

Memorandum on Completeness and Scope

File	FTAA-2607-1272
Application	State Highway 1 Wellington Improvements
To	Manager LOA/ Team Leader LOA
From	
Date	7 September 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the State Highway 1 Wellington Improvements application, lodged by New Zealand Transport Agency Waka Kotahi (the Applicant), and received by the Fast-track Team on 14 August 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Application is a listed project.
6. The Application was lodged on 14 August 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive

application complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was subject to a further information request, therefore the date by which the EPA must make a decision under section 46 is 7 September 2026.

7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The project is described in Schedule 2 of the Act as:
“Improve State Highway 1 between north of the Terrace Tunnel and Kilbirnie, including associated infrastructure and connections.”
9. The approximate geographical location is identified in Schedule 2 of the Act as:
“North of Terrace Tunnel to Kilbirnie, Wellington City.”
10. The project is described in section 6.1, p.7 of Part A.02 of the application as:
“The Project is a Road of National Significance (RoNS) which improves SH1 in Wellington City. The proposal includes the construction, operation and maintenance of improvements to SH1, extending approximately 5 km through the city from north of the Terrace Tunnel to near the intersection of Cobham Drive and Evans Bay Parade in Kilbirnie. The Project will improve efficiency and reliability on SH1 by providing second tunnels at The Terrace and Mount Victoria, a new layout at the Basin Reserve and widening, intersection upgrades and layout improvements along the remainder of the SH1 corridor, as illustrated on Figure 1 below. The Project aims to attract traffic onto SH1, reduce traffic on other key routes, unblock critical bottlenecks on the state highway, maintain access for local movements and enable public transport growth.”
11. The application relates solely to the listed project because the activities described in the application, and the location of those activities, are in line with the description in Schedule 2 of the Act.
12. Greater Wellington Regional Council have raised that the location of compensation activities at Mātai Moana Reserve may pose a scope issue. Although the proposed compensation activities are located outside of the “approximate geographical location” of the project as described in Schedule 2 (see section 6.8.5, p.145-146 of Part B.01, and p.26-27 of Part F.11 of the application), the applicant has stated that no suitable wetland offset sites were found within or near the project area, and compensation activities at Mātai Moana Reserve are necessary to address residual wetland effects caused by the project. Given this information, it is my view that these activities are within the definition of ‘project’ in section 4 of the Act, being that they are activities that support and are subsidiary to the project.

Fast-track consenting application process

Legislative context

13. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
14. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

15. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
16. This application has been lodged by New Zealand Transport Agency Waka Kotahi. This person is an authorised person under the Act as per the listing in Schedule 2 of the Act.
17. The approvals being sought are:
 - an approval described in section 42(4)(a), (c) or (d) (resource consent, certificate of compliance or designation);
 - o A resource consent, change to or cancellation of a resource consent: **checklist A**;
 - o A designation or an alteration to an existing designation: **checklist C**;
 - an approval described in section 42(4)(h) (wildlife approval), **checklist E**;
 - an approval described in section 42(4)(i) (archaeological authority), **checklist F**;
18. All of the above listed approvals are of the type set out in section 42(4) of the Act
19. For each of the approvals sought, the applicant is/is not eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

20. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

21. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
22. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
23. As set out in more detail in Appendix 2, Wellington City Council and Greater Wellington Regional Council have advised that the information required by section 44 is provided in insufficient detail to satisfy the purpose for which it is required, whereas the Department of Conservation and Heritage New Zealand Pouhere Taonga have found the information to be sufficient.

Ineligibility

24. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
25. The list of ineligible projects includes activities:
 - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
 - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
 - within an aquaculture settlement area without the required authorisation;
 - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
 - that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or

- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
 - That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
 - That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
 - That are undertaken for the purposes of an offshore renewable energy project.
26. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Notification by applicant

27. Pre-lodgement requirements for a listed project require the applicant to notify in writing the persons and groups referred to in section 29(1)(aa). The persons and groups notified have 20 working days to respond from the date of the notice. The applicant must not lodge their substantive application until each 20 working day period has elapsed.
28. I have checked and reviewed the dates of notification sent to the persons or groups in section 29(1)(aa) and confirmed that the application has lodged their application only after each 20 working day period has elapsed.

Fees and levies

29. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST; and
 - Levy in the sum of \$140,000 plus GST.

Consultation

30. I have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- Wellington City Council and Greater Wellington Regional Council for:
 - i. an approval described in section 42(4)(a) (resource consent)
 - ii. an approval described in section 42(4)(d) (designation)
 - The Department of Conservation for:
 - i. an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
 - Heritage New Zealand Pouhere Taonga for an approval described in section 42(4)(i) (archaeological authority);
31. A summary of the consultation is included as Appendix 2.

Requests for further information

32. I requested further information from the applicant under section 46(2A) on 2 September 2026 in relation to several matters. The applicant responded with the information on 3 September 2026 within the 20- working timeframe afforded by section 46(2B). A full copy of the request and response can be found in Appendix 3.

Assessment of compliance for each section of each application form

33. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
34. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
35. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
36. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	The State Highway 1 (SH1) Wellington Improvements project (the Project) is a Road of National Significance which improves SH1 in Wellington City. The proposal includes the construction of improvements to SH1 within Wellington City from north of the Terrace Tunnel to Kilbirnie. The Project will provide for more efficient and reliable access on SH1 and includes duplicate tunnels at The Terrace and Mount Victoria, a new layout at the Basin Reserve as well as improvements along the remainder of the SH1 corridor from north of the Terrace Tunnel to the intersection of Cobham Drive and Evans Bay Parade. The Project aims to unblock critical bottlenecks on	Yes, addressed. See also section 6.1, p.7-8 of Part A.02.

		the state highway, maintain access for local movements and enable public transport growth. Refer to Part B.01 - Application for approvals relating to the Resource Management Act 1991, Section 3 Description of the Project for a more detailed description of the proposed activity.	
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and	Part B.03 - Appendix B, (Areas relating to RMA approvals) provides a map of the site. Part B.01 confirms the activity is not located within nga rohe moana o nga hapu o Ngati Porou or a protected customary rights area but is within a statutory area as detailed in sections 7.2 Marine and Coastal Area (Takutai Moana) Act 2011 (MACA) applicants and Section 7.3 Relevant iwi authorities, hapu and Treaty Settlement entities.	Yes, addressed. See also Figure 1, p.8 of Part A.02 for a map of the project. A description and map of the compensation activities proposed at Mātai Moana Reserve is provided on p.26-27 of Part F.11.

	Coastal Area (Takutai Moana) Act 2011		
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.	Yes, as detailed on the General pre-lodgement requirements form.	Yes, addressed. The answer on this form acts as confirmation. This is also more clearly stated in section 2.2, p.4 of Part C.01.
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner	Part H.02 - Properties to which the application relates. Part H.03 – Properties adjacent to land to which the application relates. Occupier details are provided where available. NZTA made reasonable efforts to identify occupiers by seeking information from property owners and also sending letters to the physical address of the properties as detailed in	Yes, addressed. As referenced.

	and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).	Part B.01, sections 7.6.1 and 7.7.1 of the application documents.	
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	Part A.02 – Project overview and benefits, Section 7 – Approvals sought sets out all approvals sought to authorise the Project. Further details are contained in Parts B.01, C.01, D.01 and E.01. Relevant permitted activities are described in Part B, Section 5.	Yes, addressed. Compensation activities related to terrestrial gully habitat restoration at Mātai Moana Reserve are described in section 6.8.5, p.145-146 of Part B.01. More information is provided on p.26-27 of Part F.11.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	Part B.01 - Application for approvals relating to the Resource Management Act 1991, Section 5 sets out all RMA approvals sought for the Project.	Yes, addressed. The applicant confirms in section 5, p.65 of Part B.01 that “ <i>For the avoidance of doubt, NZTA seeks all necessary RMA approvals to construct, operate and maintain the Project as described in this section of the Application and/or as otherwise identified through the consenting process for the Project.</i> ”

			An updated version of Table 17 from Part B of the application, which specifies the resource consents sought, is included as Appendix 2 to the Applicant's response to the request for information.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	Refer to Part B.01 - Application for approvals relating to the Resource Management Act 1991- Section 8.6.4 Part 2 RMA Assessment	Yes, addressed. From p.304.
5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement:	Part B.01 Application for approvals relating to the Resource Management Act 1991 Section 8 – Statutory Assessment - provides an assessment of objectives and policies. A full analysis of the applicable national environmental standards, district and regional plan rules is provided in the Part B.06 (Appendix E) document.	Yes, addressed. See section 8, p.276 of Part B.01, and Part B.06.

	• a regional policy statement or proposed regional policy statement; • a plan or proposed plan; • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.		
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including—	Refer to Part B.01 - Application for approvals relating to the Resource Management Act 1991 - Section 7.3.1	Yes, addressed. In addition to the information in Part B.01, see the applicant's response to the

	(i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area		request for information, from paragraph 6.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	There are no relevant protected customary rights groups or customary marine title groups. The relevant applicant groups (including for both protected customary rights as well as customary marine title) are listed in Part B.01 - Application for approvals to RMA, Section 7.2 – Marine and Coastal (Takutai Moana) Act 2011 (MACA) applicants.	Yes, addressed. Page 251.
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	The proposed conditions are included in Part B.02 (Appendix A - Proposed Conditions).	Yes, addressed.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,—	There are no existing resource consents for the same activity. Refer Part B.09	Yes, addressed.

	(i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	(Appendix H - Section 30 Notice) document.	The section 30 notice is dated 27 July 2026, and the application was lodged within 3 months of this date (14 August 2026). GWRC have confirmed that the notice remains current as of 17 August 2026.
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	Refer to Part B.01 - Application for approvals relating to the RMA, Section 6 and the specialist reports in Part F of the application documents.	See below.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	Refer to Part B.01 - Application for approvals relating to the RMA - Section 6, plus the Technical Specialist Assessment Reports in Part F.	See below.
6	(1) The assessment of an activity's effects on the environment must include the following information:	Part B.01 - Application for approvals relating to the RMA - Section 6 - Assessment of Effects on Environment,	Yes, addressed. a) See section 6, from p.76 of Part B.01.

	(a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including	Section 7 – Engagement and Consultation, Section 8.6 (for ss105 and 107 assessment) and Technical Specialist Assessment Reports in Part F. Also, and the conditions in Part B.02.	b) See the applicant’s response to the request for information, from paragraph 13. - c)(i) See section 8.6.2, from p.301, section 6.8, from p.143, section 6.9, from p.149, and section 6.15, from p.185 of Part B.01. - c(ii) See the applicant’s response to the request for information, from paragraph 21. d) Mitigation measures are addressed throughout section 6, from p.76 of Part B.01. e) See Part B.07, B.08, H.01, H.02, H.03, and section 7 from p.250 of Part B.01. f) N/A. g) See paragraphs 27-29, and Appendix 1 of the applicant’s response to the request for information.
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	safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by		h)Addressed, (N/A). See section 7.2, p.251 of Part B.01.
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	whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic,	Part B.01 - Application for approvals relating to the RMA - Section 6 - Assessment of Effects on Environment, and Technical Specialist Assessment Reports in Part F.	Yes, addressed. a) See sections 6.16 and 6.17 from p.191 of Part B.01, Part F.03, and Part F.19-F.21. b) See section 6.4, from p.101 of Part B.01, and Part F.07. c) See sections 6.7-6.9, from p.136, section 8.3.4, from p.289 and section 8.3.11, from p.295 of B.01, and Part F.10-F.12.1. d) Throughout section 6, from p.76. e) See section 8.6.2, from p.301, section 6.8, from p.143, section 6.9, from p.149, and section 6.15, from p.185 of Part B.01, as well as the applicant's response to the

	recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.		request for information, from paragraph 21. f) See section 6.3, from p.91 of Part B.01. g) Addressed. See section 8.3.8, p.294 of Part B.01, and the applicant's response to the request for information, from paragraph 13.
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that	Part B.01 - Application for approvals to RMA, Section 5.3 and Appendix E.	Yes, addressed. From p.23 of Part B.06 - Appendix E.

	activity under section 87A(1) of the Resource Management Act 1991)		
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	The activity will not occur within a customary marine title group under section 85 of the MCAA or within nga rohe moana o nga hapu o ngati porou. See Part B.01 - Application for approvals to RMA, Section 7.2.	Yes, addressed (N/A).
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	The activity does not occur within any such areas.	Yes, addressed (N/A).

CHECKLIST C – Designation or alteration of existing designation

Clause, Schedule 5	Information required for an approval described in section 42(4)(d) of the Act, Clause 12 of Schedule 5	Application Reference	EPA
12(1)(a)	a description and map of the site to which the notice of requirement applies, including whether the site is within or adjacent to a statutory area (as defined in a relevant Treaty settlement Act)	Part B.01 - Application for approvals relating to RMA, Section 1 - Project overview, and Designation Plans as part of the Part G Drawing Set and Part B.01, Section 7.3 describes and shows relevant statutory acknowledgement areas.	Yes, addressed. See section 5.1, from p.65 of Part B.01 - Application for approvals relating to RMA for a description. See Part.B.03 – Appendix B for maps showing current and proposed designation areas. See section 7.3.2, p.252-253 for description and map of statutory area in relation to the designation.
12(1)(b)	information on the effects of the proposed project or work on the environment, together with a description of how any adverse effects will be mitigated	Part B.01 - Application for approvals relating to RMA, Section 6 Assessment of Effects on the Environment.	Yes, addressed. Both effects and mitigation are addressed throughout section 6, from p.76 of Part B.01 - Application for approvals relating to RMA.

12(1)(c)	confirmation that the notice of requirement complies with section 46(2)(a), (b), and (d), being; • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; • any fee, charge, or levy payable under regulations in respect of the application is paid.	This is included in the Substantive Application Forms, Part 2: General pre-lodgement requirements.	Yes, addressed. The answer on this form acts as confirmation. This is also more clearly stated in section 2.2, p.4 of Part C.01.
12(1)(d)(i)	an assessment of the project or work against sections 5, 6, and 7 of the Resource Management Act 1991	Refer to Part B.01 - Application for approvals relating to the Resource Management Act 1991 - Section 8.6.4 Part 2 RMA Assessment.	Yes, addressed. From p.304.
12(1)(d)(ii) and 12(2)	an assessment of the project or work against any relevant provisions in any of the documents listed in subclause (2) being: (a) a national policy statement: (b) a New Zealand coastal policy statement: (c) a regional policy statement or proposed regional policy statement:	Refer to Part B.01 - Application for approvals relating to the Resource Management Act 1991- Section 8 – Statutory Assessment.	Yes, addressed. See section 8, p.276 of Part B.01, and Part B.06 .

	(d) a plan or proposed plan: (e) a planning document recognised by a relevant iwi authority and lodged with a local authority.		
12(1)(e)	information about any Treaty settlements that apply in the area to which the substantive application relates, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the area to which the substantive application relates	Refer to Part B.01 - Application for approvals relating to the Resource Management Act 1991, Section 7.3.1	Yes, addressed. In addition to the information in Part B.01, see the applicant's response to the request for information, from paragraph 6.
12(1)(f), 12(3) and 12(4)	the full name and address of— (i) each owner of the land to which the notice of requirement relates and of the land adjacent to that land; and (ii) each occupier of the land to which the notice of requirement relates and of land adjacent to that land whom the requiring authority is able to identify after reasonable inquiry; and If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land	Part H.02 - Properties to which the application relates. Part H.03 - Properties adjacent to land to which the application relates. Occupier details are provided where available. NZTA made reasonable efforts to identify occupiers by seeking	Yes, addressed.

	adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 12(3)).	information from property owners and also sending letters to the physical address of the properties as detailed in Part B.01, sections 7.6.1 and 7.7.1 of the application documents.	
12(1)(g)	an assessment of whether the project or work and the designation sought are reasonably necessary for achieving the objectives of the requiring authority	Part B.01 - Application for approvals relating to RMA, Section 8.7.5	Yes, addressed. From p.310.
12(1)(h)	any consideration of alternative sites, routes, or methods of undertaking the project or work	Part B.01 - Application for approvals relating to RMA, Section 8.7.4	Yes, addressed. From p.307. See also Part F.01.
12(1)(i)	a list of the resource consents needed for the project or work and whether they have been applied for	Part B.01 - Application for approvals relating to the RMA, Section 5.2 - Resource consents sought	Yes, addressed. The applicant confirms in section 5, p.65 of Part B.01 that <i>“For the avoidance of doubt, NZTA seeks all necessary RMA approvals to construct, operate and maintain the Project as described in this section of the Application and/or as otherwise</i>

			<i>identified through the consenting process for the Project.”</i> An updated version of Table 17 from Part B of the application, which specifies the resource consents sought, is included as Appendix 2 to the Applicant’s response to the request for information.
12(1)(j)	a description of any consultation undertaken with parties likely to be affected by the project or work and the designation	Part B.01 - Application for approvals relating to the RMA, Section 7 - Engagement and Consultation	Yes, addressed. From p.250. See also Appendix F2 and F3, from p.4 of Part B.07.
12(1)(k)	any conditions that the requiring authority proposes for the designation.	The proposed conditions are included in Part B.02 (Appendix A - Proposed Conditions).	Yes, addressed.

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	Refer to Part D.01 - Application for Wildlife Approval (Lizards), Section 2 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 2	Yes, addressed. As referenced.
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)	Refer to Part D.01 - Application for Wildlife Approval (Lizards), Section 3 and Part E.01 - Application for Wildlife Approval (Little	Yes, addressed. As referenced. See also section 8 of both Part D.01, and Part E.01.

		Penguins/Korora), Section 3	
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	Refer to Part D.01 - Application for Wildlife Approval (Lizards) and Section 4 Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 4	Yes, addressed. As referenced.
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Refer to Part D.01 - Application for Wildlife Approval (Lizards), Section 5 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 5	Yes, addressed. As referenced.

2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	Part D.01 - Application for Wildlife Approval (Lizards), Section 6 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 6	Yes, addressed. As referenced. See also section 11 of both Part D.01 and Part E.01.
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	Part D.01 - Application for Wildlife Approval (Lizards), Section 7 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 7	Yes, addressed. As referenced.
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Part D.01 - Application for Wildlife Approval (Lizards), Section 8	Yes, addressed. For lizards, see section 4.8 of Part F.10.1 (Lizard Management Plan).

		and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 8	For kororā, see section 3.4.8.2 of Part F.12.1 (Kororā Management Plan).
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	Part D.01 - Application for Wildlife Approval (Lizards), Section 9 and Part D.02 Appendix A - Map showing areas for Approvals (Lizards) and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 9 and Part E.02 Appendix A - Map showing areas for Approvals (Little Penguins - Kororā)	Yes, addressed. Note that references to Part D.02 and Part E.02 are to Appendix A of both Part D.01 and Part E.01.

2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Part D.01 - Application for Wildlife Approval (Lizards), Section 10 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 10	Yes, addressed. As referenced.
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Part D.01 - Application for Wildlife Approval (Lizards), Section 11 and Part F - Technical Report #10 - Terrestrial Ecology and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 11 and Part F - Technical Report #12 - Marine Ecology	Yes, addressed. As referenced.

2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Part D.01 - Application for Wildlife Approval (Lizards), Section 11 and Part F - Technical Report #10 - Terrestrial Ecology and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 11 and Part F - Technical Report #12 - Marine Ecology	Yes, addressed. As referenced.
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	Part D.01 - Application for Wildlife Approval (Lizards), Section 12 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 12	Yes, addressed. As referenced.

