

Section 51(2)(d) Fast-track Approvals Act 2014 Report

Wellington International Airport Southern Seawall Renewal

FTAA-2510-1118

Heritage New Zealand Pouhere Taonga (HNZPT) recommends:

- That the archaeological authority is granted, subject to conditions, under the Fast-track Approvals Act 2024 (FTA Act).
- That, if the authority is granted, Emily Howitt is **approved** as the approved person to carry out the archaeological work under the authority.

Introduction

1. On 23 October 2025, Wellington International Airport Limited (the Applicant) lodged a substantive application for Wellington International Airport Southern Seawall Renewal (the Project) with the Environmental Protection Agency (EPA). On 14 November 2025 the substantive application was deemed complete and complied with section 46(2) of the FTA Act. It was deemed to not have any competing applications or existing resource consents under section 47 of the FTA Act on 28 November 2025.
2. As a part of the application, the Applicant has applied for an archaeological authority. HNZPT is the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT Act) under the FTA Act.
3. On 2 December 2025 the Panel Convener issued a Minute directing the EPA to obtain a report prepared by Heritage New Zealand Pouhere Taonga and the Māori Heritage Council, in accordance with section 51(2)(d) of the Act (December Minute).
4. This report is due 24 February 2026.

Purpose of the Report

5. The specific directions of the Panel Convener in the December Minute were:
 - (a) *How the weighting of matters set out in clause 4, Schedule 8 of the Act is to be approached, having regard to relevant senior court decisions;*
 - (b) *Whether they disagree with or wish to expand upon the expert technical reports or assessments lodged by the Applicant in support of the archaeological authority approval sought;*
 - (c) *Recommendation either to grant, subject to conditions, or decline the archaeological authority approvals sought, together with the basis of such recommendation;*
 - (d) *Any amendments considered necessary to conditions proposed in the application in the event of a recommendation to grant the archaeological authority approval*

sought, having regard to clause 5, Schedule 8 of the Act. Any proposed amendments are to be track changed.

6. This Report addresses these matters and makes a recommendation to the Panel regarding the archaeological authority application as part of the Project.

The Project

7. The project consists of the following elements:
 - a. Establishment of two construction yards – Miramar Golf Course Construction Yard (“MGC Yard”) and Moa Point Construction Yard (“Moa Point Yard”) – and using them, along with the existing George Bolt Street Construction Yard (“George Bolt Yard”), for storage and construction activities;
 - b. Reconstruction of the Southern Seawall with rock and Cubipods;
 - c. Remediation of the eroding Eastern Bank with rock protection;
 - d. Creation of two kororā colonies to support kororā habitation and breeding.

Documentation received and reviewed

8. This recommendation is based on HNZPT’s review of the following documents:
 - A.00 - Wellington International Airport Limited – Southern Seawall Renewal: Fast-Track Application and Assessment of Environmental Effects
 - A.001 - Fast Track Lodgement Cover Letter
 - A.02 - Description of the Proposed Works
 - A.04 - Mana Whenua Values Overview and Assessment
 - A.05 - Approvals Sought under Fast-track Approvals Act
 - A.13 - Approvals relating to Heritage NZ Pouhere Taonga Act 2014
 - B.03 EHA - Archaeological Assessment- Howitt, E. 2025, Southern Sea Defences Renewal: Stage 1: Archaeological Assessment of Effects (Howitt Assessment)
 - D.01 Proposed Archaeological Authority – Tracked – January 2026
 - D.01 Proposed Archaeological Authority – Clean – January 2026
 - E.10 HNZPT Authority 2024-484
 - F.12 Taranaki Whānui - Section 29 response letter - 17 October 2025
 - F.13 Wellington Tenth's Trust - Section 29 response letter - 25 September 2025
 - F.14 Ngati Toa - Section 29 response letter - 25 August 2025
 - G.01 EHA - Archaeological Site Management Plan- Howitt, E. 2025. Southern Sea Defences Renewal: Stage 1: Archaeological Site Management Plan
 - I.01 - List of Project Ownership and Records of Title
 - I.02 - List of Adjacent Landowners and Records of Title

Heritage New Zealand Pouhere Taonga Assessment

Weighting of clause 4, Schedule 8 matters

9. HNZPT has provided advice on this to the Panel in the Delmore application, a copy of that advice is appended to this Report as **Appendix A**. In short, the greatest weight is given to (a)

the purpose of the FTA Act; in respect of the matters set out in section 59(1)(a) of the HNZPTA, it is an overall assessment, rather than a hierarchy of matters for consideration.

