

9 October 2025

To

[Redacted]

18 - 32 Manners Street | PO Box 10 420, Wellington 6143

By Email:

[Redacted]

Tēnā koe

[Redacted]

### **Wellington Airport's Southern Seawall Renewal project – response to DOC feedback on terrestrial ecology**

As you know, Wellington International Airport Limited (**WIAL**) is preparing an application for the statutory approvals needed to renew the seawall at the southern end of the Airport's runway, and in doing so has been engaging closely with Department of Conservation (**DOC**) officers.

DOC has previously provided feedback on the draft marine ecology assessment and conditions (through your letter dated 21 August 2025). On Wednesday 24 September we provided a response to your feedback, primarily in the form of a memorandum prepared by [Redacted] (author of the marine ecology assessment).

We are writing again to respond to the feedback from DOC on the draft terrestrial ecology application material we provided on 9 September 2025:

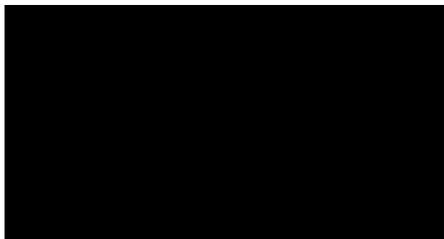
- Draft Ecological Impact Assessment
- Draft terrestrial ecology conditions
- Draft Avifauna Management Plan
- Draft Lizard Management Plan

WIAL appreciates the time taken by DOC staff to consider and provide feedback on this material. That feedback has been carefully considered by WIAL and its expert ecologists and planners. WIAL's response to that feedback is set out in the attached table. Our intention is to reflect the updates we are proposing in the application materials.

We understand that we are likely to receive DOC's feedback on the draft kororā materials at some point in the week of 13 October 2025. We will respond to that feedback as promptly as we are able to once it is received, noting that we intend to lodge the Fast-track Approvals Act application in mid-late October.

Thank you again, and we look forward to continuing open and productive discussions with DOC in the coming months as the project progresses through the FTAA process.

Yours sincerely,



**LIST OF APPENDICES:**

Appendix 1: Table of Responses to DOC Feedback

APPENDIX 1 TABLE OF RESPONSES TO DOC FEEDBACK

Technical report / document	Comments by DOC	WIAL's response
<p>Ecological Impact Assessment and AMP / LMP</p>	<p>It is unclear why the MGC yard is excluded from the Coastal Avifauna Breeding Management Plans with reference to banded dotterels? If potentially suitable habitat is created through construction of the MGC yard it should be managed in the same manner as the Moa Point Yard.</p>	<p>The management measures for banded dotterels, discussed in the EcIA and addressed in more detail in the draft AMP, focus on the Moa Point Works Site based on records of banded dotterels during the breeding season. There are no such records at the MGC Yard.</p> <p>However, on the advice of Biosearches, WIAL accepts that the construction of the MGC Yard could create potentially suitable habitat for banded dotterels in that location. On that basis, the AMP will be updated to include management measures for banded dotterel at the MGC Yard. Those measures will likely differ from the measures proposed for the Moa Point Works Site, because the MGC Yard does not currently provide banded dotterel habitat (the focus will therefore be on deterring any possible use of the MGC Yard for breeding by banded dotterels, once the MGC Yard is established). The updates will be reflected in the version of the AMP that is submitted with the FTAA application.</p>
	<p>DOC suggests mitigation measures for banded dotterel (nest cages and chick refuge huts) are not necessary given the likely low number of avian predators within airport control zones and mammalian predators on the Miramar Peninsula. Nest cages may also pose a potential risk. We recommend removing</p>	<p>The banded dotterel measures were recommended by Biosearches. WIAL has carefully considered the proposed nest cages and refuge huts from an airport operational perspective, and is comfortable with what is proposed.</p> <p>At this stage, these measures have been retained in the AMP. If DOC is concerned about any particular risk associated with the provisions of nest cages and refuge huts from an ecological perspective, WIAL and Biosearches would be happy to discuss / consider that.</p>