2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Part D.01 - Application for Wildlife Approval (Lizards), Section 12 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 12	Yes, addressed. As referenced.
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	Part D.01 - Application for Wildlife Approval (Lizards), Section 13 and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 13	Yes, addressed. As referenced. See also Part B.07, B.08, and section 7, from p.250 of Part B.01.
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	Part D.01 - Application for Wildlife Approval (Lizards), Section 14	Yes, addressed. As referenced.

		and Section 11 and Part F - Technical Assessment #10 - Terrestrial Ecology and Part E.01 - Application for Wildlife Approval (Little Penguins/Korora), Section 14 and Section 11 and Part F - Technical Assessment #12 - Marine Ecology	
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CHECKLIST F – Archaeological authority

Clause, Schedule 8	Information required for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	EPA
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2(1)(a)	a legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates	Part C.01 – Approvals relating to the HNZPTA, Section 2, Appendix A and Appendix B	Yes, addressed. As referenced.
2(1)(b)	the name of the owner of the relevant land, if the applicant is not the owner of the land	Part C.01 – Approvals relating to the HNZPTA, Section 2 and Appendix A	Yes, addressed. As referenced.
2(1)(c)	proof of consent, if the owner of the relevant land has consented to the proposed activity	Refer Part C.01– Approvals relating to the HNZPTA, Section 2.1 NZTA has not yet obtained all landowner consents.	Yes, addressed. As referenced. Landowner consent is still in progress.
2(1)(d)	confirmation that the application complies with section 42 , 43, and 44 of the Act	Part C.01 – Approvals relating to the HNZPTA, Section 2.2	Yes, addressed. As referenced.
	confirmation that the application relates solely to a listed project or a referred project	Part C.01 – Approvals relating to	Yes, addressed. As referenced.

		the HNZPTA, Section 2.2	
	any fee, charge, or levy payable under regulations in respect of the application is paid.	Part C.01 – Approvals relating to the HNZPTA, Section 2.2	Yes, addressed. The application fee and levy have both been paid.
2(1)(e)	a description of each archaeological site to which the application relates and the location of each site	Part F.09 – Technical Report 9 - Archaeological Assessment. Specifically, Section 6 of Technical Assessment Report #9 (Archaeological Assessment) sets out the recorded archaeological sites and potential archaeological sites to which this application relates, and provides a description of each	Yes, addressed. See p.64-88 of Part F.09.

		site.	
2(1)(f)	a description of the activity for which the authority is sought	Part B.01 – Approvals relating to the RMA, Section 3 provides a detailed description of the Project including earthworks. Project drawings are in Part G of the application.	Yes, addressed. See section 2.4, from p.5 of Part C.01.
2(1)(g)	a description of how the proposed activity will modify or destroy each archaeological site	Part F.09 – Technical Report 9 - Archaeological Assessment. Specifically, section 7 of Technical Assessment Report #9 (Archaeological Assessment) sets out the known and potential archaeological features and the	Yes, addressed. See section 2.4, from p.5 of Part C.01, and section 5, from p.89 of Part F.09.

		expected effects	
2(1)(h)	except in the case of an approval described in section 44(b) of the HNZPT Act, an assessment of— (i) the archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and (ii) the effect of the proposed activity on those values	Part F – Technical Reports. Specifically, this information is provided in Technical Reports #9 #19 and #20	Yes, addressed. See p.64-93 of Part F.09 for archaeological values, and effects. Part F.19 and Part F.20 provide insight into Māori values and the effects on those values, with p.16-17 of Part F.20 providing information about the Hauwai Cultivation Area specifically.
2(1)(i)	a statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected— (i) has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or (ii) has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable).	Part C.01 – Approvals relating to the HNZPTA, Section 2.5	Yes, addressed. As referenced.

CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA
13(4)(a)	a description of the project and the activities it involves	Part B.01 – Application for approvals relating to RMA – Section 3.	Yes, addressed. See also section 6.1, from p.7 of Part A.02.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	Part A.02 – Project Overview and Benefits – Section 8	Yes, addressed. Written approval from the Trust appointed to manage the reserve that the Applicant intends to undertake compensation works on is on p.28 of B.07 – Appendix F.
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	Part H.01 being all areas over which approvals are sought (RMA, wildlife and archaeological)	Yes, addressed.

13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	Construction commencement for the Project is subject to funding availability. Indicatively, construction may take place within the 2027-2038 National Land Transport Plan (NLTP) periods, subject to funding decisions, or potentially it could be later than this. Notwithstanding this, having approvals in place by 2027 will enable the Project to be implementation ready, when funding is confirmed. Securing consents and the alteration to the designation by 2027 will also provide for route protection and certainty on its location and form.	Yes, addressed. See section 4.1 and 4.2, from p.49 of Part. B.01.
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	Decisions on implementation methods have not been made as this is subject to future funding decisions.	Yes, addressed. See section 4.1 and 4.2, from p.49 of Part. B.01.

		Accordingly, assumptions have been made through development of an indicative construction methodology, to enable assessment of construction effects. The approvals sought are for the entirety of the Project.	
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects	Part B.01 Application for approvals to RMA – Section 6	Yes, addressed. From p.76.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	No project activities are prohibited activities.	Yes, addressed. As per statement on this form.
13(4)(j)	a list of the persons and groups the applicant considers are likely to be affected by the project, including— (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements:	(i) Wellington City Council and Greater Wellington Regional Council (ii) N/A (iii) and (iv) Taranaki Whānui ki Te Upoko o Te Ika (Taranaki Whānui), represented by Port Nicholson Block Settlement Trust and Ngāti Toa	Yes, addressed. As per information on this form. See also section 7, from p.250 of Part B.01.

	(iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:	Rangatira (Ngāti Toa), represented by Te Rūnanga o Toa Rangatira Incorporated (v) N/A (vi) N/A (vii) Te Rūnanga o Toa Rangatira Inc (the Rūnanga) (on behalf of Ngāti Toa Rangatira) and Te Ātiawa ki te Upoko o te Ika a Māui Pōtiki Trust (Te Ātiawa Trust)(on behalf of Te Ātiawa, which is affiliated with Taranaki Whānui) (viii) Refer to Part H.02 - Schedule 1: Properties to which the application relates	
13(4)(k)	a summary of— (i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and	Part B.01 Application for approvals to RMA –Section 7	Yes, addressed. See also Part B.07, Part B.08, Appendix C of Part C.01, Appendix B of Part D.01, and Appendix B of Part E.01.

	(ii) how the consultation has informed the project:		
13(4)(ka)	a summary of how any responses provided to the notification under section 29(1)(aa) have informed the project	Part B.01 Application for approvals to RMA –Section 7 covers NZTA's engagement with mana whenua. Part B.08 (Appendix G) includes NZTA's responses to its pre-lodgement engagement with WCC and GWRC	Yes, addressed. Consultation and feedback from from WCC and GWRC are addressed in Part B.08. Consultation and feedback from iwi authorities and Treaty settlement entities are addressed in section 7.3, from p.252 of Part B.01. See also Part F.19 and Part F.20. Consultation and feedback from HNZPT and DOC are addressed in section 7.5, from p.258 of Part B.01, and in Appendix C of Part C.01, Appendix B of Part D.01, and Appendix B of Part E.01.
13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	Part B.01 Application for approvals to RMA sections 7.3.1 and 7.3.2	Yes, addressed. In addition to the information in Part B.01, see the applicant's response to the request for information, from paragraph 6.

13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	Part B.01 Application for approvals to RMA – Section 1.2	Yes, addressed. From p.12.
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	The project is not within nga rohe moana o nga hapu o ngati porou	Yes, addressed (N/A).
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	There is no Maori land within the project area, however, Part F Technical Assessments #19 and #20 (Cultural Impact Assessments) provide information on wahi tapu and sites of significance within the project area.	Yes, addressed. See p.16-18 of Part F.20.
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	the applicant is not seeking such a determination	Yes, addressed (N/A).
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of—	the applicant is not seeking such a determination	Yes, addressed (N/A).

	(i) the scale and adverse effects of the existing electricity infrastructure; and (ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure		
13(4)(r)	a statement of whether the applicant is seeking a determination under section 24(4) and, if so,— (i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and (ii) for each alternative site considered,— (A) a statement of the anticipated and known financial cost of undertaking the activity; and (B) a description of the anticipated and known adverse effects of undertaking the activity; and (C) a description of the anticipated and known financial cost and practicality of	the applicant is not seeking such a determination	Yes, addressed (N/A).

	available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and (D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and (E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	Part B.01 Application for approvals to RMA – Section 1.2 and and Part H.02 Properties to which the application relates	Yes, addressed. From p.12.
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations	Part B.01 Application for approvals to RMA – Section 5	Yes, addressed. The applicant confirms in section 5, p.65 of Part B.01 that “ <i>For the</i>

	or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant		<i>avoidance of doubt, NZTA seeks all necessary RMA approvals to construct, operate and maintain the Project as described in this section of the Application and/or as otherwise identified through the consenting process for the Project.”</i> See also paragraphs 30-38 of the applicants response to the request for information. An updated version of Table 17 from Part B of the application, which specifies the resource consents sought, is included as Appendix 2 to the Applicant’s response to the request for information.
13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application:	The project does not involve such activities.	Yes, addressed (N/A).

	(ii) if a decision has been made, the outcome of the decision and the reasons for it:		
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	Part B.01 Application for approvals to RMA - Sections 6.10.2, 6.12.2, Section 8.1.1, 8.3.1, 8.3.3, 8.3.8 and 8.3.12 and 8.6.1.	Yes, addressed.
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	The application is for the approvals to be held by NZTA	Yes, addressed. The application was lodged by only one person (NZTA), who is the authorised person in Schedule 2 of the Act.
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	Part A.02 Project Overview and Benefits Document – Section 3.3.	Yes, addressed. Page 6.
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		

13(4)(y)(i), clause 2 of Schedule 5	Resource consent or designation (a) an assessment of the project against— (i) any relevant national policy statement; and (ii) any relevant national environmental standards; and (iii) if relevant, the New Zealand Coastal Policy Statement; and	Part B.02 Application for approvals to RMA – Section 8.1, 8.2, 8.3, 8.4.	Yes, addressed. See section 8, p.276 of Part B.01, and Part B.06.
	(b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant’s knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).	Refer Part B.09 – Appendix H Section 30 Notice	Yes, addressed. GWRC have confirmed that the notice remains current as of 17 August 2026.
13(4)(y)(ii), clause 3 of Schedule 5	Change or cancellation of resource consent condition The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.	The application is not to change or cancel any conditions of any existing resource consents	N/A

13(4)(y)(iii), clause 4 of Schedule 5	Certificate of compliance The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.	The application is not for a certificate of compliance	N/A
13(4)(y)(iv), clause 2 of Schedule 6	Concession (1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and— (a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (b) the granting of the lease would trigger a right of first refusal or a right of offer or return. (2) Confirmation that the applicant has written agreement from the holder of the right of first	The application is not for a concession	N/A

	refusal or right of offer or return to waive that right for the purposes of the proposed lease.		
13(4)(y)(v), clause 23 of Schedule 6	Land exchange (1) The information required to be provided under section 13(4)(y)(v) is (a) - (e) below: (a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:	The application is not for land exchange	N/A
	(b) the financial value of the land proposed to be acquired by the Crown:	The application is not for land exchange	N/A
	(c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate: <i>Guidance note: This must include an explanation of why the exchange would benefit the conservation estate; and details of anything registered or noted for conservation purposes on the record of title for the land to be acquired by the Crown (clause 23(1A) of Schedule 6)</i>	The application is not for land exchange	N/A

	(d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:	The application is not for land exchange	N/A
	(e) confirmation by the applicant that no part of any land to be exchanged by the Crown is – (i) land listed in Schedule 4; or (ii) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977	The application is not for land exchange	N/A
13(4)(y)(vi), clause 4A of Schedule 5	Standard freshwater fisheries activity approval (4A) The information required to be provided under section 13(4)(y)(vi) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which the proposed structure may impede fish passage; and	The application is not for a standard freshwater fisheries activity	N/A

	(b) whether any fish salvage activities are proposed.		
13(4)(y)(via), clause 2 of Schedule 9	Complex freshwater fisheries activity approval (2) The information required to be provided under section 13(4)(y)(via) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and (b) whether any other complex freshwater fisheries activities are proposed.	The application is not for a complex freshwater fisheries activity	N/A
13(4)(y)(vii), clause 2 of Schedule 10	Marine consent (1) The information required to be provided under section 13(4)(y)(vii) is— (a) information about whether the Minister of Conservation is an affected person:	The application is not for a marine consent	N/A
	(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,—	The application is not for a marine consent	N/A

	(i) details of any application made; and (ii) the decisions made on that application; and (iii) information about the matters that the Minister may consider under section 22(6):		
	(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.	The application is not for a marine consent	N/A
13(4)(y)(viii), clause 2 of Schedule 11	Access arrangement (1) Confirmation that the applicant has complied with section 29 (for the purposes of section 13(4)(y)(viii)).	The application is not for an access arrangement	N/A

13(4)(y)(ix), clause 15 of Schedule 11	Mining permit (1) For the purposes of section 13(4)(y)(ix), the information is— (a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral: (b) the name and contact details of the proposed permit participants and the proposed permit operator: (c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both: (d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme: (e) information about the proposed permit holder's history of compliance with mining or similar permits and their conditions:	The application is not for a mining activity	N/A
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	(f) the proposed date on which the substantive application is intended to be lodged: (g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information: (h) the proposed duration of the permit: (i) if the proposed approvals include a mining permit for petroleum,— (i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates: (ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System: (iii) a high-level overview of the following:		
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	(A) the proposed field development plan: (B) the proposed date for the commencement of petroleum production: (C) the economic model for the project: (D) the proposed duration of the proposed mining permit: (E) decommissioning plans: (j) if the proposed approvals include a mining permit for minerals other than petroleum,— (i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates: (ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted:		
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	(iii) whether the application will be for a Tier 1 or Tier 2 permit: (iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology): (v) an indicative mine plan: (vi) a high-level overview of the following: (A) the proposed mining method: (B) the proposed date for the commencement of mining and estimated annual production: (C) the economic model for the project: (D) the status of or anticipated timing for completing any prefeasibility or feasibility studies: (E) the proposed methods for processing mined material and handling and treating waste:		
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	(F) anticipated plans for mine closure and rehabilitation. (2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.		
43(2)(b)	if the project is planned to proceed in stages,— (i) an outline of the nature and timing of the stages; and	The application is not for a mining activity	N/A

	(ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and (iii) an explanation of how each stage meets the criteria in section 22:		
43(2)(c)	the information that the applicant provided to the Minister when applying to have the project listed as a listed project and an explanation of how the substantive application is within the scope of the listed project.	The application is not for a mining activity	N/A

Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. Greater Wellington Regional Council
2. Wellington City Council
3. Department of Conservation
4. Heritage New Zealand Pouhere Taonga

By Fast-track Portal

24 August 2026

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GW File No: FTA270019
EPA File No: FTAA-2607-1272


Fast-track Applications
Environmental Protection Authority
Private Bag 63002
Wellington 6140

Tēnā Koe

Consultation under section 46 of the Fast-track Approvals Act 2024: State Highway 1 Wellington Improvements

Thank you for your letter dated 17 August 2026 requesting that Wellington Regional Council (Greater Wellington) provide feedback on the completeness of the substantive application for the State Highway 1 Wellington Improvements project under section 46 of the Fast-track Approvals Act 2024 (FTAA).

Greater Wellington is providing feedback on the completeness of the application as a consent authority under the Resource Management Act 1991 (RMA).

Completeness

Greater Wellington has considered whether the application includes the information required for resource consent applications under clauses 5, 6, and 7 of Schedule 5 to the FTAA.

Greater Wellington considers that the matters described in **Attachment 1** to this letter have not been addressed or have not been provided in sufficient detail for decision-makers to consider the proposal.

Existing resource consents

You have asked us to confirm that the written notice under section 30(3)(b)/30(5), dated 27 July 2026 (Part B.09 – Appendix H of the application), prepared by Greater Wellington Regional Council remains accurate and final on 17 August 2026.

The substantive application proposes to undertake compensation works on land at Mātai Moana Reserve, Maupuia¹. The land is identified as Section 100 SO 528811 and is shown in **Attachment 2**. Works on this land were not considered as part of notice provided by Greater Wellington on 27 July 2026. Greater Wellington advises that there are no existing resource consents on this land, and that section 30(3)(b) of the FTAA applies to the activities proposed in the substantive application on this land.

The EPA may wish to consider whether works on this land are within the scope of the listing for the project under Schedule 2 of the FTAA.

Should you have any questions about our feedback on completeness and scope, please contact Katherine Greenaway at [REDACTED]

Ngā mihi



Richard Percy
Team Leader
Environmental Regulation

¹ Substantive Application Part B.02 – Appendix A – Proposed Conditions, p.29 and 37.

Attachment 1: Information not included in substantive application for resource consents

Relevant clause(s) in Schedule 5 of the FTAA	Matters that are not addressed or are not provided in sufficient detail for decision-makers to consider the proposal
Clause 6(1)(a)	Groundwater effects – groundwater assessment for Wetland 3 Wetland 3 is located within 100 m of the project designation. The application states Wetland 3 will not be adversely affected by works, but no evidence is provided to support this claim. The application also does not include information on whether earthworks within 100 m of Wetland 3 will affect wetland hydrology.
Clause 6(1)(a) Clause 6(1)(d)	Natural inland wetland effects – application of the effects management hierarchy Submitted material lacks information to demonstrate the applicant has adequately attempted to achieve mitigation at all levels of the effects management hierarchy. Part F.11 - Technical report 11 - Freshwater and Wetland Ecology Assessment, paragraph 92 ii described aquatic offsetting outside the project designation. However, the activities in this paragraph do not constitute offsetting as no “like-for-like” replacement has been proposed. The application does not include sufficient information about whether it is possible to create new wetland extent to mitigate the loss of 885 m² (other than early pre-application documents). The initial proposed offset site accounted for a small proportion of wetlands; the applicant has since determined this to not be hydrologically viable. It is unclear whether no offset is viable, or if total offset for the proposed 885 m² of reclamation is not viable (i.e., offset at a smaller scale is viable).
Clause 6(1)(b)	Use of hazardous installations The application does not describe whether the proposal includes the use of any hazardous installations. Because of this, it is uncertain whether clause 6(1)(b) of Schedule 5 is met.
Clause 6(1)(a)	Public transport effects – bus travel time analysis Part F.05 - TR5 Annexure F provides a 'Detailed assessment of bus journey times' for the Project. While this assessment looks to draw from the <i>SH1WI: Bus travel time analysis July 2026</i> that was recently shared with GWRC on 6 August 2026 (file name: CDMR App F Bus travel time analysis - Draft Final - For Issue) (included in Attachment 3), it differs in both presentation of the information and some content. In our view <i>SH1WI: Bus travel time analysis July 2026</i> provides presentation of the analysis of effects on bus travel time in a way that is clear and easy to understand. In addition, it includes useful location specific commentary on where and why modelled bus travel time delays are being seen, which would be valuable for the Panel to understand and to inform any potential design refinements or mitigations associated with identified bus delays. It would be helpful if the information <i>SH1WI: Bus travel time analysis July 2026</i> was lodged with the Fast Track Application - either in addition, to supplement, or to amend Annexure F - to ensure the impact on bus travel times for the different corridors with

Relevant clause(s) in Schedule 5 of the FTAA	Matters that are not addressed or are not provided in sufficient detail for decision-makers to consider the proposal
	and without the Project is presented as clearly as possible. There are also some discrepancies in the modelled travel time numbers presented between the two documents and it would be useful if the reason could be clarified and/or numbers aligned/updated/consistent as well as the peer review evidence discussed in Paragraph 63 of Part F.05 - TR5 - Integrated Transport Effects.
Clause 6(1)(d)	Public transport effects – proposed designation conditions We consider very strongly that designation conditions should be drafted in conjunction with GWRC and WCC. At a high level: • We do not consider that the proposed conditions are binding as they are subject to changes to Management and Outline Plans as presented in General Conditions DC.1. • There is no consultative process General Conditions DC.3 and DC.4 presented regarding the establishment or amendment of Management or Outline Plans. DC.4: We consider it would be appropriate to include a condition that a Network Management Plan ‘shall be prepared’ in consultation with GWRC and WCC to describe how the post-construction operational impacts and costs of the Project would be managed and set clear objectives for interventions in the road corridor, for example, bus priority and traffic signal optimisation, to support maintaining reliable and efficient bus network travel times. (Part F.05 - TR5 - Integrated Transport Effects para 905.iv) Such a condition should be excluded from condition DC.2 <i>Conditions following completion of construction</i>. DC.5: Relevant amended management plans should be provided to Greater Wellington Regional Council. The proposed Construction Traffic and Transport Management Plan (CTTMP) condition should specifically mention measures to maintain reliable and efficient bus network travel times. Current DC.9 c) ii which currently includes all transport users in one clause could be broken down into separate modes to give each sufficient importance and specificity of outcome sought. DC.9 d) The consultation should be extended to cover amendments to the CTTMP as well as its development. DC.9 e) The CTTMP should be submitted to the Greater Wellington Regional Council as well as to the Wellington City Council
Clause 6(1)(d)	Public transport effects – Network Planning Part F.05 - TR5 - Integrated Transport Effects - Paragraphs 643-645: Whilst an understanding of the role a Network Planning Group (NPG) will play is discussed in Paragraph 643, and that this group has been established, this has not been formalised in Part B.02 - Appendix A - Proposed Conditions.
Clause 6(1)(a) Clause 6(1)(d)	Public transport effects – construction impacts on bus routes Part F.05 - TR5 - Integrated Transport Effects identifies potential construction impacts for the bus network and provides an assessment of modelled journey time analysis