Review of Archaeological Assessment

10. HNZPT agrees with the Howitt assessment, in particular:
- There is one recorded archaeological site (R27/554) within the project area, and archaeological evidence relating to this site may be present;
 - There is potential for additional archaeological sites and material to be encountered during the proposed works;
 - The proposed works may modify or destroy the recorded archaeological site, and there is potential that other sites may be modified or destroyed during the proposed works;
 - Archaeological monitoring and recording in areas of earthworks that have the potential to affect archaeological sites, and targeted archaeological investigations should archaeological material be encountered, will mitigate the adverse effects on the archaeological values within the subject land.

Review of draft conditions, including the Archaeological Management Plan

The Archaeological Management Plan (AMP)

11. HNZPT agrees that an AMP is essential to ensure mitigation of any adverse effects; the systematic recording and investigation of archaeological material (if encountered) will contribute to our understanding of Māori settlement of Te Motu Kairangi / the Miramar Peninsula.
12. As per the recommended conditions, the authority must be exercised in accordance with the AMP attached to the application (Emily Howitt Archaeology, August 2025, Southern Sea Defences Renewal: Stage 1 – Archaeological Site Management Plan), and any changes to the plan require the prior written agreement of HNZPT.

Proposed Conditions

13. The Applicant has proposed draft conditions, which have been considered by HNZPT against the FTA Act, HNZPT Act, and the standard conditions HNZPT imposes on authorities it grants. These standard conditions have demonstrated their effectiveness in regulating this type of activity and give effect to the relevant provisions of the Statement of General Policy.
14. HNZPT recommends amendments and an additional condition in order to ensure that the archaeological works:
- are undertaken in a culturally appropriate way; and
 - mitigate any adverse effects on the adversely affected archaeological values; and
 - will allow for any information collected to be recorded in a report and accessible to other archaeologists and interested persons; and
 - can be monitored and measured to ensure compliance.

15. Included at **Appendix B** is a track change version of the authority conditions, including reasoning for amendments.
16. Included at **Appendix C** is the HNZPT recommended authority with conditions.

Recommendation

17. HNZPT has considered the application against the criteria set out in clause 4, Schedule 8, summarised as follows:

Section 59(1)(a) HNZPTA

18. The granting of an archaeological authority for this application would be consistent with the matters set out in section 59(1)(a) of the HNZPTA:
19. There is no evidence to suggest that the historical and cultural heritage value of the recorded and any potential subsurface archaeological sites justifies their protection.
20. The application states this area does fall under Statutory Acknowledgement Areas and the Applicant has undertaken consultation with iwi/hapū, who have not expressed opposition to the application proposal. HNZPT has had regard to the Statutory Acknowledgement area.
21. HNZPT considers that the conditions, with the suggested amendments, for the Authority will work with any fast-track approval for the land use activity to effectively manage the identification and recovery of archaeological information within the application site.

Section 47(1)(a)(ii) and (5) HNZPTA

22. Section 47(1)(a)(ii) and (5) only apply for an authority application made pursuant to section 44(b) of the HNZPTA – a minor effects authority. This is not a minor effects application, and therefore these sections are not relevant.

Relevant Statement of General Policy

23. The relevant Statement of General Policy is Tauākī Mātai Whaipara, Archaeology Statement included in He Tauākī Kaupapahere Whānui, Statements of General Policy dated October 2025. (Statement of General Policy).
24. The proposal is consistent with the objectives and policies of the Statement of General Policy, in particular:
 - Policies 2.14-2.17, in relation to making the archaeological information accessible and relatable;
 - Policies 2.1-2.4 in relation to Māori cultural values and consultation;
 - Policy 2.8 that provides for kōiwi tangata to be treated in a sensitive and culturally respectful manner.

Section 45 HNZPTA Approved person

25. HNZPT considers that Emily Howitt has the appropriate qualifications and sufficient skill and competency to undertake the work required if the authorities are granted and has access to appropriate institutional and professional support.

Signed for and on behalf of Heritage New Zealand Pouhere Taonga,



Dean Whiting

Acting Chief Executive

Heritage New Zealand Pouhere Taonga

PO Box 2629

WELLINGTON 6140

Date: 24 February 2026

Appendix A

Re: Delmore [FTAA-2502-1015] Request for advice dated 11 April 2025

1. You have asked Heritage New Zealand Pouhere Taonga (Heritage New Zealand) for advice regarding the following:
 - i. the weighting of matters outlined in Schedule 8, clause 4 of the Fast Track Approvals Act 2024 (FTA Act), having regard to senior court decisions; and
 - ii. agreement or otherwise in respect of the statutory summary provided by Barker & Associates Ltd (Barker Report).

