

## Comments on a Substantive Application under section 53 of the Fast-track Approvals Act 2024: Contaminated land

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

Technical area	Contaminated land
Author	Nerena Rhodes, Technical Director Contaminated Land, PDP
Date	25/02/26
Documents considered	<ul style="list-style-type: none"> <li>Detailed Site Investigation (Contamination) WIAL Sea Defences Renewal Project – Miramar Golf Course, Beca Limited, 9 October 2025 (Beca, 2025a)</li> <li>Detailed Site Investigation (Contamination) WIAL Sea Defences Renewal Project – Miramar Golf Course, Beca Limited, 9 October 2025 (Beca, 2025b)</li> <li>Detailed Site Investigation (Contamination) Sea Defences Renewal, Beca Limited, 5 September 2025 (Beca, 2025c)</li> <li>Detailed Site Investigation (Contamination) Sea Defences Renewal, Beca Limited, 13 November September 2025 (Beca, 2025d)</li> <li>Contaminated Land Management Plan WIAL Sea Defences Renewal, Beca Limited, 3 October 2025 (Beca, 2025e)</li> <li>WIAL - GWRC Section 29 feedback response summary tables – 11 June, October and 2 December 2025</li> </ul>

## Comments

### Key issues

1. There are gaps in sample coverage for the Miramar Golf Course DSI (Beca, 2025a and b).
2. The Contaminated Land Management Plan (Beca, 2025c) does not sufficiently address environmental risk.

## **Matters in contention and proposed solutions**

### *Inadequate Sample Coverage*

3. With respect to the Miramar Golf Club DSI (Beca, 2025a & b), there are gaps in sample coverage. The reasons for these gaps have not been provided. Further information is required to adequately justify the gaps in sampling or, if these areas are currently inaccessible, further sampling will be required prior to earthworks commencing. The gaps in sampling are to the south and east of the stormwater pond and the southern extent of the site.
4. It is not clear whether the stormwater pond in the Miramar Golf Club site will remain in place or be disturbed. If sediment in the pond is to be disturbed sampling will be required to establish the appropriate management and disposal.
5. We recommend the Panel request further information from the applicant to explain the sampling gaps, to enable the Panel to consider whether further sampling is required prior to earthworks.

### *Contaminated Land Management Plan – Environmental Risk*

6. The Contaminated Land Management Plan (CLMP) for the seawall (Beca, 2025c) was developed primarily for the protection of human health. The site has been assessed as being of medium human health risk. The CLMP should be updated to include environmental risks, so that environmental risks are appropriately considered during earthworks.
7. The CLMP states that soil samples analysed from the seawall project footprint did not exceed environmental and human health guidelines, however the indirect ecological guideline (PFAS National Environmental Plan 3.0, HEPA) was exceeded for some samples.
8. We recommend the Panel request that the CLMP is updated to address environmental risk.

## **Conditions**

9. Gaps in sampling could be addressed through a consent condition requiring that additional sampling is conducted by a SQEP as described in any further documentation provided regarding the Miramar Golf Club DSI. The results of sampling should be provided to Council prior to earthworks being conducted in these locations.
10. If the CLMP is not updated until after consent is granted, issues with the CLMP could be addressed by requiring the updated version be submitted to Council for certification prior to implementation.