Relevant clause(s) in Schedule 5 of the FTAA	Matters that are not addressed or are not provided in sufficient detail for decision-makers to consider the proposal
	during construction of the ‘potentially more disruptive stages’ of the Project. However, this is based on what is described as an ‘indicative’ or ‘potential’ construction approach(s) elsewhere in the application documentation. While acknowledging the rationale for an indicative approach, we still have concerns that the absence of more detailed or comprehensive construction methodology will make it difficult to robustly understand and seek effective mitigation to manage the construction impacts on the public transport network. The requirement to divert bus services around construction areas will also incur cost in terms of additional timetable hours and kilometres, which are not considered in Part B.02 - Appendix A - Proposed Conditions - DC.9 Construction Traffic and Transport Management Plan. An ‘indicative’ or ‘potential’ construction approach risks understating these costs if the level of disruption cannot be understood in full. One very significant example of this is the intended closure of the Ghuznee Street bridge to traffic in one direction at a time. This is an important bus route and the diversion will necessitate a complete reschedule of multiple Wellington City bus operations. Timetables are designed to make connections between services and significant diversions affect more services than those using the street to be closed. In other words, other timetables that do not necessarily use the Ghuznee Street bridge will be impacted. We note with concern that use of McDonald Crescent as a diversion route is discussed in Annexure G - Section 4 Figs. 1 & 3. This has been discounted as an option for buses in discussion with the NZTA project team and WCC given the steep access from Willis Street and the 'bottoming out' of buses where NZTA's analysis had not made a vertical assessment. Presentation of McDonald Crescent as an option minimises the effect when the reality will be that buses otherwise using Ghuznee Street bridge will need to divert a significant distance via Willis Street and Lambton Quay, Bowen Street and then The Terrace in order to access Salamanca Road. This diversion will add substantially to timetable distance and time requirements.
Clause 6(1)(a) Clause 6(1)(d)	Public transport effects – cumulative effects Part F.05 - TR5 - Integrated Transport Effects - Paragraph 876 notes no attempt to assess the effect of combinations of works along the corridor but rather provides an assumption of that effect. Similar to construction impacts on bus routes (above) we still have concerns that the absence of more detailed or comprehensive construction methodology will make it difficult to robustly understand and seek effective mitigation to manage the construction impacts on the public transport network. Any requirements for diversion of bus services around construction areas will also incur cost in terms of additional timetable hours and kilometres, which are not considered in Part B.02 - Appendix A - Proposed Conditions - DC.9 Construction Traffic and Transport Management Plan.
Clause 6(1)(d)	Public transport effects – mitigations not included in designation conditions Part F.05 - TR5 - Integrated Transport Effects - Table 89: Summary of effects and mitigations: we note mitigations are not included in Part B.02 - Appendix A - Proposed Conditions. We consider this an essential level of detail that the Proposed Conditions should address.

Relevant clause(s) in Schedule 5 of the FTAA	Matters that are not addressed or are not provided in sufficient detail for decision-makers to consider the proposal
Clause 6(1)(d)	Public transport effects – mitigation strategy Part F.05 - TR5 - Integrated Transport Effects and Annexure F identifies positive and negative effects of the Project on bus routes and a few isolated mitigations for public transport. However, we believe a more comprehensive ‘mitigation strategy’ for maintaining or improving public transport performance is required. This should ideally take a wider network integration lens and robustly cover mitigations required as a direct result of project impacts, including those due to traffic re-distribution and access changes. In some cases these are effects are outside the project corridor itself, on the local road network.

Attachment 2: Additional land not considered as part of Greater Wellington's Section 30 notice



Figure 1: area of land where compensation works are proposed to be undertaken within Mātai Moana Reserve, Maupuia.
 Source: Substantive Application Part B.02 Appendix A – Proposed Conditions, p.37.



Figure 2: Extent of Section 100 SO 528811 shown in blue. Approximate location of compensation site indicated by grey circle.
 Source: Land Information New Zealand Data Service.

Attachment 3: *SH1WI: Bus travel time analysis July 2026*

Refer separate PDF attachment.

Public Transport

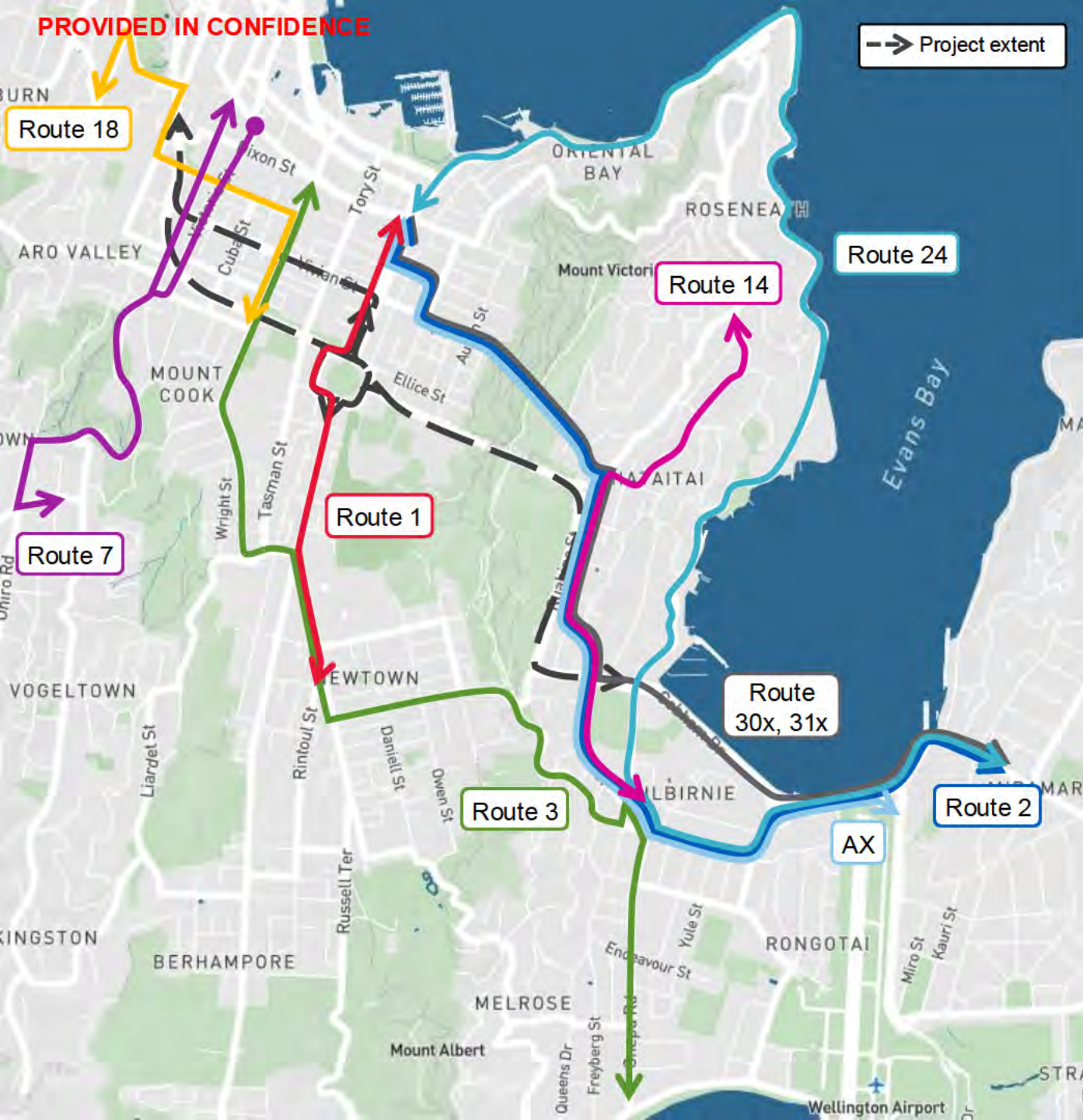
SH1 Wellington Improvements:

Bus travel time analysis

July 2026



PROVIDED IN CONFIDENCE



- The key routes considered in this analysis are shown on the map
- Other routes interfacing with the SH1 corridor include: 4, 17, 23, 25, 27, 29, 32X, 39, HX, school routes
(note, these routes aren't specifically included in the analysis, as they overlap with other core routes that are included)

The analysis includes:

- [Route summary](#)
- [Individual route breakdowns](#)
- [BPAP corridor impacts](#)
- [Travel time variability](#)
- [Miramar to CBD express route comparison](#)
- [Detour routes](#)

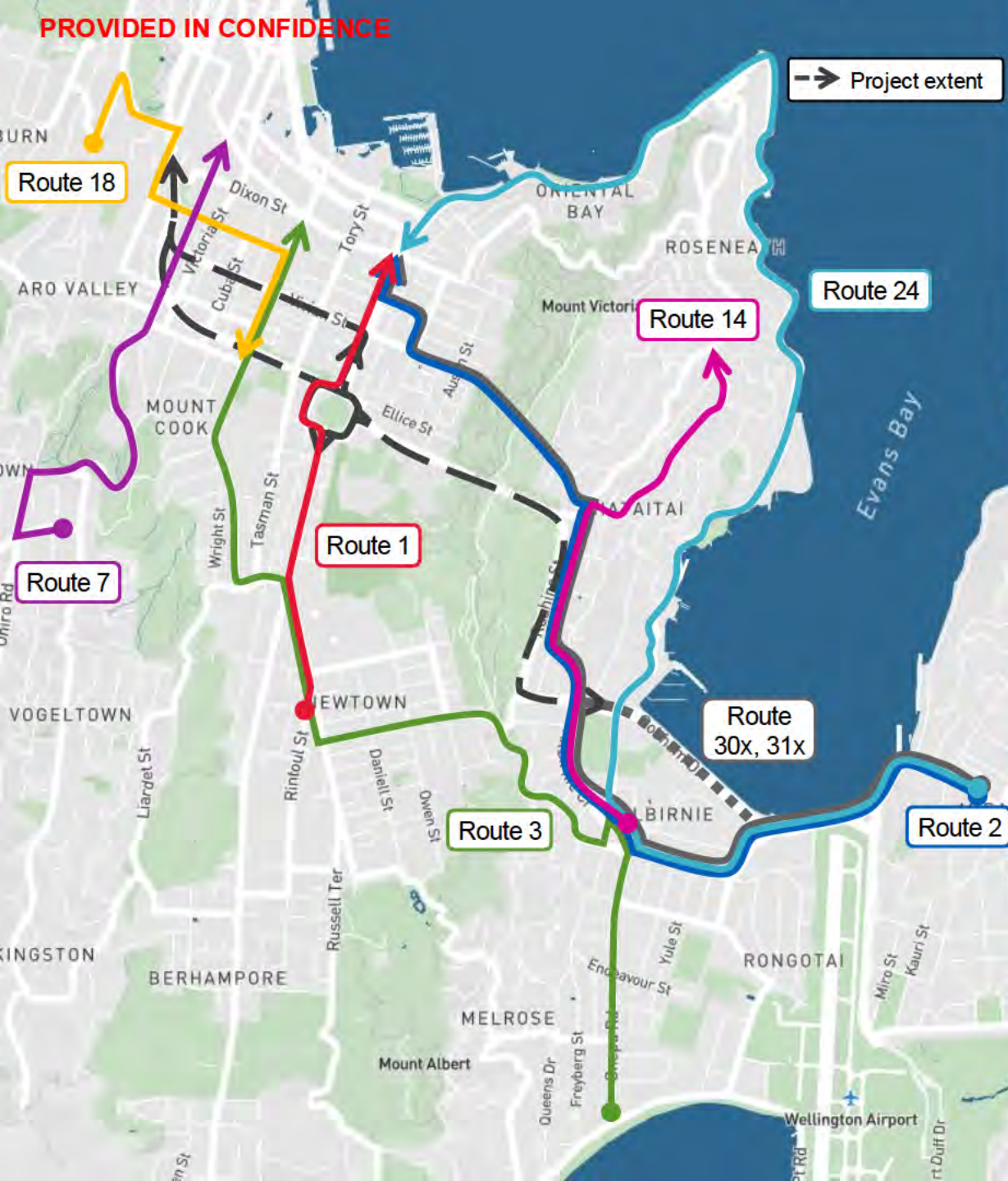
Bus route analysis

Modelling methodology

- Two tools have been used to understand PT performance under the option:
 - WTSM: Regional model focusing on demand (multi modal) and network benefits; these demands are carried through to Aimsun.
 - Nga Uranga to airport (Aimsun): 2033 operational model looking at network performance by focusing on vehicle movements (buses are represented as vehicles on the network).
- This approach is consistent with work undertaken on other WCC projects.
- Aimsun outputs have been used in this slide pack to provide an estimate of bus route travel times.
- This bus route analysis was prepared using the Aimsun results from **21 May 2026**. This model run included the proposed Karo Drive improvements in the Option scenario. Updated model results were output on **4 June 2026** which included the Karo Drive improvements under the Do Min scenario instead. The bus travel times provided here were checked against the new model run, and travel time details were updated for routes where there was a noticeable change from the May results.
- The travel times are plotted along routes to indicate where there may be anomalies or scope for optimisation through detailed design and NPG engagement.
- Note: Models provide a helpful guide as to how the network is operating but should be applied with careful interpretation. Travel times will vary across the various hours during each period depending on the level of congestion experienced.

Bus travel time impacts: Route summary

Segments as requested by GWRC



Route summary: Inbound

Average bus travel time (mins): AM peak hour (8-9am)

Bus route	Section	Do Min (2033)	Option (2033)	Difference
Route 1	Newtown to CBD (at Courtenay Pl)	9.3	8.6	-0.7 (-8%)
Route 2	Miramar to CBD (at Courtenay Pl)	24.1	22.6	-1.5 (-6%)
Route 3	Lyall Bay to CBD (at Manners St)	45.4	32.3	-13.1 (-29%)
Route 7	Brooklyn to CBD (at Manners St)	14.5	16.1	+1.6 (+11%)
Route 14	Kilbirnie to Roseneath	13.3	12.3	-1.0 (-8%)
Route 18	Kelburn to Mount Cook (at Webb St)	16.8	14.6	-2.2 (-13%)
Route 24	Miramar to CBD (at Courtenay Pl)	31.8	27.3	-4.5 (-14%)
Route 30x/31x	Miramar to CBD (at Courtenay Pl)	22.6	22.6	None

Note: Travel times taken from Aimsun model outputs from 21 May 2026 and 4 June 2026.

*The dashed grey line represents the current 30x/31x inbound route along SH1. Under the Option scenario, buses will need to reroute via Kilbirnie as the right turn from SH1 into Hamilton Rd will be removed.



Route summary: Outbound

Average bus travel time (mins): PM peak hour (5-6pm)

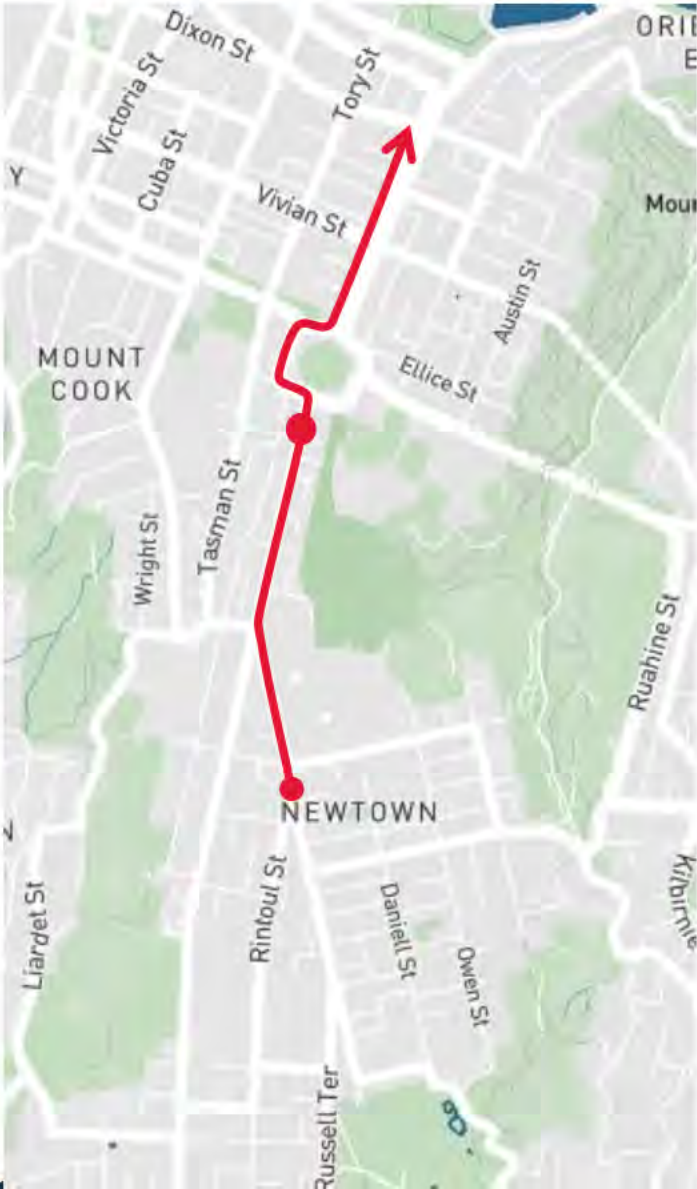
Bus route	Section	Do Min (2033)	Option (2033)	Difference
Route 1	CBD (at Courtenay Pl) to Newtown	7.8	10.1	+2.3 (+29%)
Route 2	CBD (at Courtenay Pl) to Miramar	21.2	20.4	-0.8 (-4%)
Route 3	CBD (at Manners St) to Lyall Bay	32.2	32.0	-0.4 (-1%)
Route 7	CBD (at Manners St) Brooklyn	15.1	12.6	-2.5 (-17%)
Route 14	Roseneath to Kilbirnie	13.0	11.5	-1.5 (-12%)
Route 18	Mount Cook (at Webb St) to Kelburn	12.5	12.7	+0.2 (+2%)
Route 24	CBD (at Courtenay Pl) to Miramar	26.8	27.7	+0.9 (+3%)
Route 30x/31x	CBD (at Courtenay Pl) to Miramar	18.8	17.3	-1.5 (-8%)

Note: Travel times taken from Aimsun model outputs from 21 May 2026 and 4 June 2026.