Weighting of matters outlined in Schedule 8, Clause 4 of the FTA Act

2. Schedule 8, clause 4 states:

For the purposes of [section 81](#), when considering an application for an archaeological authority, including conditions in accordance with [clause 5](#), the panel must take into account, giving the greatest weight to paragraph (a),—
(a) the purpose of this Act; and
(b) the matters set out in [section 59\(1\)\(a\)](#) of the HNZPT Act¹; and
(c) the matters set out in [section 47\(1\)\(a\)\(ii\) and \(5\)](#) of the HNZPT Act; and
(d) a relevant statement of general policy confirmed or adopted under the HNZPT Act.

3. The wording of the clause itself makes it clear that the Panel gives the greatest weight is given to (a) the purpose of the FTA Act. Of the other matters:

Section 59 matters

4. There is no hierarchy between the matters set out in section 59(1)(a), rather it is an overall assessment. This is evident in the assessment carried out by Heritage New Zealand that will be provided to the Panel with a recommendation.

Section 47(1)(a)(ii) and (5)

5. These sections only apply for an authority application made pursuant to section 44(b) of the HNZPTA – a minor effects authority.
6. The Delmore application is not for an authority pursuant to section 44(b), so the matters in Schedule 8, clause 4(c) are not relevant considerations for this application.

¹ Heritage New Zealand Pouhere Taonga Act 2014

Statement of General Policy

7. The relevant Statement of General Policy is *The Administration of the Archaeological Provisions under the Heritage New Zealand Pouhere Taonga Act 2014*, dated 29 October 2015.
8. Note, this is currently under review and we anticipate a new Statement of General Policy will be in place from October 2025.

Statutory Summary in Barker Report

9. We have reviewed section 13.3² and section 14.5³ of the Barker Report that set out the statutory requirements in relation to an approval under the HNZPT Act.
10. Section 13.3 sets out relevant information in relation to obtaining an approval pursuant to the HNZPT Act. We agree with the description of clauses 3, 4, and 5 of the FTA Act.
11. Section 14.5 uses subheadings to assess the matters set out in Schedule 8, clause 4 of the FTA Act that the Panel is to have regard to.
12. We agree that the matters listed are those contained in Schedule 8, clause 4. Of these, sections 47(a)(ii) and (5) HNZPT Act are not relevant considerations for this matter, as this is not an application made pursuant to section 44(b) HNZPT Act – minor works authority.
13. The s51 Report prepared by Heritage New Zealand will comment on each of these sections and give an assessment of same before reaching an overall recommendation for the authority application.

² Titled “Approvals Relating to HNZPT 2014 – Schedule 8”

³ Titled “Heritage Authority Approval Sought: Sections 59(1)(a) and 47(1)(a)(ii) and (5) of the HNZPT and Relevant Statement of General Policy”

Appendix B: Track change condition set

Archaeological Sites: R27/554 extends into the proposed George Bolt Yard

This Authority also applies to the potential discovery of and potential unrecorded archaeological sites, to be determined.

Location: Land adjacent to Wellington International Airport, in the Areas marked on Attachment 1.

Section 45 Approved Person: Emily Howitt or any other person approved under section 45.

1. The authority holder must ensure that all contractors working on the project are briefed on site by the s45 approved person (who may appoint a person to carry out the briefing on their behalf) prior to any works commencing. The briefing must include the possibility of encountering archaeological evidence, how to identify possible archaeological sites, the archaeological work required by the conditions of this authority, and contractors' responsibilities with regard to discovering archaeological evidence (including stopping works and parties to notify).
2. This authority may not be exercised until landowner consent is received by Heritage New Zealand Pouhere Taonga for all land affected by this authority.
3. Prior to the commencement of any on-site archaeological work, the authority holder must ensure that Heritage New Zealand Pouhere Taonga is advised of the date when work will begin.
4. The authority holder must also ensure that Heritage New Zealand Pouhere Taonga is advised of the completion of the on-site archaeological work, within two working days of completion.
5. The authority must be exercised in accordance with the management plan attached to the application (Emily Howitt Archaeology, Southern Sea Defences Renewal: Stage 1 - Archaeological Management Plan, Prepared for Wellington International Airport Ltd). Any changes to the management plan require the prior written agreement of Heritage New Zealand Pouhere Taonga.
6. Any earthworks that may affect any archaeological sites must be monitored by the s45 approved person who may appoint a person to carry out the monitoring on their behalf.
7. Any archaeological evidence encountered during work subject to the exercise of this authority must be investigated, recorded and analysed in accordance with current archaeological practice.
8. Annually from the date of issue of this authority, the authority holder must submit to Heritage New Zealand Pouhere Taonga and Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira a written report containing a summary of the progress of the project.

