 3,934 m² of kelp bed and subtidal rocky reef habitat, which constitutes a meaningful ecological loss in the South Coast context. Kelp forests and shallow rocky reefs are restricted to the coastal zone. They are highly productive and ecologically rich per square metre, making localised habitat loss significant for biodiversity and ecosystem function and habitat connectivity.
6. Cubipods are designed primarily for coastal protection, not ecological restoration. When placed subtidally, they can provide hard substrate and structural complexity, however Cubipods provide only partial habitat creation rather than an ecological replacement of rocky reef habitat.
7. Under biodiversity and coastal policy frameworks, measures to address the loss of habitat would need to demonstrate comparable habitat area, comparable function, and long-term persistence of species through monitoring over time. Without strong evidence of success, Cubipods are more accurately described as a coastal engineering solution with secondary ecological benefits — not a like-for-like reef replacement.
8. Monitoring measures must demonstrate that the biodiversity and abundance of marine fauna and flora present preconstruction are not significantly different from that found within the project footprint two years post construction. Should the proposed monitoring of artificial structures associated with this project show that the affected marine ecosystem is not restored to natural two-years post construction, appropriate alternative habitat restoration or replacement measures should be implemented.

Relocation of pāua and rock lobsters

9. Both abalone (pāua) and rock lobsters are considered keystone species that perform fundamental roles in maintaining biodiversity, with their removal in some cases leading to significant ecosystem effects. Even the removal of juvenile pāua and lobsters may affect ecosystem structure and future recreational fishery stocks as small individuals are then not available to grow into reproductively mature individuals.
10. Overall, there is a high degree of uncertainty about the impacts of the project on pāua and rock lobster within the project area. While the applicant has provided a response to pre-application feedback on this issue, references are not cited in the response, which makes it difficult to validate the information provided. Further information regarding how many

individuals in each size class are likely to be lost is required to be able to determine the possible impact of the project works.

11. To address the uncertainty and potential impacts of the project on pāua and rock lobster (and associated ecosystems), it is recommended that:
 - (a) The applicant provide sufficient evidence to quantify the loss of these individuals from the project area and explain the likelihood of recruitment of these species from adjacent areas and from the pelagic larvae pool to better understand likely impacts.
 - (b) Red Rocks is investigated as a relocation site considering the existing poaching and recreational fishing pressure on the South Coast.

Improvements to managing effects of underwater noise

12. Soft-start periods of 20 minutes or more are widely considered minimum good practice and this duration should be drafted into the Marine Mammal Management Plan.
13. In the absence of Passive Acoustic Monitoring (PAM) during times of poor visibility, MMOs should listen for the presence of marine mammals and use this as evidence for justifying an operational shutdown.

Conditions

14. Conditions should be included to ensure that measures are established to determine the success of habitat restoration, achievement of these measures is monitored, and lists actions to be undertaken in the event that monitoring determines that the measures are not being achieved.
15. Conditions should be included to ensure that the impacts of the project on pāua and rock lobsters are established prior to the commencement of works, and impacted pāua and rock lobster are relocated to appropriate habitat along the South Coast.
16. The proposed Marine Mammal Management Plan should be amended to provide for:
 - (a) Soft-start periods of at least 20 minutes;
 - (b) MMOs to listen for the presence of marine mammals in the absence of Passive Acoustic Monitoring in times of poor visibility.