Bus travel time impacts: Route breakdowns

Segments as requested by GWRC

Route 1: Inbound (Newtown to Courtenay PI)



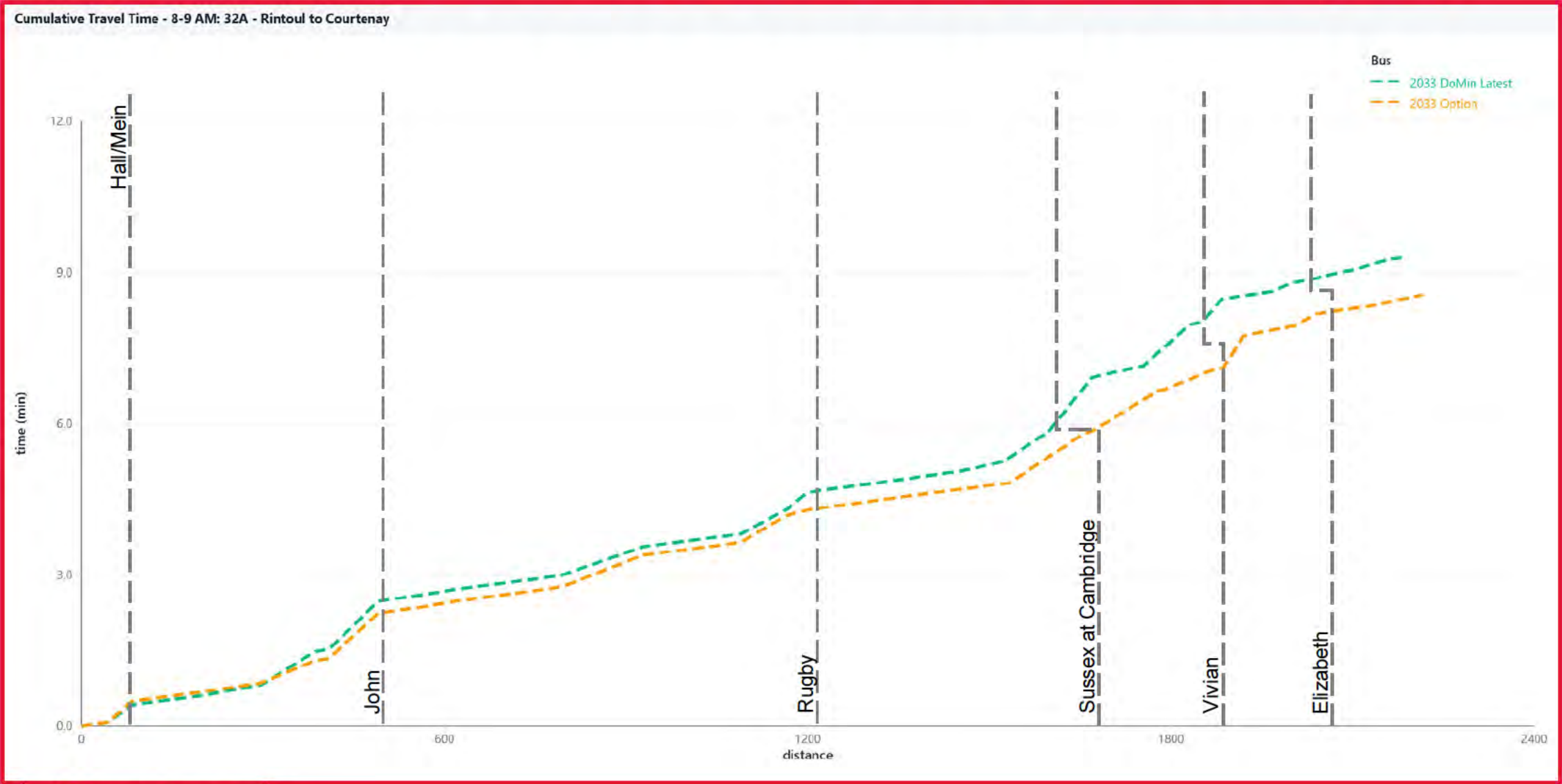
Average bus travel time (mins): AM peak hour (8-9am)

Route section	Do Min (2033)	Option (2033)	Difference
Rintoul St (at Riddiford St) to south of Basin (at Alfred St)	4.3	4.2	-0.1 (-2%)
South of Basin (at Alfred St) to CBD (Courtenay PI)	5.0	4.4	-0.6 (-12%)
Total	9.3	8.6	-0.7 (-8%)

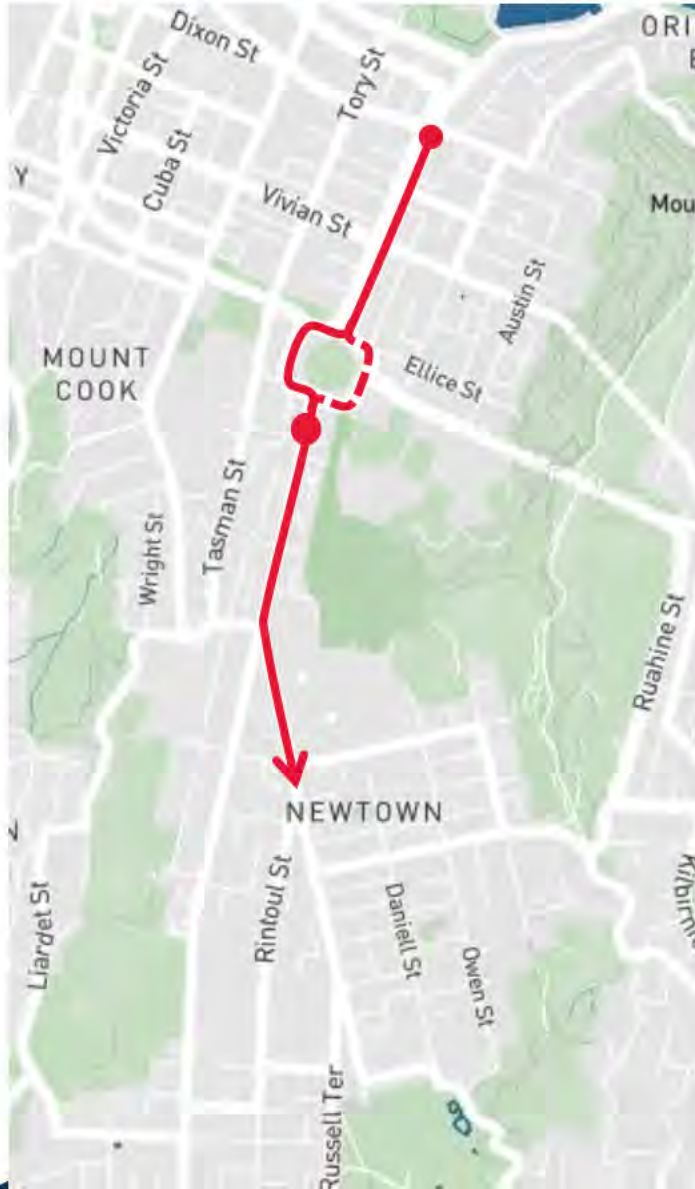
Note: Travel times taken from Aimsun model output from 4 June 2026.

- Decrease in travel time between the Do Min and Option scenarios
- The travel time savings are incremental along the route, with more substantial savings along Cambridge Tce

Route 1: Inbound (Newtown to Courtenay PI)



Route 1: Outbound (Courtenay PI to Newtown)

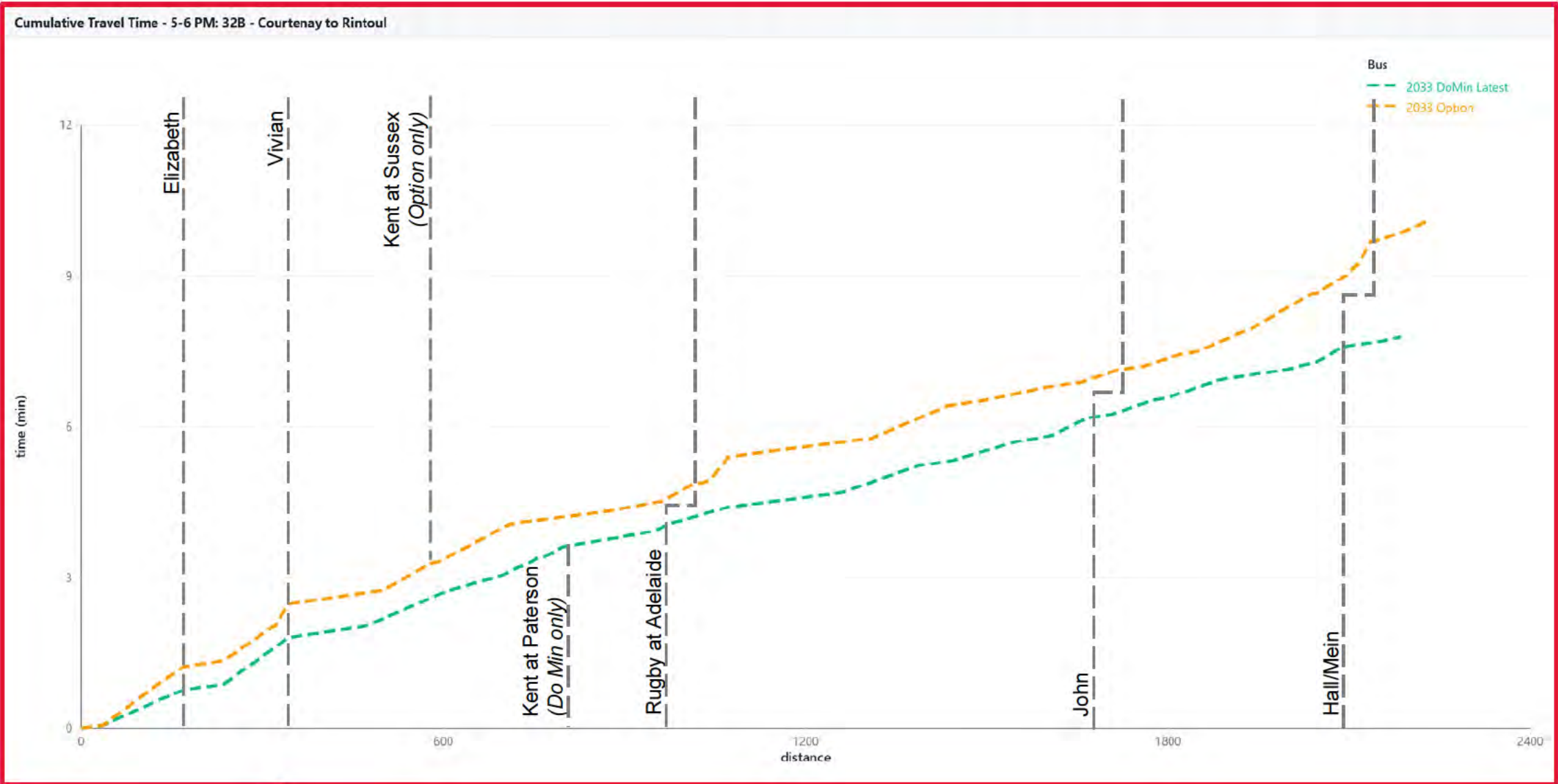


Average bus travel time (mins): PM peak hour (5-6pm)

Route section	Do Min (2033)	Option (2033)	Difference
<i>CBD (Courtenay PI) to south of Basin (at Alfred St)</i>	4.4	5.4	+1.0 (+23%)
<i>South of Basin (at Alfred St) to Wellington Hospital</i>	3.4	4.7	+1.3 (+38%)
Total	7.8	10.1	+2.3 (+29%)
Note: Travel times taken from Aimsun model output from 4 June 2026.			

- Increase in travel time from Do Min to the Option scenario
- The delay increases predominantly occur:
 - Along Kent Tce through the Elizabeth St and Vivian St intersections; traffic volumes here are projected to increase under the Option. It is anticipated that bus priority here may mitigate this (not fully represented in the model)
 - After the Rugby St/Adelaide Rd intersection, ahead of the inline bus stop on Adelaide Rd and where the southbound bus lane begins and the two general traffic lanes merge into one. Bus stop coding in the model means that buses in the stop delay subsequent services. This is likely to be a modelling quirk but further investigation will be warranted at the next stage.
 - On Riddiford St, on approach to the Hall St/Mein St intersection. Further interrogation of the modelling suggests that this is a result of one model replication with higher levels of queuing at this intersection. It is anticipated that this can be resolved through further corridor optimisation

Route 1: Outbound (Courtenay PI to Newtown)



Route 2: Inbound (Miramar to Courtenay PI)



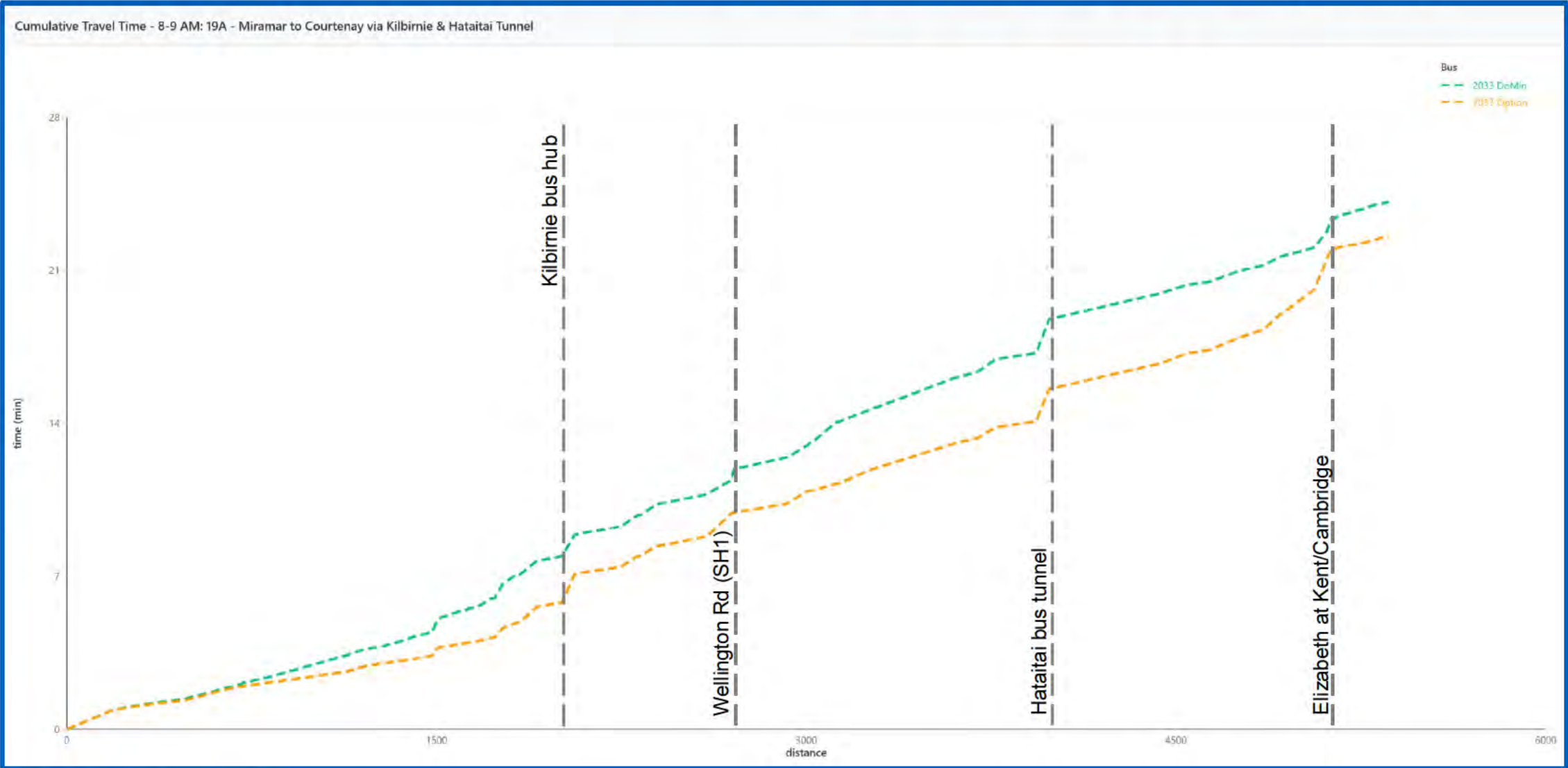
Average bus travel time (mins): AM peak hour (8-9am)

Route section	Do Min (2033)	Option (2033)	Difference
Miramar town centre to Troy St (at Kemp St)	3.9	3.1	-0.8 (-21%)
Troy St (at Kemp St) to Kilbirnie bus hub	4.0	2.7	-1.3 (-33%)
Kilbirnie bus hub to Wellington Rd (SH1)	4.1	4.2	+0.1 (+2%)
Wellington Rd (SH1) to Hataitai town centre	4.4	3.4	-1.0 (-23%)
Hataitai town centre to Pirie St (at Brougham St)	4.6	4.5	-0.1 (-2%)
Pirie St (at Brougham St) to CBD (Courtenay PI)	3.1	4.7	+1.6 (+52%)
Total	24.1	22.6	-1.5 (-6%)

Note: Travel times taken from Aimsun model output from 21 May 2026.

- Overall decrease in travel time from Do Min to the Option scenario
- Travel time savings occur:
 - Through the Cobham Dr roundabouts
 - On approach to the Kilbirnie bus hub
 - On Moxham Ave through Hataitai
- Increase in travel time through Mount Victoria on Elizabeth St at the Kent/Cambridge intersection; this will need to be a key intersection of focus as the design is progressed

Route 2: Inbound (Miramar to Courtenay PI)



Route 2: Outbound (Courtenay PI to Miramar)



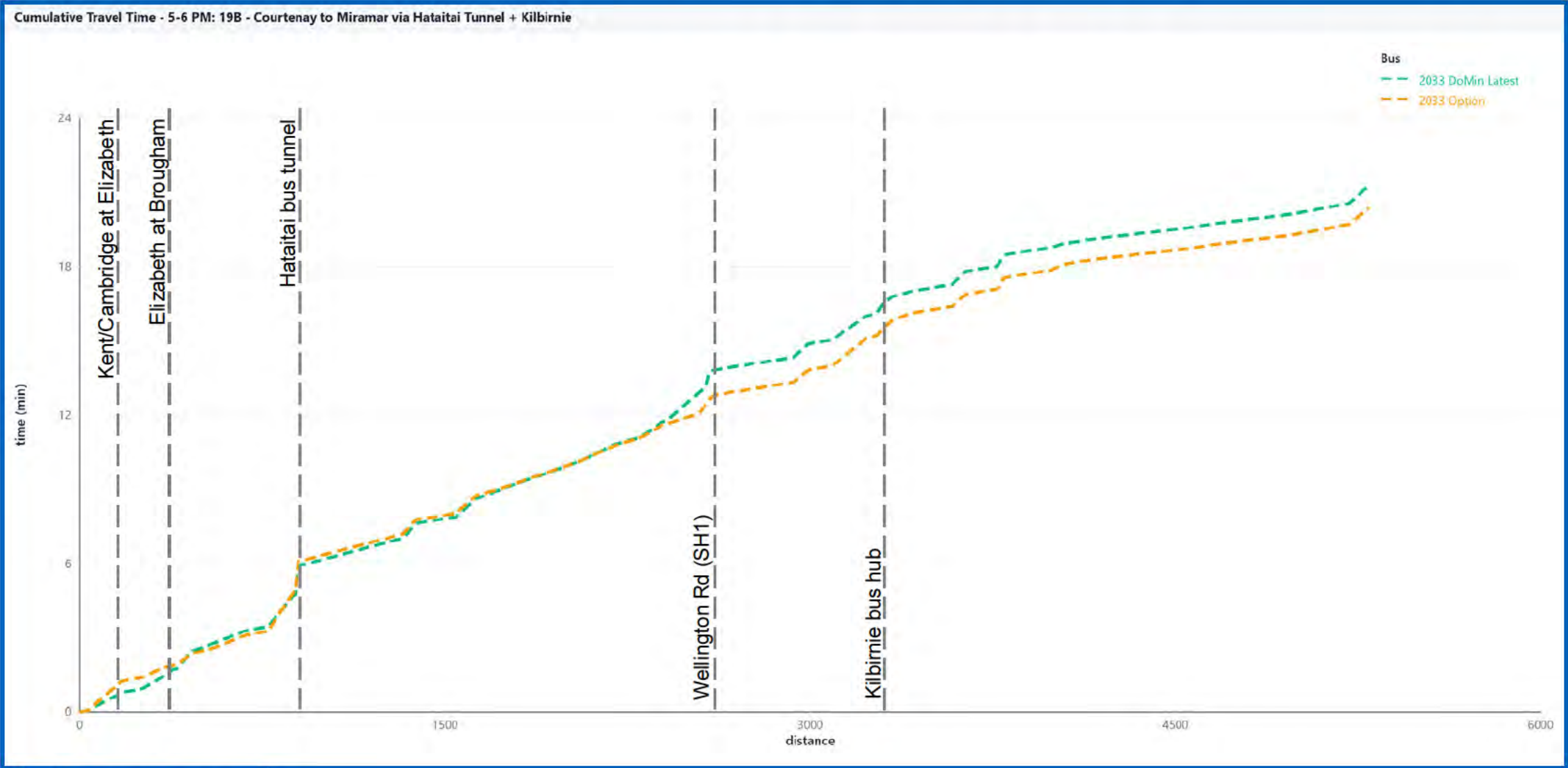
Average bus travel time (mins): PM peak hour (5-6pm)

Route section	Do Min (2033)	Option (2033)	Difference
CBD (Courtenay PI) to Brougham St (at Pirie St)	2.8	2.6	-0.2 (-7%)
Brougham St (at Pirie St) to Hataitai town centre	5.7	6.0	+0.3 (+5%)
Hataitai town centre to Wellington Rd (SH1)	5.3	4.2	-1.1 (-21%)
Wellington Rd (SH1) to Kilbirnie bus hub	2.8	2.8	None
Kilbirnie bus hub to Troy St (at Kemp St)	2.1	2.1	None
Troy St (at Kemp St) to Miramar town centre	2.5	2.7	+0.2 (+8%)
Total	21.2	20.4	-0.8 (-4%)

Note: Travel times taken from Aimsun model output from 4 June 2026.