Commented [HNZPT1]: Standard HNZPT format, and for concision.

Commented [HNZPT2]: A person is approved under section 45 to carry out archaeological activities for the authority they have been nominated for. 'Any other person approved under section 45' implies that any person who has been approved under s45 for any authority can undertake the archaeological work required by this authority. Should the applicant want to have another person approved under section 45 for this authority, they can make an application to HNZPT at any time during the lifespan of the authority.

Commented [HNZPT3]: Landowner consent has not been provided for LINZ.

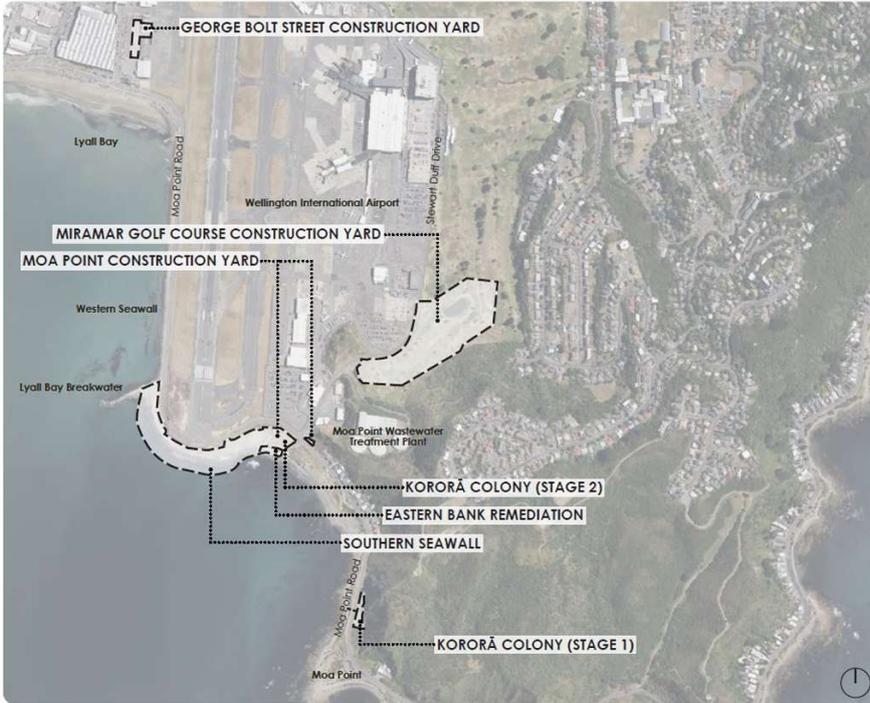
Commented [HNZPT4]: 'Also' is suggested to be removed as this condition is stand-alone.

Commented [HNZPT5]: Change to HNZPT standard condition for concision.

Commented [HNZPT6]: Given that the authority is likely to be granted for a time period of 10 years or more, an annual report will ensure that HNZPT, Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira can remain aware of how works are progressing before the production of a final report at the end of archaeological work.

9. Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira shall be informed five working days before the start of the archaeological work.
10. In addition to any tikanga agreed, the following shall apply for Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira:
- a. Enable access in order to undertake tikanga consistent with any requirements of site safety.
 - b. Notify if any kōiwi (human remains) are encountered. All work should cease within 5 metres of the discovery. Heritage New Zealand Pouhere Taonga and New Zealand Police must also be advised immediately in accordance with Guidelines for Kōiwi Tangata/Human Remains (AGS8 2010) and no further work in the area may take place until future actions have been agreed by all parties.
 - c. Notify if any possible taonga are identified to enable appropriate tikanga to be undertaken, so long as all statutory requirements under the Heritage New Zealand Pouhere Taonga Act 2014 and the Protected Objects Act 1975 are met.
 - d. Provide a copy of any reports completed as a result of any archaeological work that is subject to this authority and give an opportunity to discuss it with the s45 approved person if required.
11. Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira shall be informed two working days after the finish of the archaeological work.
12. Within 20 working days of the completion of the on-site archaeological work associated with this authority, NZAA Site Records must be updated in ArchSite based on current archaeological practice.
13. Within 20 working days of the completion of the on-site archaeological work associated with this authority, the authority holder shall ensure that an interim report completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023) is submitted to Heritage New Zealand Pouhere Taonga for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library.
14. Within 12 months of the completion of the on-site archaeological work, the authority holder shall ensure that a final report, completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023), is submitted to Heritage New Zealand Pouhere Taonga Senior Archaeologist for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library. Digital copies of the final report must also be sent to: the NZAA Central Filekeeper, Wellington Museum, Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira.