Technical report / document	Comments by DOC	WIAL's response
	<p>these measures from the Management Plan.</p> <p>A Lizard Management Plan (LMP) and Ecological Impact Assessment (EcIA) have been submitted with all relevant information pertaining to lizard approval split between the two documents. Please can the applicant clarify if both documents are to be submitted as part of the substantive application for wildlife approval. If both documents are to be submitted, it would be useful for the LMP to contain cross-references to the relevant information requirements that have been presented within the EcIA (Section 6 &amp; 7).</p> <p>If the intention is not for the EcIA to be lodged with wildlife approval documentation, then Section 7 of the EcIA (Wildlife Act) summarises the key requirements of the wildlife approval and states where within each report the relevant information is found. All</p>	<p>The EcIA and LMP have been prepared to support the application for resource consents and for wildlife approval. In particular:</p> <ul style="list-style-type: none"> <li>- The EcIA is generally relevant to the wildlife approval, but in addition section 7 of the EcIA specifically addresses the information requirements for wildlife approvals (and section 7 cross refers to other sections of the EcIA as appropriate).</li> <li>- The LMP is intended to apply to both the resource consents and wildlife approval. The LMP is referred to in detail in the resource consent conditions and will also be referred to in the wildlife approval conditions. The LMP is being submitted for approval by the FTAA panel, so it can attach in its approved form to the wildlife approval (and resource consents).</li> <li>- The LMP has been prepared to reflect the recommendations in the EcIA, and the requirements of the conditions.</li> </ul> <p>For ease of reference, WIAL and Bioreserches are happy to replicate section 7 of the EcIA in the LMP.</p>

Technical report / document	Comments by DOC	WIAL's response
	<p>relevant information that is located within the EcIA should then be transferred into the LMP so that all information required as per the FTA Schedule 7 clause 2(1) is consolidated into a single report for wildlife approval assessment purposes. This would be DOC's preference as it would allow for the conditions to enforce the LMP.</p>	
	<p>Confirmation of landowner approval is required where off-site</p>	<p>WIAL will formally be seeking Reserves Act approval for Project-related activities on WCC-controlled Reserve land in the overall FTAA application.</p>

Technical report / document	Comments by DOC	WIAL's response
	<p>relocations are to occur, and additional landowners are involved. Please provide confirmation that WCC or the relevant landowner at Moa Point Reserve has approved the proposal to receive salvaged lizards from Moa Point Yard.</p>	<p>WIAL is liaising closely with WCC in respect of the use of WCC-controlled Reserve land for the Project, and the related FTAA processes. That has included the Council specifically delegating authority to staff in respect of Reserves matters related to the Project.</p> <p>WIAL and WCC are working to confirm whether the proposed lizard relocation will be subject to the FTAA application, or a separate Reserves Act process.</p> <p>WIAL will keep DOC informed in respect of these matters, which will also be explained in detail in the FTAA application.</p>
<p>Terrestrial Ecology Conditions</p>	<p>ECO.2 (Review of LMP): Consider alignment with 'Variation' condition supplied by DOC 01/10/2025</p>	<p>Noted.</p> <p>For completeness, any review and update of the LMP will be subject to the certification conditions.</p>
	<p>ECO.3 (LMP objectives): Recommend this include further information about the effects management hierarchy; Avoid, minimise, mitigate and offset/compensate potential adverse effects on native lizards within construction footprint AND at receiving site.  Consider rewording or removing (b), which relates to maintaining or enhancing the population of each lizard species.</p>	<p>The condition will be updated to:</p> <ul style="list-style-type: none"> <li>- more specifically reflect that the proposed lizard relocation is to avoid / mitigate direct harm effects on lizards;</li> <li>- clarify that the efforts re maintaining / enhancing lizard populations are focussed on the relocation site(s); and</li> <li>- delete reference to completing habitat enhancement before any lizards are released.</li> </ul>

Technical report / document	Comments by DOC	WIAL's response
	Delete reference in (c)(ii) to habitat enhancement work being completed prior to the release of any lizards.	
	ECO.4 (LMP inclusions): DOC's preference would be for all information relating to the wildlife approval (and relevant FTA information requirements) be contained in the LMP	Noted – section 7 of the EcIA addressing wildlife approval requirements will be replicated in the LMP.
	ECO.9 (lizard survey and salvage timing): consider reworking (b) to provide greater clarity of how timing of trapping and vegetation clearance activities align	On reflection, WIAL considers the interaction between survey and salvage operations and clearance activities is best addressed in the LMP – the condition can be reworked accordingly.
	ECO.18 (report on annual lizard relocation site survey):  Report to be submitted by 30 June each year for the life of the Approval. Consider alignment with 'Lizard Salvage Reporting' standard condition supplied by DOC 01/10/2025	Agreed that requiring the report to be provided by a fixed date (30 June) is appropriate.