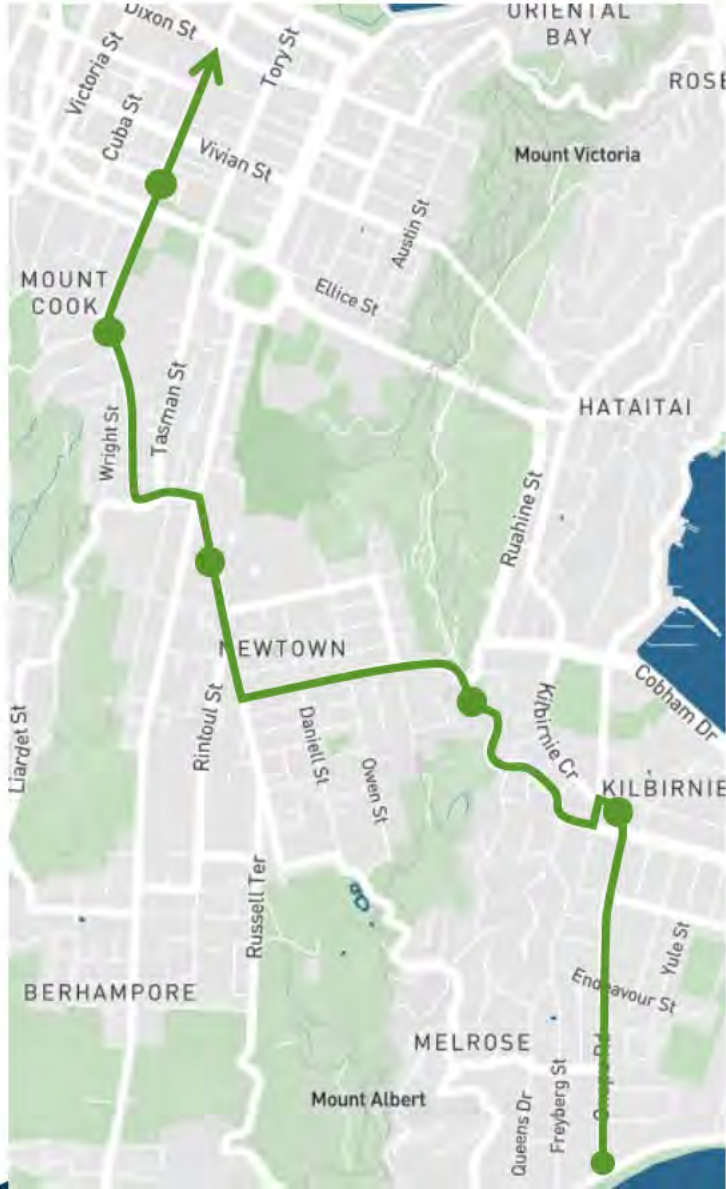
- Overall decrease in travel time from Do Min to the Option scenario
- Majority of travel time savings occur through Hataitai

Route 2: Outbound (Courtenay PI to Miramar)



Route 3: Inbound (Lyal Bay to Manners St)

Average bus travel time (mins): AM peak hour (8-9am)

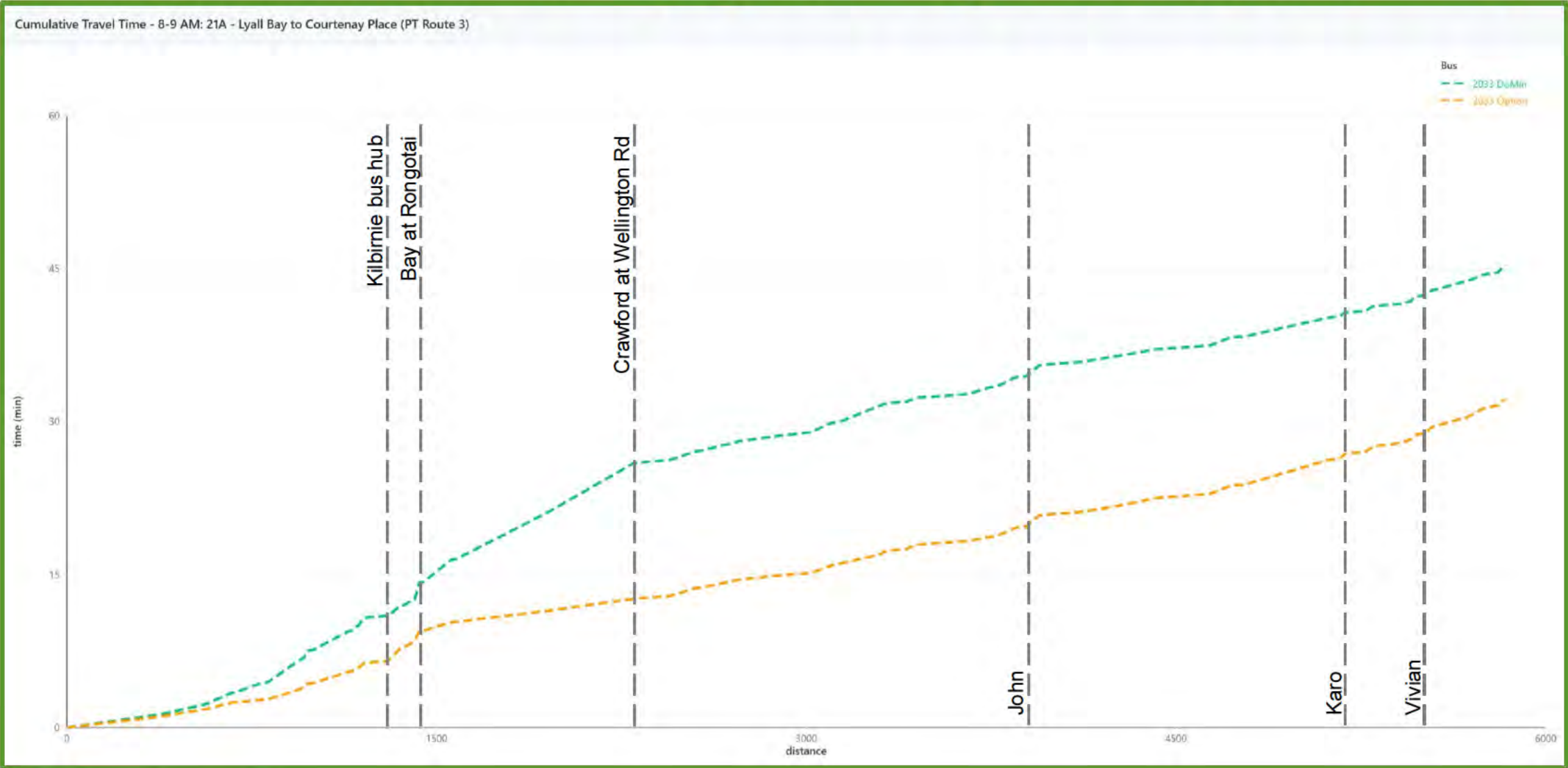


Route section	Do Min (2033)	Option (2033)	Difference
<i>Lyall Bay (at Lyall Pde) to Kilbirnie bus hub</i>	11.0	6.5	-4.5 (-41%)
<i>Kilbirnie bus hub to Crawford Rd (at Wellington Rd)</i>	14.9	6.1	-8.8 (-59%)
<i>Crawford Rd (at Wellington Rd) to Wellington Hospital</i>	6.8	5.7	-1.1 (-16%)
<i>Wellington Hospital to Wallace St (at Bidwill St)</i>	5.6	5.4	-0.2 (-4%)
<i>Wallace St (at Bidwill St) to Taranaki St (at Abel Smith)</i>	3.0	3.9	+0.9 (+30%)
<i>Taranaki St (at Abel Smith) to CBD (Manners St)</i>	4.1	4.7	+0.6 (+15%)
Total	45.4	32.3	-13.1 (-29%)

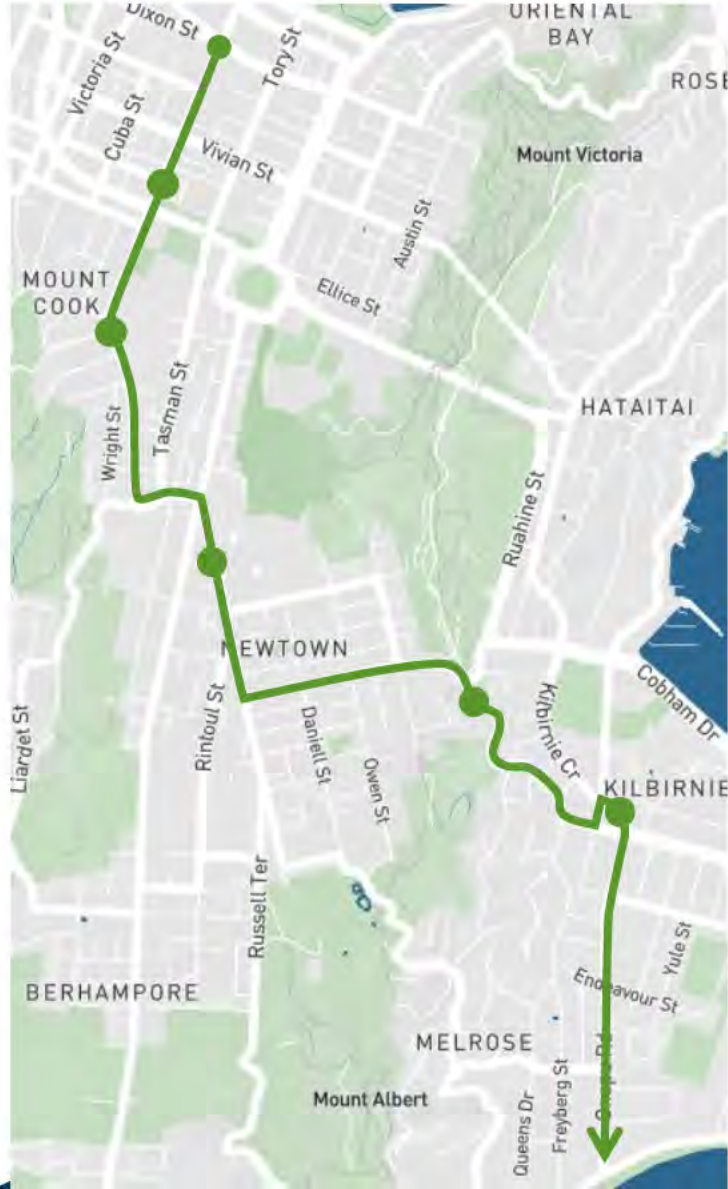
Note: Travel times taken from Aimsun model output from 21 May 2026.

- Decrease in travel time from Do Min to the Option scenario
- Travel time savings occur:
 - On approach to the Kilbirnie bus hub
 - On Crawford Rd, through the Wellington Rd roundabout
 - Through Newtown

Route 3: Inbound (Lyall Bay to Manners St)



Route 3: Outbound (Manners St to Lyall Bay)



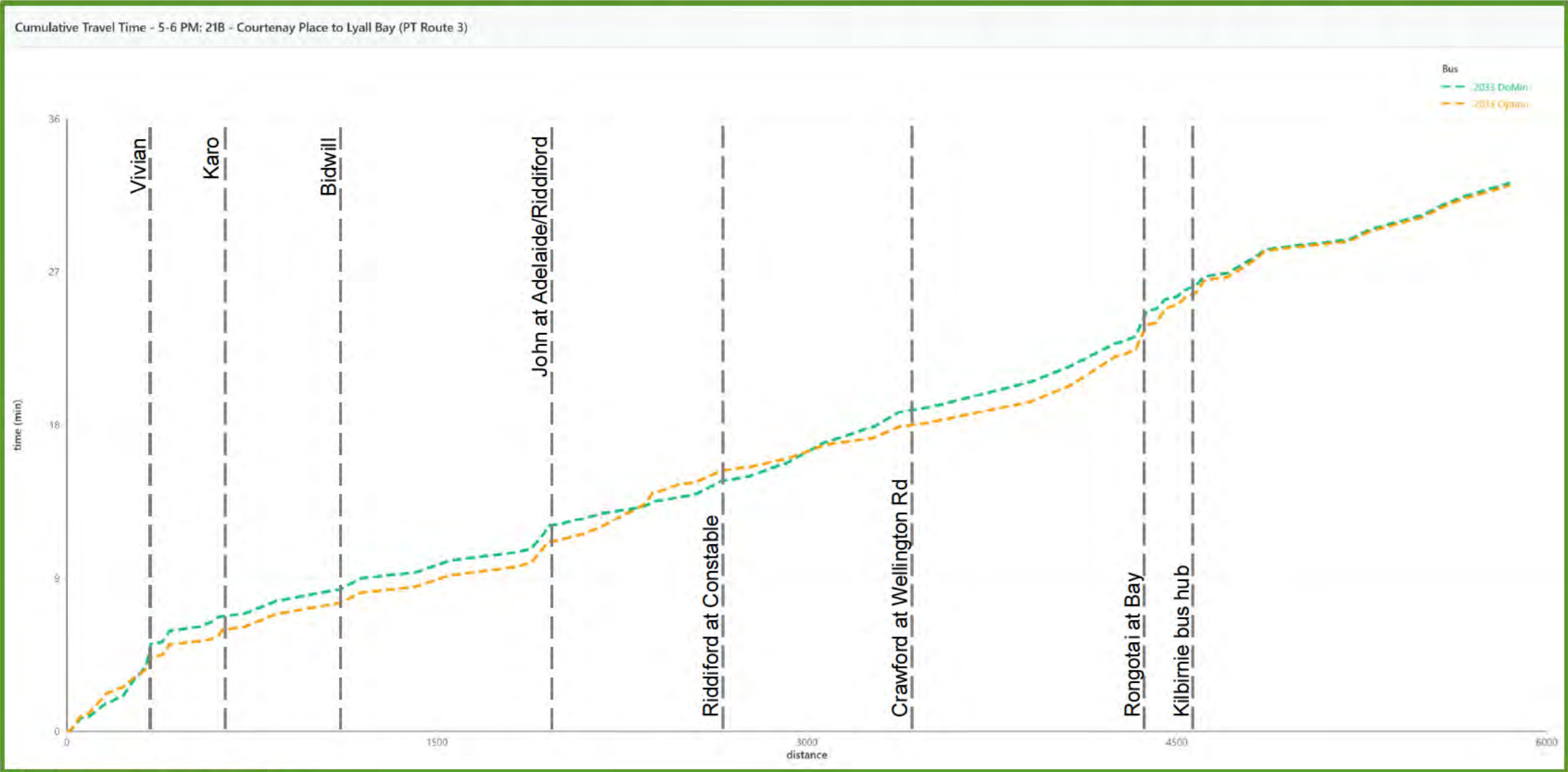
Average bus travel time (mins): PM peak hour (5-6pm)

Route section	Do Min (2033)	Option (2033)	Difference
<i>CBD (Manners St) to Taranaki St (at Abel Smith)</i>	6.1	5.3	-0.8 (-13%)
<i>Taranaki St (at Abel Smith) to Wallace St (at Bidwill St)</i>	2.2	2.2	None
<i>Wallace St (at Bidwill St) to Wellington Hospital</i>	4.5	4.6	+0.1 (+2%)
<i>Wellington Hospital to Crawford Rd (at Wellington Rd)</i>	6.3	6.1	-0.2 (-1%)
<i>Crawford Rd (at Wellington Rd) to Kilbirnie bus hub</i>	6.8	7.3	+0.5 (+7%)
<i>Kilbirnie bus hub to Lyall Bay (at Lyall Pde)</i>	6.3	6.5	+0.2 (+3%)
Total	32.2	32.0	-0.2 (-1%)

Note: Travel times taken from Aimsun model output from 21 May 2026.

- Negligible overall change in travel time between the Do Min and Option scenarios

Route 3: Outbound (Manners St to Lyall Bay)



Route 7: Inbound (Brooklyn to Manners St)

Average bus travel time (mins): AM peak hour (8-9am)

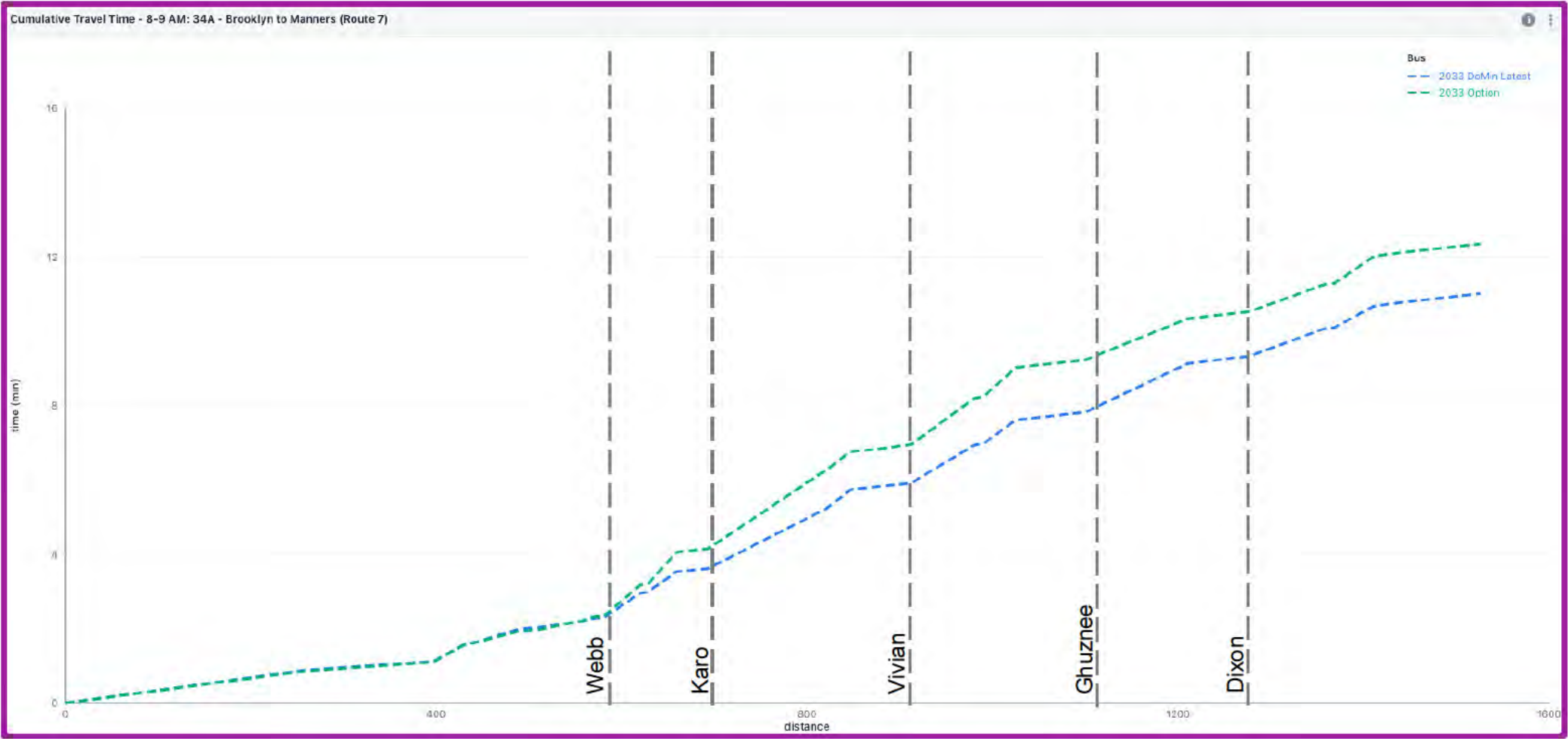


Route section	Do Min (2033)	Option (2033)	Difference
Brooklyn (Cleveland St) to Brooklyn Rd (at Nairn St)	5.3	5.3	None
Brooklyn Rd (at Nairn St) to Willis St (at Ghuznee St)	7.6	9.0	+1.4 (+18%)
Willis St (at Ghuznee St) to CBD (Manners St)	3.4	3.3	-0.1 (-3%)
Total	16.3	17.6	+1.3 (+11%)

Note: Travel times taken from Aimsun model output from 4 June 2026.

