

9 March 2025

Wellington International Airport Southern Seawall Renewal Expert Panel

Attn: substantive@fasttrack.govt.nz

Tēnā koutou,

Thank you for consulting Te Rūnanga o Toa Rangatira (Te Rūnanga) and inviting us to comment on this fast-track application.

Te Rūnanga is the mandated iwi authority for Ngāti Toa Rangatira (Ngāti Toa). As such, we carry the responsibility of upholding the mana, values, and interests of our iwi within our rohe. These connections are reflected in our whakapapa, histories, and Treaty settlement redress, including statutory acknowledgements and ongoing applications under the Marine and Coastal Area (Takutai Moana) Act 2011.

The south coast, including Lyall Bay and Moa Point, holds deep cultural significance for Ngāti Toa Rangatira, the coastline has long been a mahinga kai, supporting customary fishing and gathering of taonga species such as pāua, kina, and kōura. Our connection to Te Whanganui a Tara and Te Moana o Raukawa traces back to our tūpuna Kupe and his tātara-ā-punga Maungaroa. This history is affirmed through generations of seasonal occupation, customary use, and Treaty settlement redress.

Ngāti Toa also holds statutory acknowledgements over several areas along the south coast, including Oteranga Bay, Tokahaere (Thoms Rock), Sinclair Head Scientific Reserve, Pariwhero (Red Rocks), Taputeranga Island, Te Whanganui a Tara (Wellington Harbour), and Te Moana o Raukawa (Cook Strait), as recognised in the Ngāti Toa Rangatira Claims Settlement Act 2014.

Te Rūnanga has previously outlined the significance of the south coast in two Cultural Impact Assessments: the 2015 CIA for the previous Wellington Airport Runway Extension, the 2024 Wellington South Coast CVA and our letter to the Applicant dated 25 August 2025.

We continue to uphold our kaitiaki responsibilities in these areas and seek to ensure that any development reflects and respects these enduring cultural relationships and the commitments made under our Treaty settlement.

The Position of Te Rūnanga o Toa Rangatira

Firstly, we would like to thank the Applicant for their constructive engagement with Te Rūnanga o Toa Rangatira throughout the development of this project. The Applicant has demonstrated a genuine effort to understand and incorporate the cultural values and concerns of mana whenua in relation to the proposed works.



We are therefore confident that, in large part, our concerns have been addressed prior to the lodgement of this application with the Environmental Protection Authority.

Te Rūnanga o Toa Rangatira recognises the need to renew and strengthen the southern seawall in order to protect critical infrastructure, and we therefore support this application. Te Rūnanga supports conditions M1.1 to MW.6, which provide for the establishment of a mana whenua advisory group to facilitate ongoing engagement between Te Rūnanga and WIAL regarding the delivery of the project.

Our review of the proposal has focused on the following primary areas:

- Kororā management
- Protection of taonga species
- Marine and terrestrial ecology
- Environmental impacts
- Archaeology and taonga tūturu

Notwithstanding our support for the project, Te Rūnanga o Toa Rangatira wishes to draw the attention of the Expert Panel and the Applicant to several matters that remain of concern.

Firstly, Te Rūnanga considers that there is a need for robust, long-term monitoring of the effects of the proposed works on kororā and pohowera populations. We therefore recommend that this be reflected through specific consent conditions requiring comprehensive, long-term monitoring to track populations and displacement effects over time. In addition to the permanent loss of nesting habitat resulting from the construction of the seawall, we are concerned about the displacement of kororā during construction and the foreseeable risks this creates beyond the immediate project area. Displaced birds may attempt to return to former burrows or seek alternative nesting sites in neighbouring areas, potentially increasing their exposure to threats such as vehicles and dogs. From a kaitiaki perspective, the indirect effects are as significant as direct habitat loss and must be anticipated and managed accordingly. Accordingly, Te Rūnanga seeks assurance that monitoring and mitigation measures will be sufficient in duration and scope to address both immediate and cumulative effects.

Secondly, Te Rūnanga remains concerned about the potential impacts on marine species, particularly those that currently inhabit the existing seawall and surrounding reef environment, including taonga species such as kōura and pāua. These species are of particular importance to mana whenua as mahinga kai, reflecting longstanding customary harvesting practices and ongoing cultural relationships with the south coast. We therefore seek further clarity on whether these species can be located and appropriately translocated prior to construction, in order to protect mahinga kai values, and to uphold the role of Ngāti Toa Rangatira as kaitiaki.

In addition to this we wish to advocate for the best possible protections for marine mammals. We are supportive of the MMMP (marine mammal management plan); however, we do recommend that the soft start procedures be strengthened, most notably the duration of soft start periods. Standard practice in Aoteatoa is generally understood to be a minimum of twenty minutes. Therefore, we recommend that the



MMMP be amended to specify a gradual escalation of works over a twenty-to-thirty-minute period.

Furthermore, Te Rūnanga notes the proposal by the Applicant to undertake maintenance, and repair works under the consent. Condition CA.26 would enable works extending up to 5 metres in horizontal projection at the ends of the existing structure, parallel to the shoreline, and more than 1 metre in vertical projection beyond the current structural dimensions. In our view, works of this scale extend beyond routine maintenance and this would effectively allow for modifications to the footprint and profile of the seawall. We are concerned about the uncertainty this creates, particularly in relation to environmental effects that may not be fully understood or assessed at this stage. Any increase in the length or height of the structure has the potential to alter coastal processes, marine habitat, and associated cultural values. Te Rūnanga o Toa Rangatira considers that any such changes to the footprint or dimensions of the seawall, even if framed as maintenance or repair should be subject to further assessment and engagement with mana whenua and in certain circumstances may require a new/additional consent to ensure that potential impacts are appropriately evaluated and managed.

Conclusion

In conclusion, Te Rūnanga o Toa Rangatira supports the application to renew and strengthen the southern seawall, recognising the importance of protecting critical infrastructure and acknowledging the constructive and respectful engagement undertaken by the Applicant throughout the development of this proposal. The Applicant's willingness to engage with us early and meaningfully has assisted in identifying and addressing most of our considerations and concerns prior to lodgement.

Our support is provided with the expectation that the matters highlighted above will continue to be addressed through the appropriate consent conditions and ongoing collaboration.

We remain committed to working collaboratively with the Applicant to ensure that the project proceeds in a manner that upholds the cultural and environmental values of the wider landscape, protects the critical infrastructure that the seawall supports, and delivers positive environmental outcomes.

Ngā mihi nui,

Ella Jaspers

Kaitohu Tuakana Rawa Taiao Matua – Senior Advisor Resource Management