Attachment 1 – Location and Areas Covered by this Authority



Appendix C: HNZPT recommended authority with conditions

WIAL Southern Seawall Renewal Project

ARCHAEOLOGICAL AUTHORITY

Authority Number: [TBC] **File Reference:** [TBC]

Determination Date: [TBC] **Expiry Date:** [TBC]

Authority Holder: Wellington International Airport Limited

Postal Address: PO Box 14175
Wellington 6241

Archaeological Sites: R27/554 and potential unrecorded archaeological sites, to be determined.

Location: Land adjacent to Wellington International Airport, in the Areas marked on Attachment 1.

Section 45 Approved Person: Emily Howitt

Landowner Consent: To be provided

DETERMINATION

This archaeological authority is granted pursuant to section 42(4)(i) of the Fast-track Approvals Act 2024 to enable the construction, operation and maintenance of the Wellington International Airport Southern Seawall Renewal Project, subject to the following conditions.

CONDITIONS OF AUTHORITY

1. The authority holder must ensure that all contractors working on the project are briefed on site by the s45 approved person (who may appoint a person to carry out the briefing on their behalf) prior to any works commencing. The briefing must include the possibility of encountering archaeological evidence, how to identify possible archaeological sites, the archaeological work required by the conditions of this authority, and contractors' responsibilities with regard to discovering archaeological evidence (including stopping works and parties to notify).
2. This authority may not be exercised until landowner consent is received by Heritage New Zealand Pouhere Taonga for all land affected by this authority.
3. Prior to the commencement of any on-site archaeological work, the authority holder must ensure that Heritage New Zealand Pouhere Taonga is advised of the date when work will begin.
4. The authority holder must ensure that Heritage New Zealand Pouhere Taonga is advised of the completion of the on-site archaeological work, within two working days of completion.

5. The authority must be exercised in accordance with the management plan attached to the application (Emily Howitt Archaeology, Southern Sea Defences Renewal: Stage 1 - Archaeological Management Plan, Prepared for Wellington International Airport Ltd). Any changes to the management plan require the prior written agreement of Heritage New Zealand Pouhere Taonga.
6. Any earthworks that may affect any archaeological sites must be monitored by the s45 approved person who may appoint a person to carry out the monitoring on their behalf.
7. Any archaeological evidence encountered during the exercise of this authority must be investigated, recorded and analysed in accordance with current archaeological practice.
8. Annually from the date of issue of this authority, the authority holder must submit to Heritage New Zealand Pouhere Taonga and Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira a written report containing a summary of the progress of the project.
9. Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira shall be informed five working days before the start of the archaeological work.
10. In addition to any tikanga agreed, the following shall apply for Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira:
 - a. Enable access in order to undertake tikanga consistent with any requirements of site safety.
 - b. Notify if any kōiwi (human remains) are encountered. All work should cease within 5 metres of the discovery. Heritage New Zealand Pouhere Taonga and New Zealand Police must also be advised immediately in accordance with Guidelines for Kōiwi Tangata/Human Remains (AGS8 2010) and no further work in the area may take place until future actions have been agreed by all parties.
 - c. Notify if any possible taonga are identified to enable appropriate tikanga to be undertaken, so long as all statutory requirements under the Heritage New Zealand Pouhere Taonga Act 2014 and the Protected Objects Act 1975 are met.

- d. Provide a copy of any reports completed as a result of any archaeological work that is subject to this authority and give an opportunity to discuss it with the s45 approved person if required.
11. Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira shall be informed two working days after the finish of the archaeological work.
12. Within 20 working days of the completion of the on-site archaeological work associated with this authority, NZAA Site Records must be updated in ArchSite based on current archaeological practice.
13. Within 20 working days of the completion of the on-site archaeological work associated with this authority, the authority holder shall ensure that an interim report completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023) is submitted to Heritage New Zealand Pouhere Taonga for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library.
14. Within 12 months of the completion of the on-site archaeological work, the authority holder shall ensure that a final report, completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023), is submitted to Heritage New Zealand Pouhere Taonga Senior Archaeologist for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library. Digital copies of the final report must also be sent to: the NZAA Central Filekeeper, Wellington Museum, Taranaki Whānui ki te Upoko o te Ika a Maui and Ngāti Toa Rangatira.



Attachment 1 – Location and Areas Covered by this Authority