- Increase in travel time from Do Min to the Option scenario
- Majority of increased delay occurs on Willis Street travelling across Karo Dr (SH1), Vivian St (SH1), and Ghuznee St

Route 7: Inbound (Brooklyn to Manners St)



Route 7: Outbound (Manners St to Brooklyn)

Average bus travel time (mins): PM peak hour (5-6pm)

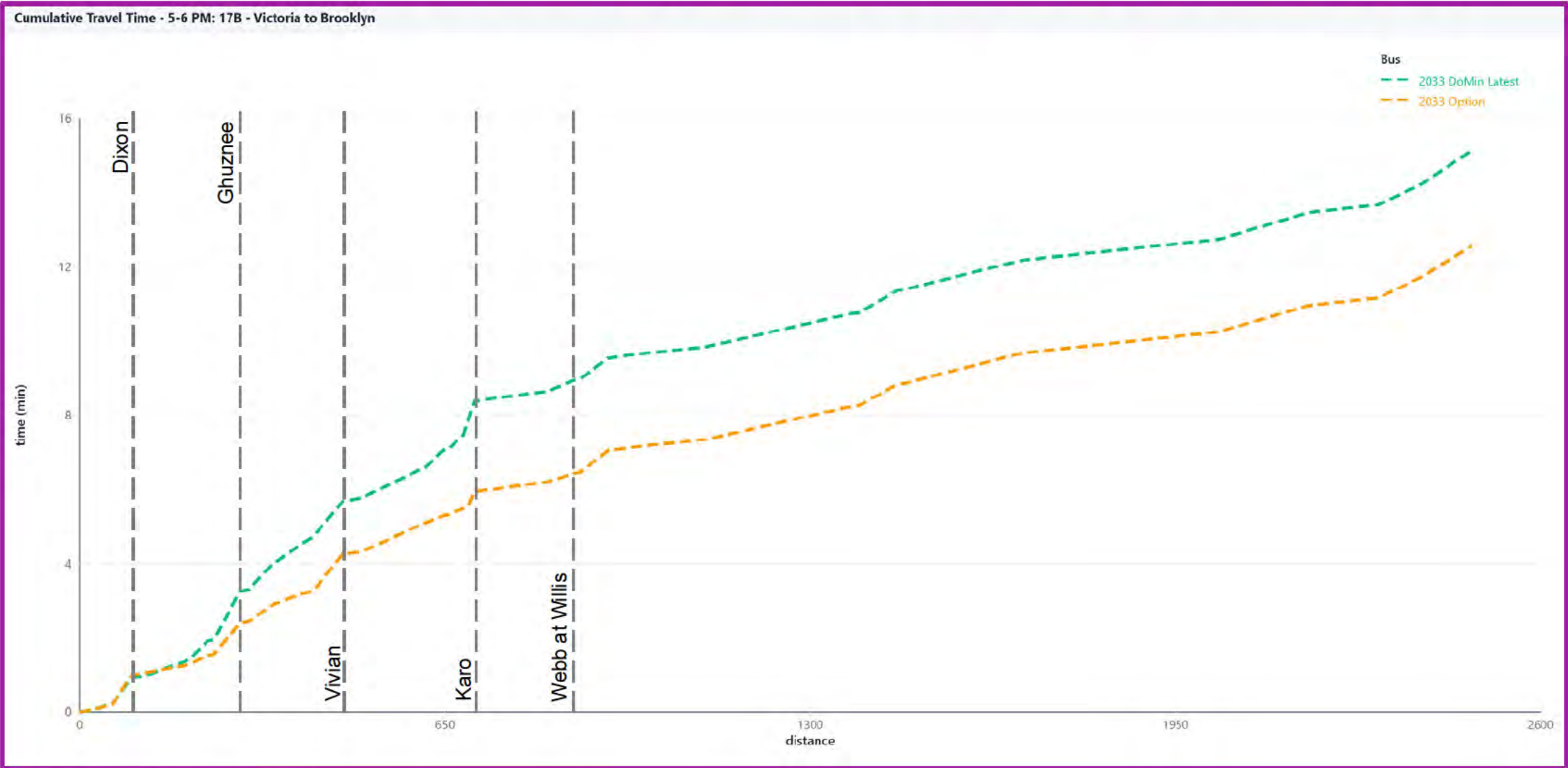


Route section	Do Min (2033)	Option (2033)	Difference
CBD (Manners St) to Victoria St (at Ghuznee St)	3.3	2.4	-0.9 (-27%)
Victoria St (at Ghuznee St) to Brooklyn Rd (at Nairn St)	5.6	4.0	-1.6 (-29%)
Brooklyn Rd (at Nairn St) to Brooklyn (Cleveland St)	6.2	6.2	None
Total	15.1	12.6	-2.5 (-17%)

Note: Travel times taken from Aimsun model output from 4 June 2026.

- Decrease in travel time from Do Min to the Option scenario
- Majority of travel time savings occurs on Victoria St travelling across Karo Dr (SH1)

Route 7: Outbound (Manners St to Brooklyn)



Route 14: Inbound (Kilbirnie to Roseneath)

Average bus travel time (mins): AM peak hour (8-9am)

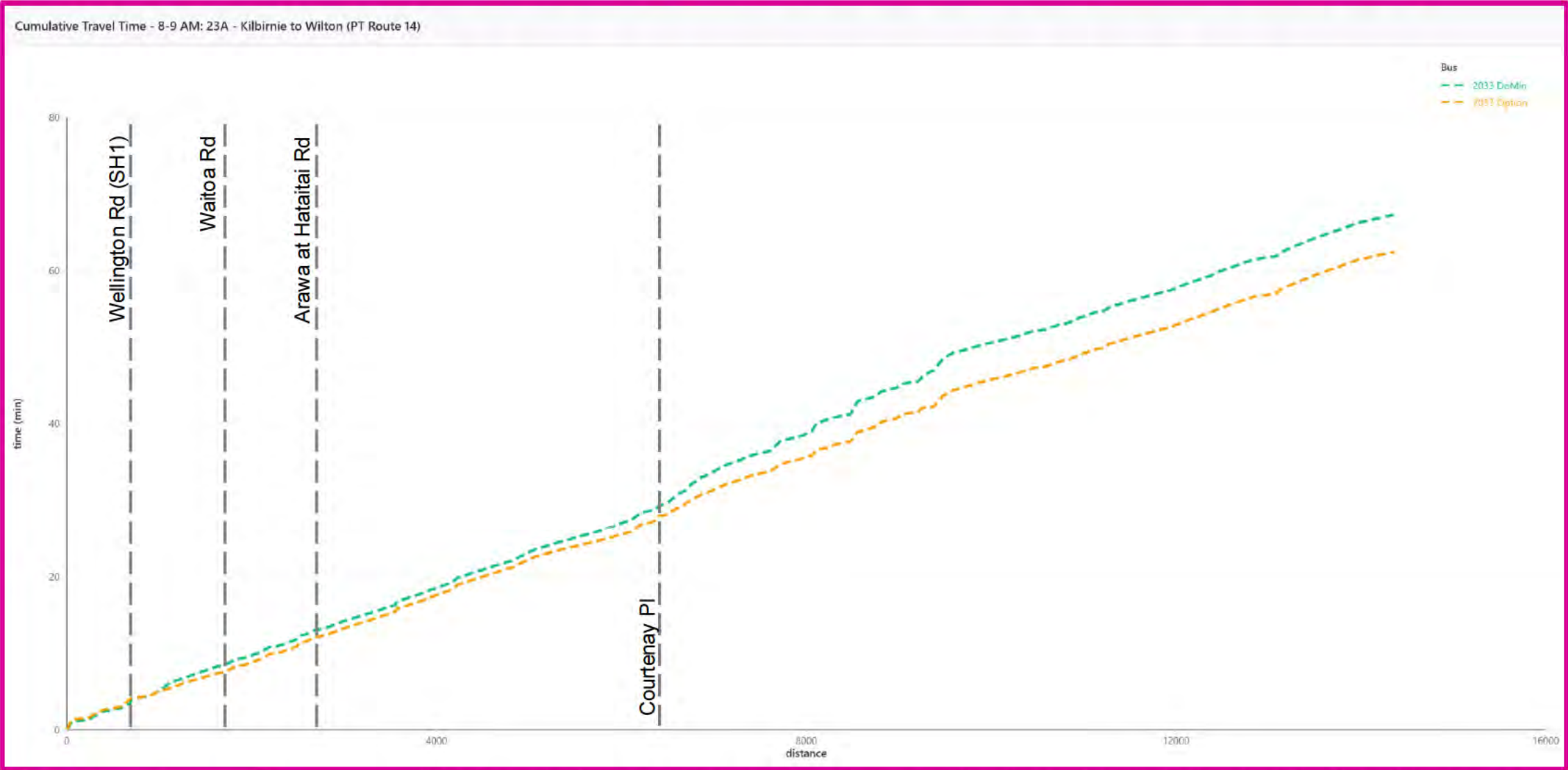


Route section	Do Min (2033)	Option (2033)	Difference
Kilbirnie bus hub to Wellington Rd (SH1)	4.0	4.1	+0.1 (+2%)
Wellington Rd (SH1) to Hataitai town centre	4.5	3.4	-1.1 (-24%)
Hataitai town centre to Roseneath (Arawa Rd at Hataitai Rd)	4.8	4.8	None
Total	13.3	12.3	-1.0 (-8%)

Note: Travel times taken from Aimsun model output from 21 May 2026.

- Decrease in travel time from Do Min to the Option scenario
- Travel time savings occur on Moxham Ave through Hataitai

Route 14: Inbound (Kilbirnie to Roseneath*)



*Note: Due to model coding, the chart extends past Roseneath and includes data for Route 14 along the Golden Mile and through to Wilton.

Route 14: Outbound (Roseneath to Kilbirnie)



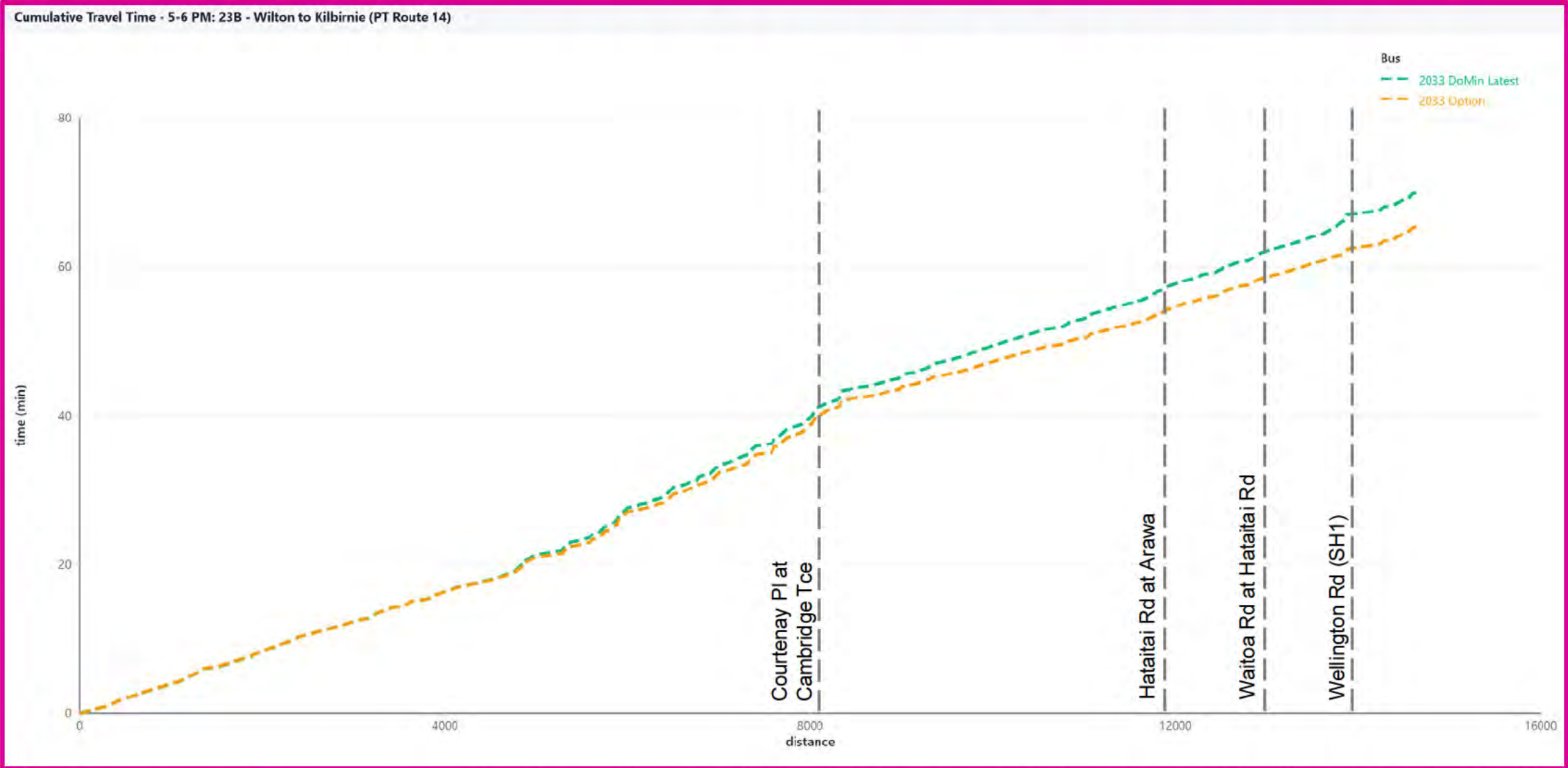
Average bus travel time (mins): PM peak hour (5-6pm)

Route section	Do Min (2033)	Option (2033)	Difference
Roseneath (Arawa Rd at Hataitai Rd) to Hataitai town centre	5.0	4.6	-0.4 (-8%)
Hataitai town centre to Wellington Rd (SH1)	5.2	3.9	-1.3 (-25%)
Wellington Rd (SH1) to Kilbirnie bus hub	2.8	3.0	+0.2 (+7%)
Total	13.0	11.5	-1.5 (-12%)

Note: Travel times taken from Aimsun model output from 4 June 2026.

- Decrease in travel time from Do Min to the Option scenario
- Travel time savings occur on Moxham Ave through Hataitai

Route 14: Outbound (Roseneath to Kilbirnie)



*Note: Due to model coding, the chart starts before Roseneath and includes data for Route 14 from Wilton and along the Golden Mile.

Route 18: Inbound (Kelburn to Mount Cook)



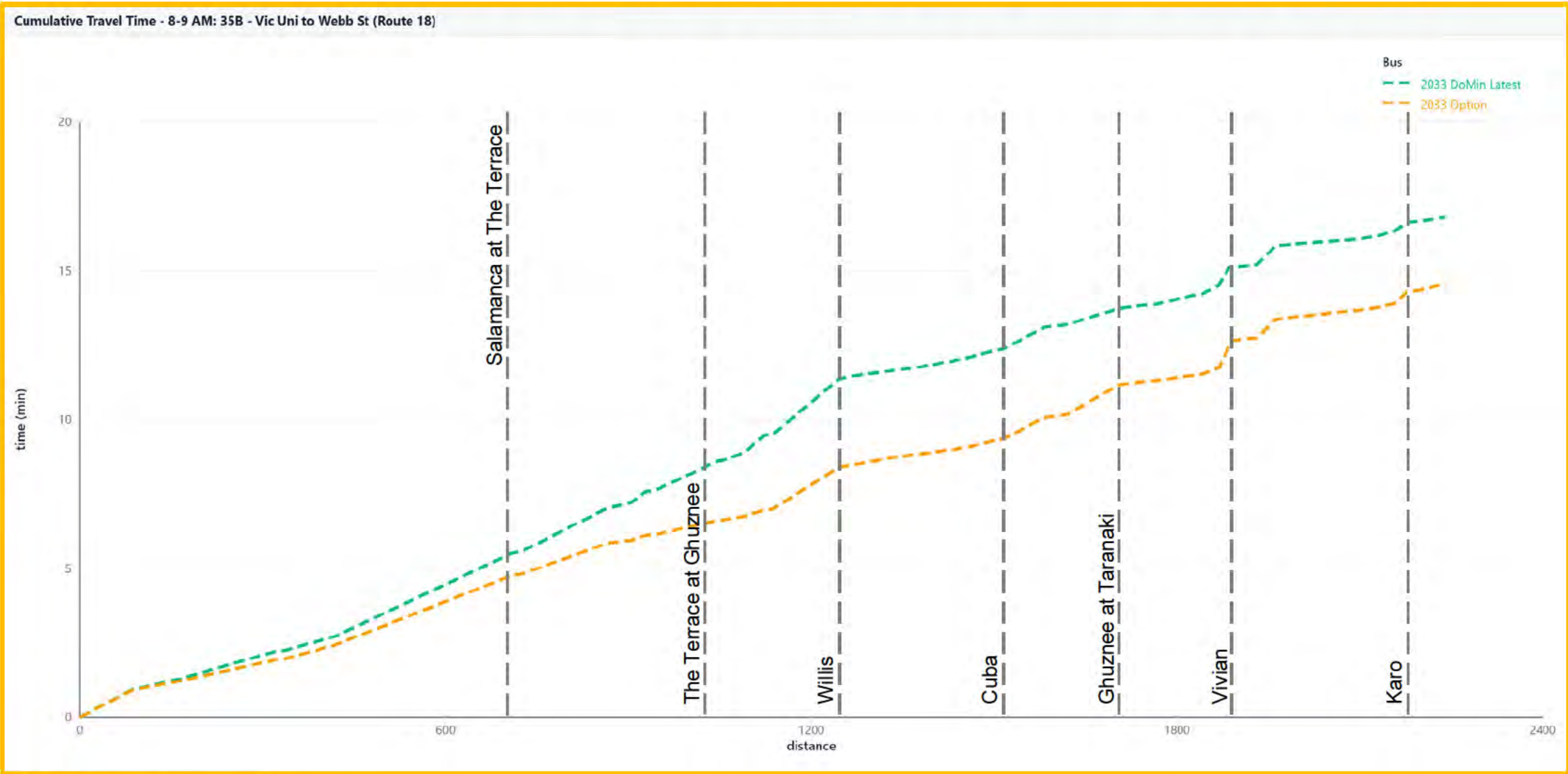
Average bus travel time (mins): AM peak hour (8-9am)

Route section	Do Min (2033)	Option (2033)	Difference
Kelburn (Kelburn Pde) to The Terrace (at Ghuznee St)	8.6	6.6	-2.0 (-23%)
The Terrace (at Ghuznee St) to Ghuznee St (at Cuba St)	3.7	2.7	-1.0 (-27%)
Ghuznee St (at Cuba St) to Taranaki St (at Webb St)	4.5	5.3	+0.8 (+18%)
Total	16.8	14.6	-2.2 (-13%)

Note: Travel times taken from Aimsun model output from 4 June 2026.

- Decrease in travel time between the Do Min and Option scenarios
- Travel time savings occur between Salamanca Rd and Cuba St
- However, there is a loss of travel time savings on approach to and along Taranaki St

Route 18: Inbound (Kelburn to Mount Cook)



Route 18: Outbound (Mount Cook to Kelburn)



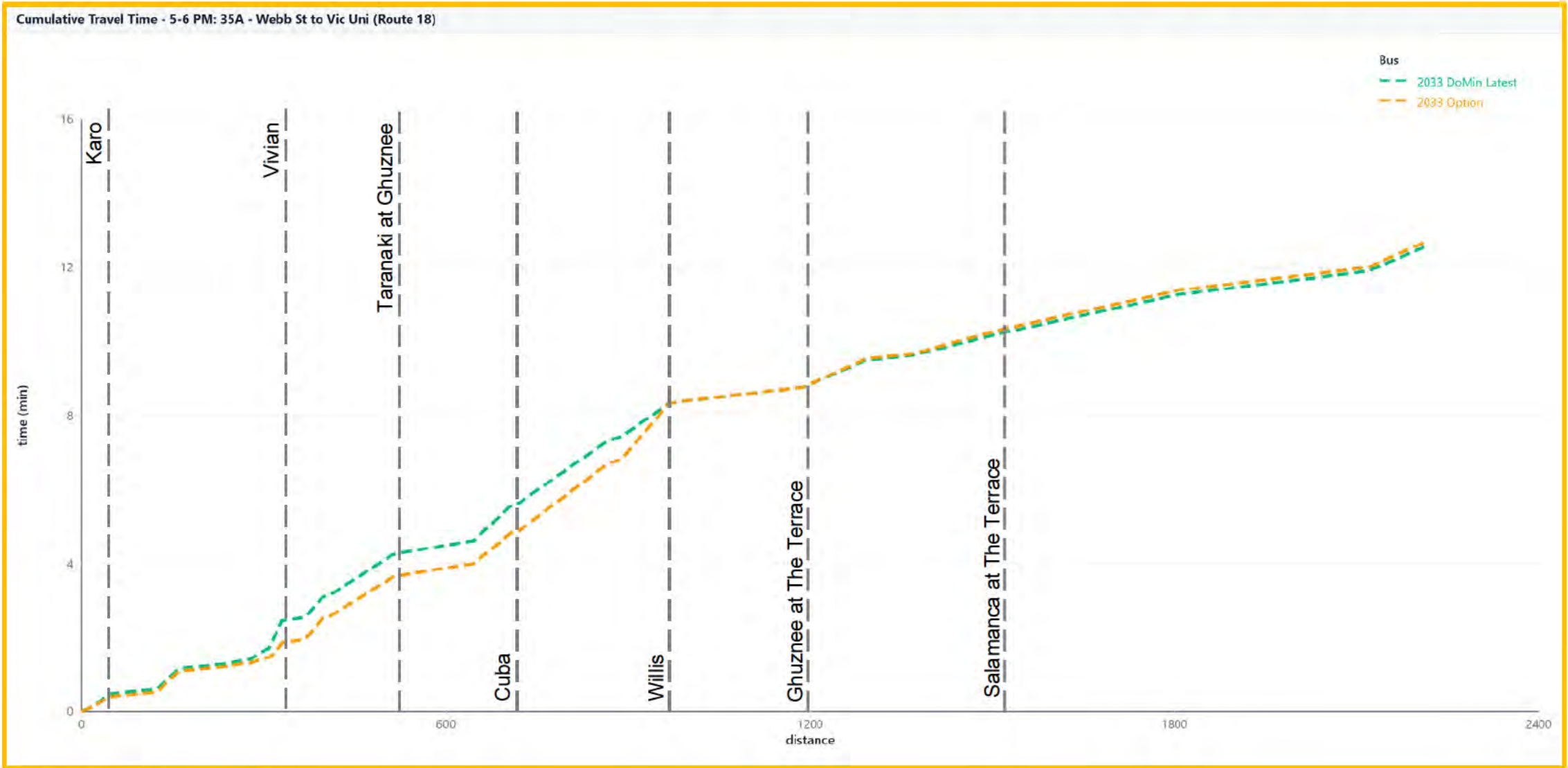
Average bus travel time (mins): PM peak hour (5-6pm)

Route section	Do Min (2033)	Option (2033)	Difference
Taranaki St (at Webb St) to Ghuznee St (at Cuba St)	5.6	4.9	-0.7 (-13%)
Ghuznee St (at Cuba St) to Ghuznee St (at The Terrace)	3.2	3.9	+0.7 (+22%)
Ghuznee St (at The Terrace) to Kelburn (Kelburn Pde)	3.7	3.9	+0.2 (+5%)
Total	12.5	12.7	+0.2 (+2%)

Note: Travel times taken from Aimsun model output from 4 June 2026.

- Decrease in travel time from Do Min to the Option scenario
- Travel time savings along Taranaki St on approach to Vivian St
- However, loss of travel time savings along Ghuznee St on approach to Willis St

Route 18: Outbound (Mount Cook to Kelburn)



Route 24: Inbound (Kilbirnie to Courtenay PI)

Average bus travel time (mins): AM peak hour (8-9am)

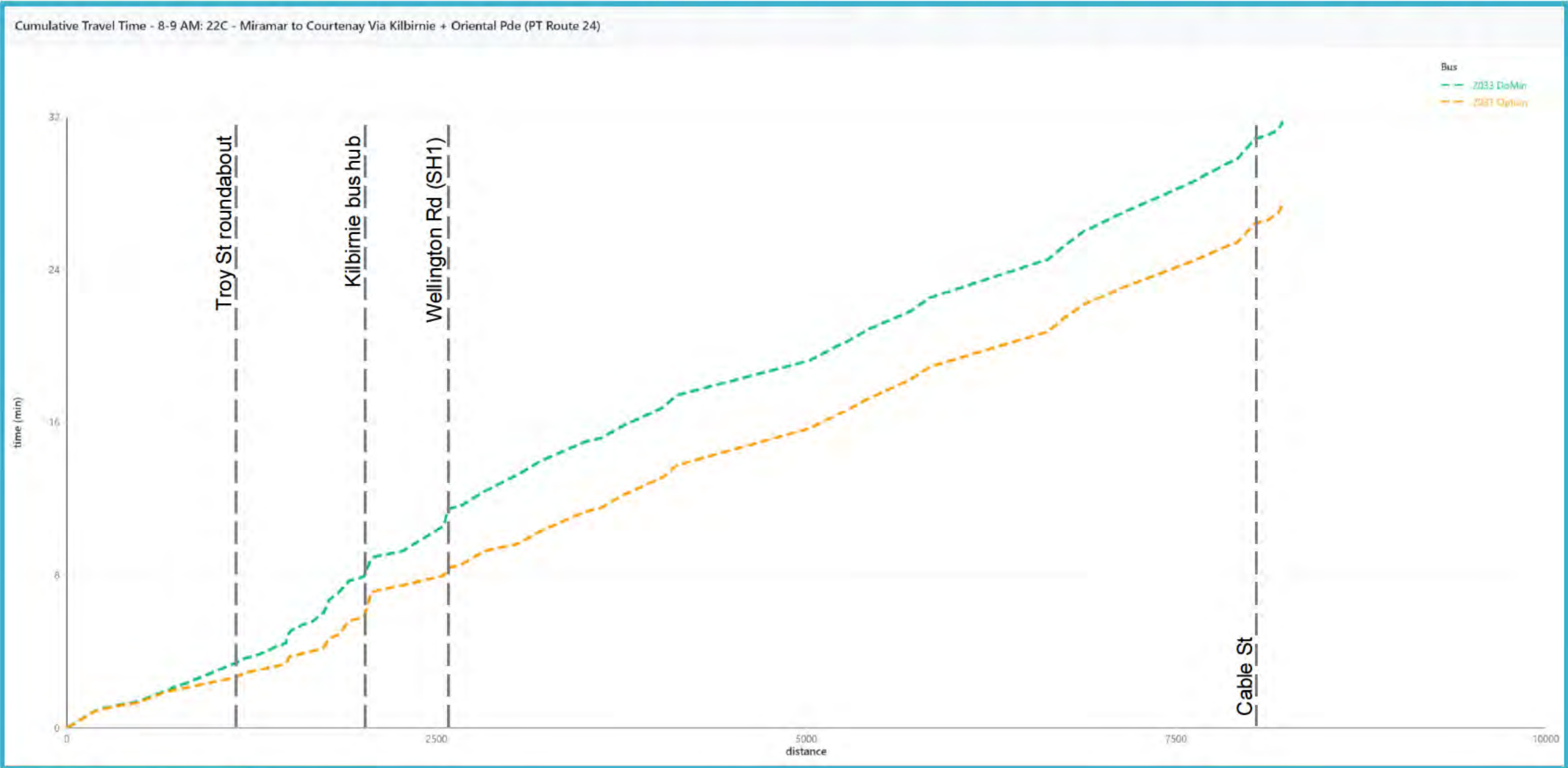


Route section	Do Min (2033)	Option (2033)	Difference
Miramar town centre to Kilbirnie bus hub	7.9	5.8	-2.1 (-27%)
Kilbirnie bus hub to Evans Bay Pde (north of SH1)	3.6	2.6	-1.0 (-28%)
Evans Bay Pde (north of SH1) to CBD (Courtenay PI)	20.3	18.9	-1.4 (-7%)
Total	31.8	27.3	-4.5 (-14%)

Note: Travel times taken from Aimsun model output from 21 May 2026.

- Decrease in travel time from Do Min to the Option scenario
- Travel time savings occur consistently along the route

Route 24: Inbound (Kilbirnie to Courtenay PI)



Route 24: Outbound (Courtenay PI to Kilbirnie)

Average bus travel time (mins): PM peak hour (5-6pm)

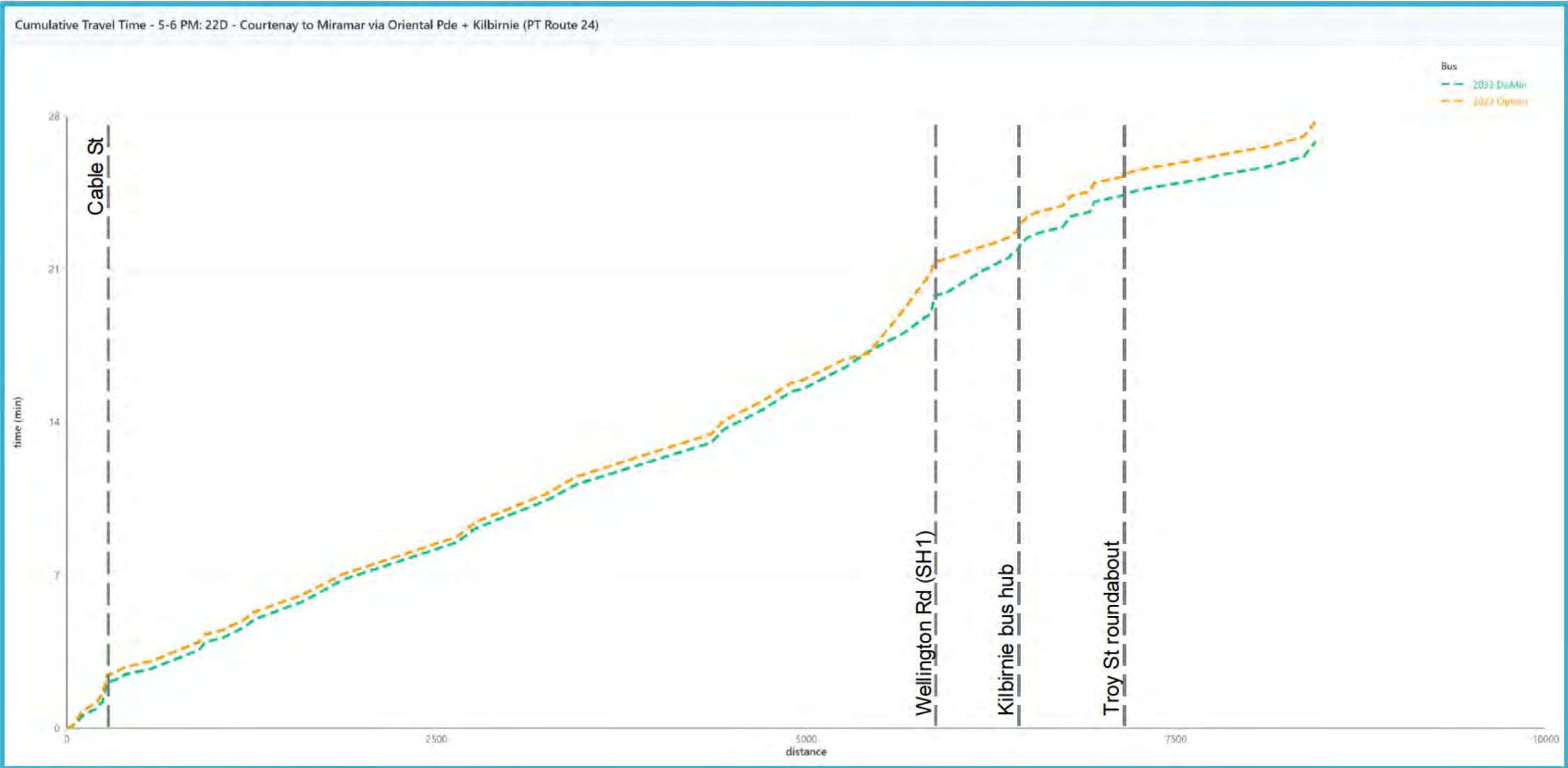


Route section	Do Min (2033)	Option (2033)	Difference
CBD (Courtenay PI) to Evans Bay Pde (north of SH1)	19.9	21.4	+1.5 (+8%)
Evans Bay Pde (north of SH1) to Kilbirnie bus hub	2.4	1.8	-0.6 (-25%)
Kilbirnie bus hub to Miramar town centre	4.5	4.5	None
Total	26.8	27.7	+0.9 (+3%)

Note: Travel times taken from Aimsun model output from 21 May 2026.

- Increase in travel time from Do Min to the Option scenario
- The increase in travel time occurs on the section between Courtenay PI and Wellington Rd (SH1):
 - Travel time around the bays remains similar between the Do Min and Option scenarios
 - The majority of the increase in travel time occurs on the end of this segment, on the approach to Wellington Rd (SH1)

Route 24: Outbound (Courtenay Pl to Kilbirnie)



Route 30x/31x: Inbound (Miramar to Courtenay PI)



*The dashed line represents the current 30x/31x inbound route along SH1. Under the DF2 scenario, buses will need to reroute via Kilbirnie as the right turn from SH1 into Hamilton Rd will be removed.

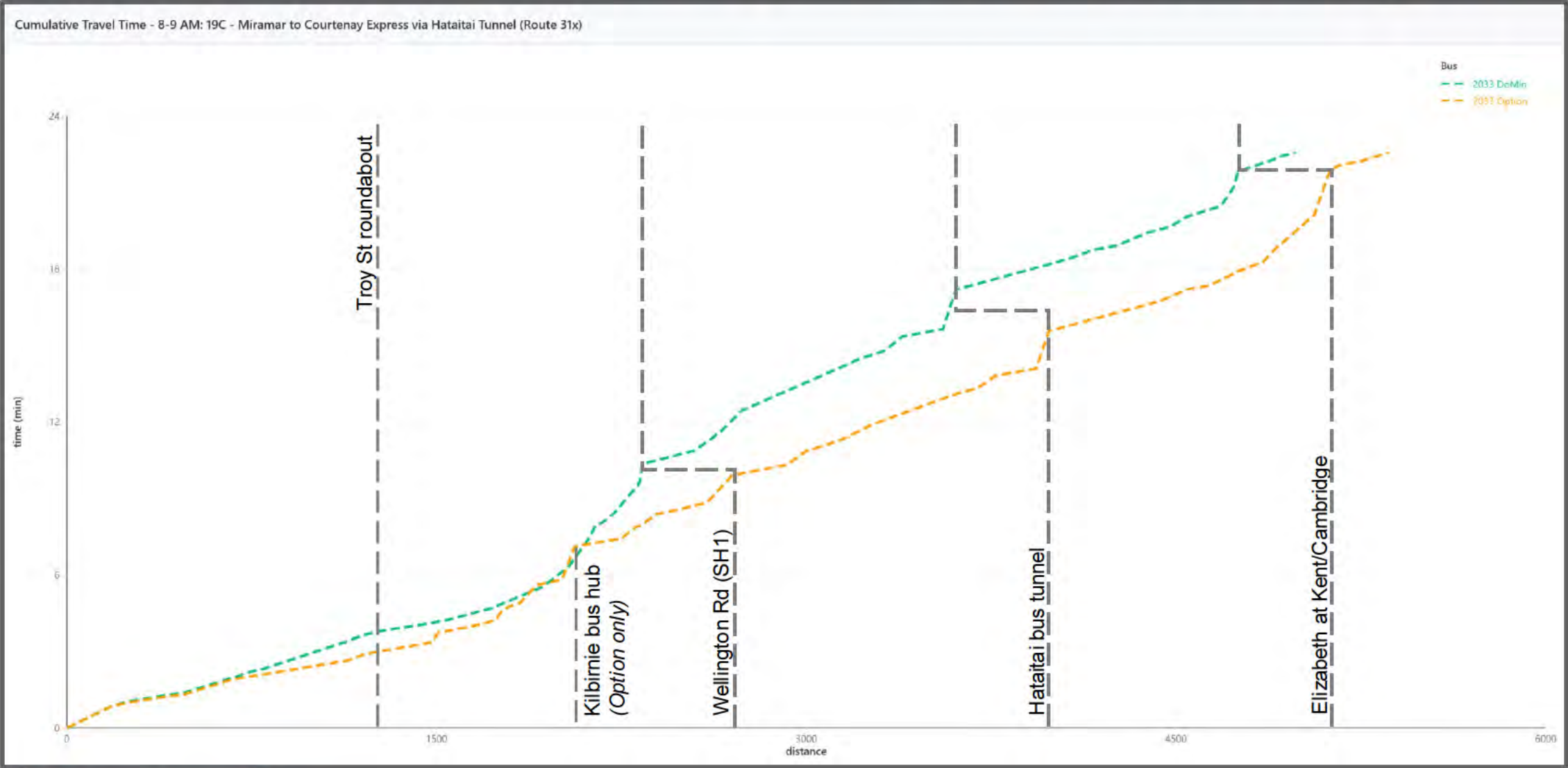
Average bus travel time (mins): AM peak hour (8-9am)

Route section	Do Min (2033)	Option (2033)	Difference
Miramar town centre to SH1 (at Troy St roundabout)	3.8	3.0	-0.8 (21%)
SH1 (at Troy St roundabout) to Wellington Rd (SH1)	6.5	7.0	+0.5 (+8%)
Wellington Rd (SH1) to Hataitai town centre	4.5	3.3	-1.2 (-27%)
Hataitai town centre to Pirie St (at Brougham St)	4.6	4.7	+0.1 (+2%)
Pirie St (at Brougham St) to CBD (Courtenay PI)	3.2	4.6	+1.4 (+44%)
Total	22.6	22.6	None

Note: Travel times taken from Aimsun model output from 21 May 2026.

- Negligible overall change in travel time between the Do Min and Option scenarios
- Increase in travel time rerouting through Kilbirnie
- Travel time savings along Moxham Ave through Hataitai
- Increase in travel time through Mount Victoria on Elizabeth St at the Kent/Cambridge intersection; this will need to be a key intersection of focus as the design is progressed

Route 30x/31x: Inbound (Miramar to Courtenay PI)



Route 30x/31x: Outbound (Courtenay PI to Miramar)



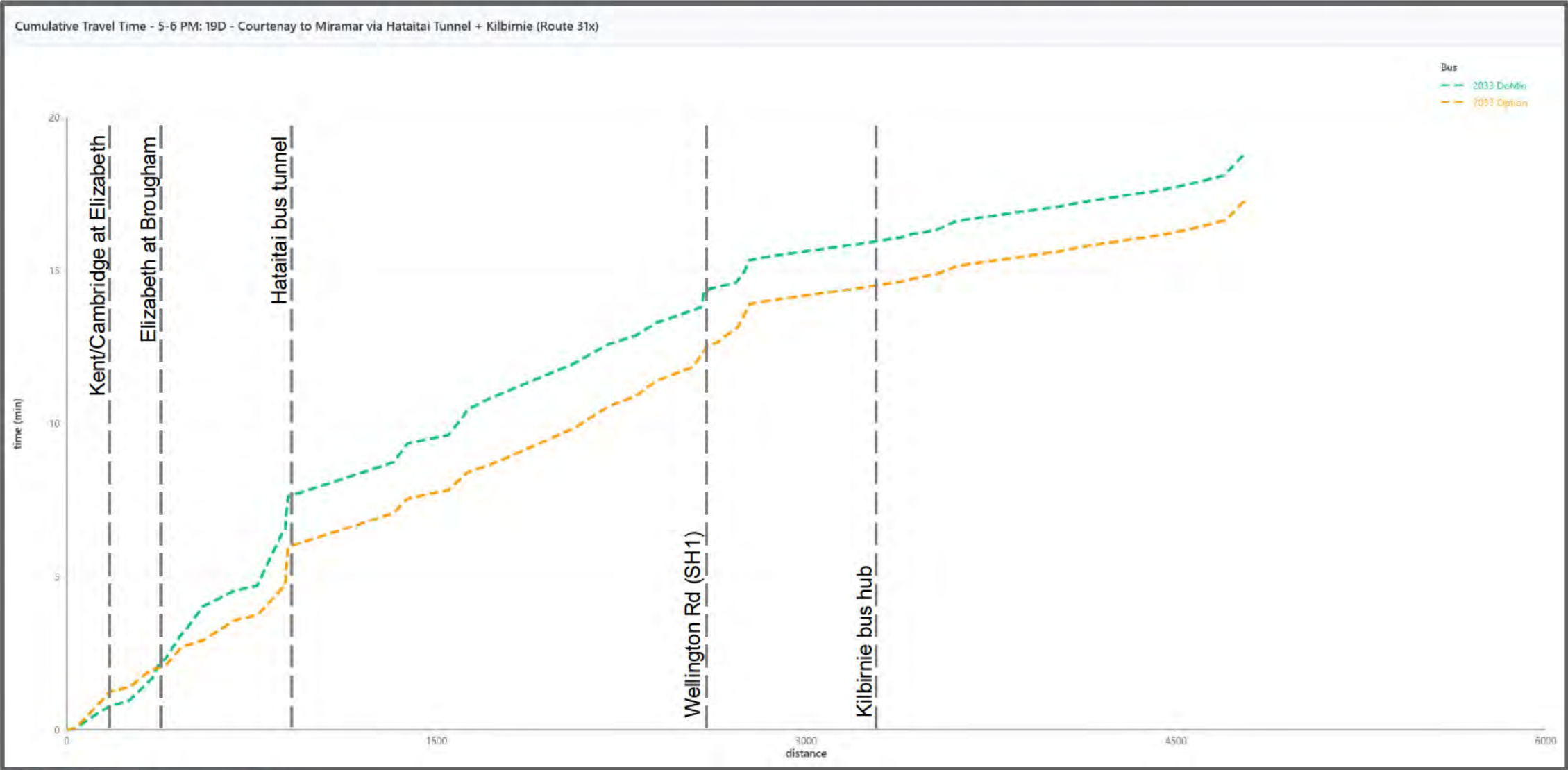
Average bus travel time (mins): PM peak hour (5-6pm)

Route section	Do Min (2033)	Option (2033)	Difference
CBD (Courtenay PI) to Brougham St (at Pirie St)	4.0	2.9	-1.1 (-28%)
Brougham St (at Pirie St) to Hataitai town centre	6.3	5.4	-0.9 (-14%)
Hataitai town centre to Wellington Rd (SH1)	4.0	4.1	+0.1 (+2%)
Wellington Rd (SH1) to SH1 (at Troy St roundabout)	2.3	2.7	+0.4 (+17%)
SH1 (at Troy St roundabout) to Miramar town centre	2.2	2.2	None
Total	18.8	17.3	-1.5 (-8%)

Note: Travel times taken from Aimsun model output from 21 May 2026.

- Overall decrease in travel time from Do Min to the Option scenario
- Majority of travel time savings occur through Mount Victoria
- Some increase in travel time on SH1 on approach to the Evans Bay Pde intersection

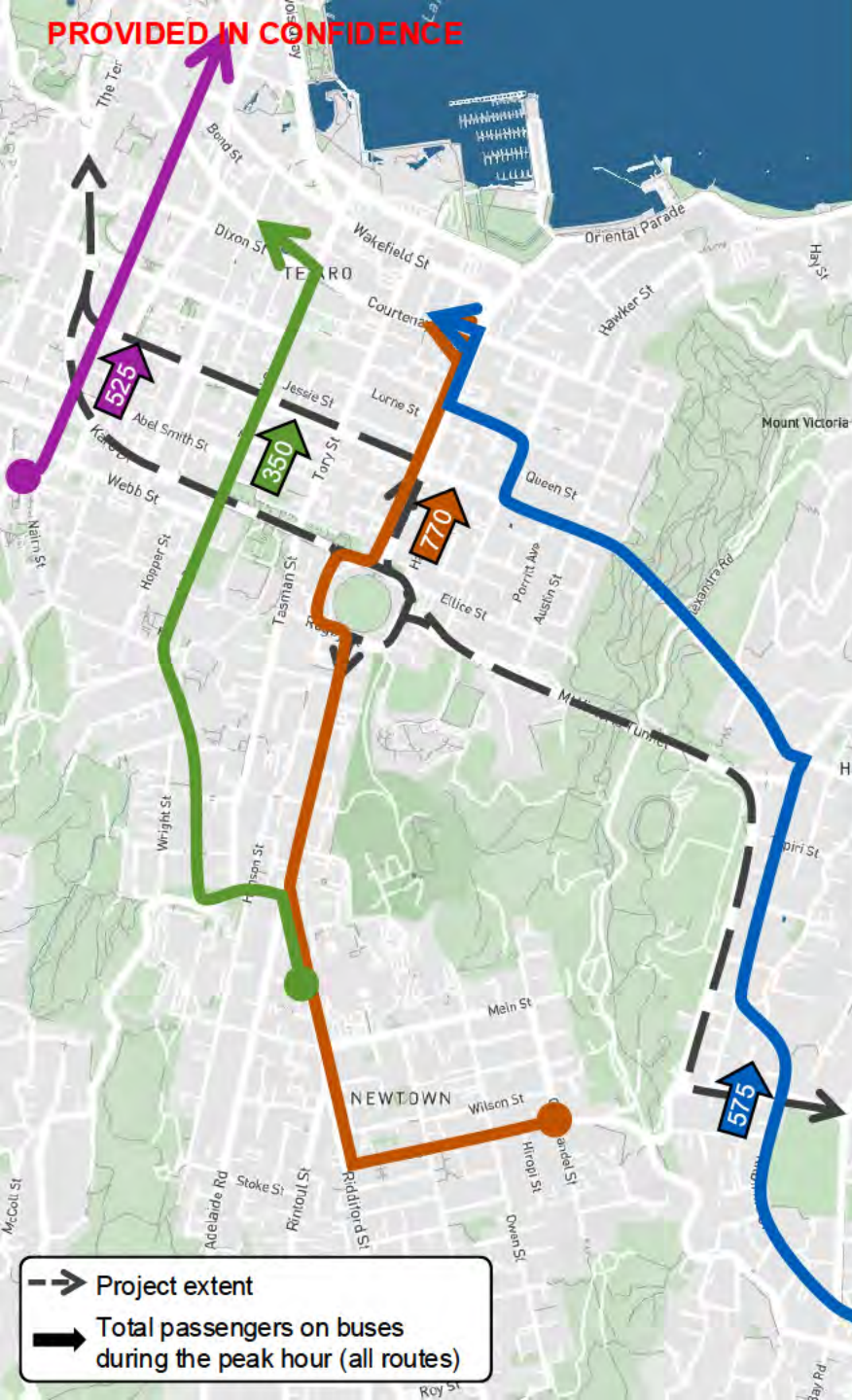
Route 30x/31x: Outbound (Courtenay Pl to Miramar)



Bus travel time impacts:

Bus Priority Action Plan (BPAP) corridors as agreed with GWRC

PROVIDED IN CONFIDENCE



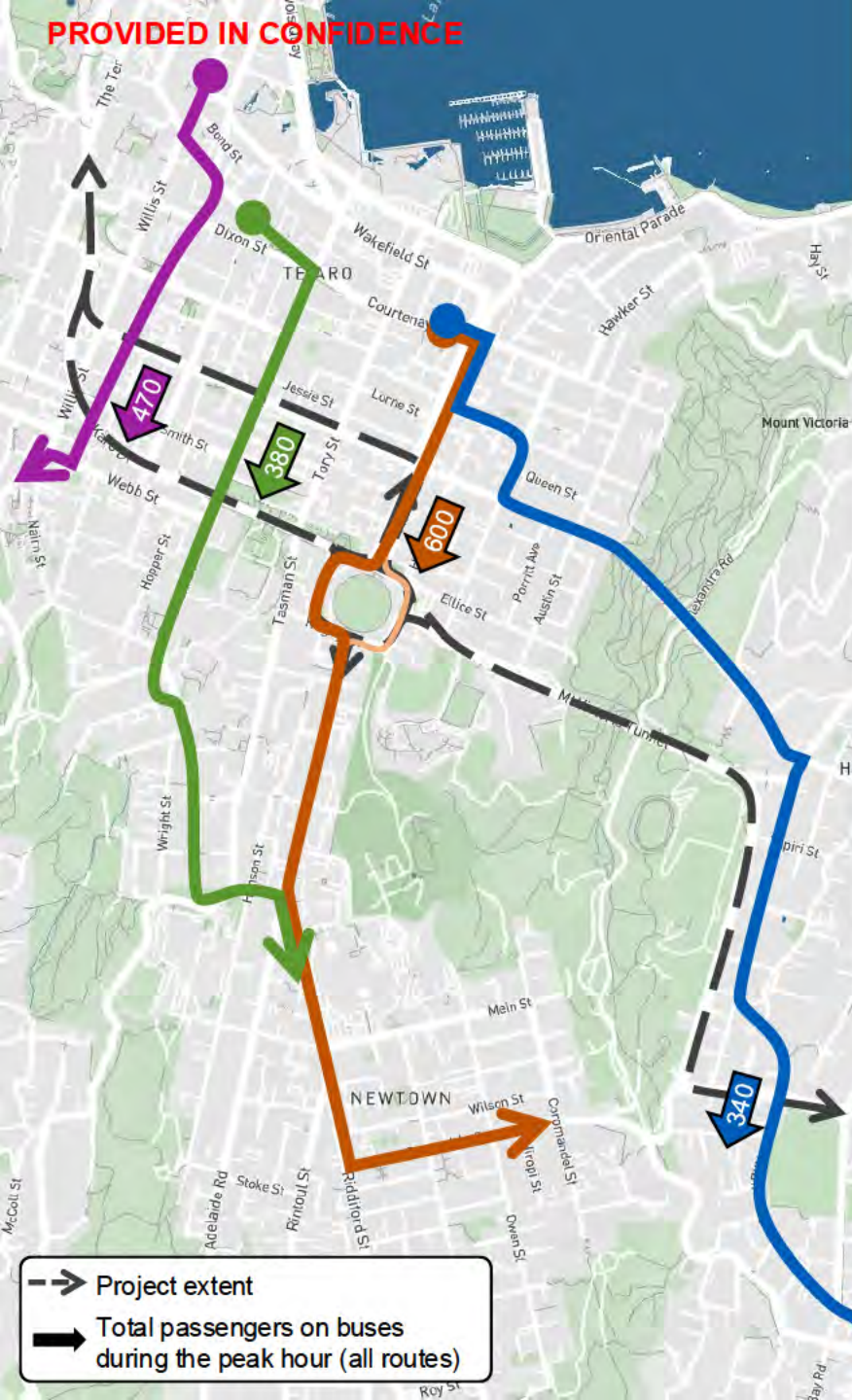
BPAP Corridors: Inbound

Average bus travel time (mins): AM peak hour (8-9am)

BPAP corridor	Bus route	Section	Observed (2025) ¹	Forecast (2033) ²		Difference (Do Min to Option)
				Do Min	Option	
Willis St/Victoria St	Route 7	Brooklyn Rd at Naim St to Willis St at Lambton Quay	5.4	11.0	12.4	+1.4 (+13%)
Mount Cook to City	Route 3	Wellington Hospital to Manners St at Cuba St	14.2	14.0	15.2	+1.2 (+9%)
Newtown to City	Route 4	Constable St at Coromandel St to Courtenay Place	12.8	14.1	12.3	-1.8 (-13%)
Miramar to City	Route 2	Miramar Shops to Courtney Place	23.2	24.1	22.6	-1.5 (-6%)

Note 1: Travel times taken from NetBI, based on observed bus travel times.

Note 2: Travel times taken from Aimsun model outputs from 21 May 2026 and 4 June 2026.



BPAP Corridors: Outbound

Average bus travel time (mins): PM peak hour (5pm-6pm)

BPAP corridor	Bus route	Section	Observed (2025) ¹	Forecast (2033) ²		Difference (Do Min to Option)
				Do Min	Option	
Willis St/Victoria St	Route 7	Willis St at Mercer St to Brooklyn Rd at Nairn St	9.0	10.2	7.3	-2.9 (-28%)
City to Mt Cook	Route 3	Manners St at Cuba St to Wellington Hospital	13.0	13.9	13.2	-0.7 (-5%)
City to Newtown	Route 4	Courtenay Place to Constable St at Coromandel St	16.9	11.9	12.8	+0.9 (+8%)
City to Miramar	Route 2	Courtney Place to Miramar Shops	18.6	21.2	20.4	-0.8 (-4%)

Note 1: Travel times taken from NetBI, based on observed bus travel times.

Note 2: Travel times taken from Aimsun model outputs from 21 May 2026 and 4 June 2026.

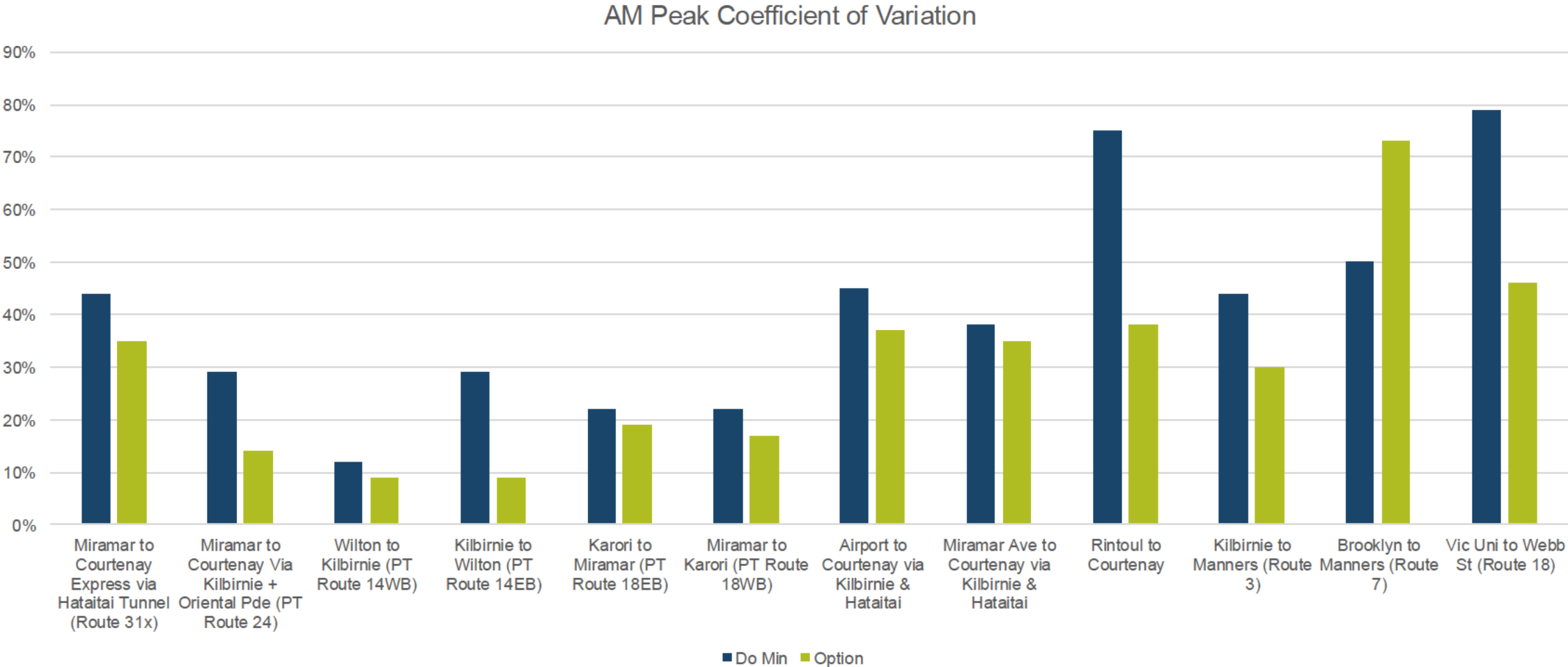


Project extent
 Total passengers on buses during the peak hour (all routes)

Bus travel time impacts: Travel time variability

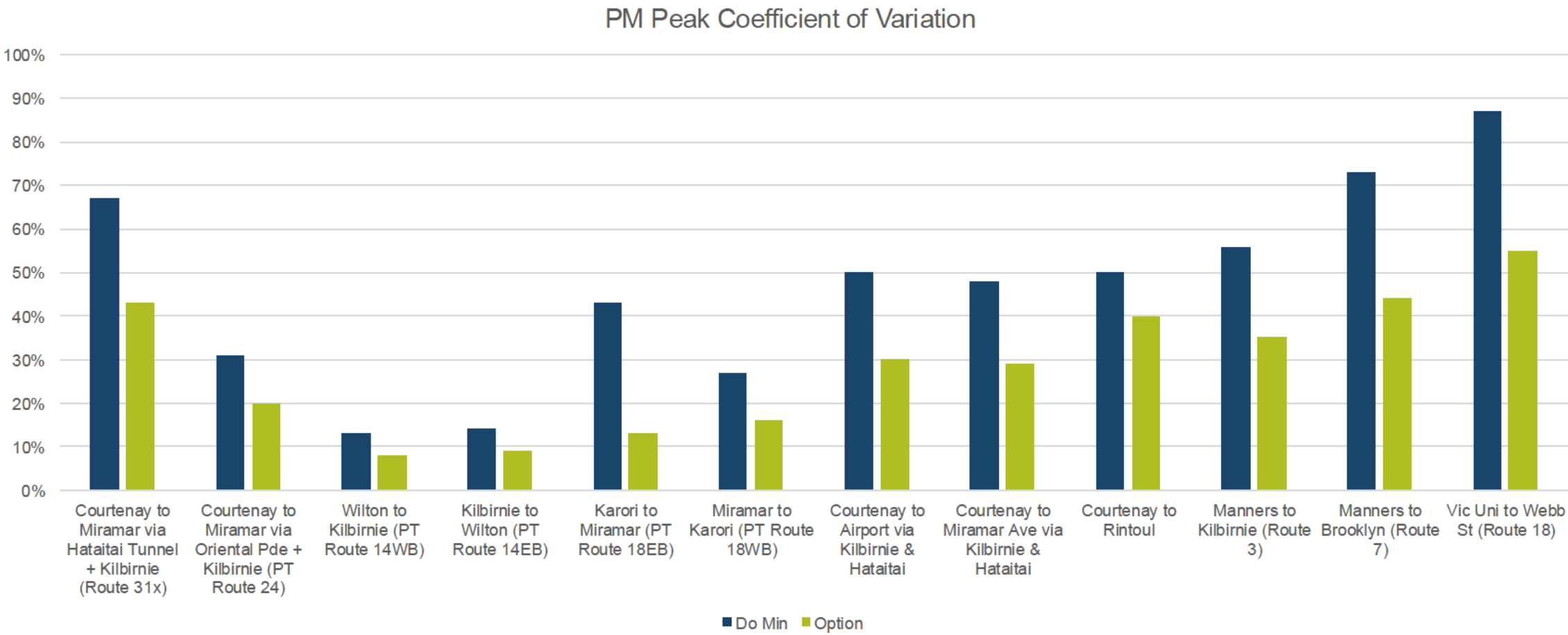
Travel time variability: Inbound AM peak

Transport model standard deviation analysis of travel times worse than “average” shows that variability generally reduces



Travel time variability: Outbound PM peak

Transport model standard deviation analysis of travel times worse than “average” shows that variability reduces



Eastern express bus analysis and future opportunities



Eastern express bus services and future opportunities (Inbound)

Average express bus travel time (mins)

AM peak hour (8-9am)

Calabar roundabout to Courtney Pl.

Express route option	Future minutes	Difference (compared to current route)
Via Hataitai bus tunnel, with a stop in Kilbirnie (eg Airport Express with project)	20.4 (travel time with project)	Note this is around 2 minutes faster than without the project due to existing delays in Hataitai
Via the Mount Victoria tunnel, with a stop in Kilbirnie (eg Airport Express exiting Kilbirnie via Evans Bay Parade)	16.2	4.2 minutes faster (or 6 minutes compared to without the project)
Via Hataitai bus tunnel, no stop in Kilbirnie (eg 30/31X adjusted route)	15.9	Note this is around 2 minutes faster than without the project.
Via the Mount Victoria tunnel, no stop in Kilbirnie (eg 30/31X direct)	12.6	3.3 minutes faster by avoiding Hataitai

Note: Travel times taken from Aimsun 2033 model output from 21 May 2026.



Eastern express bus services and future opportunities (Outbound)

Average express bus travel time (mins)

PM peak hour (5-6pm)

Courtney Place to Calabar roundabout.

Express route option	Future minutes	Difference (compared to current route)
Via Hataitai bus tunnel, with a stop in Kilbirnie (eg Airport Express with project)	18.4 (travel time with project)	Note this is around 1 minutes faster than without the project due to existing delays in Hataitai.
Via the Mount Victoria tunnel, with a stop in Kilbirnie (eg Airport Express exiting Kilbirnie via Evans Bay Parade)	13.4	5 minutes faster (or 6 minutes compared to without the project)
Via Hataitai bus tunnel, no stop in Kilbirnie (eg 30/31X adjusted route)	15.7	Note this is around 1 minutes faster than without the project.
Via the Mount Victoria tunnel, no stop in Kilbirnie (eg 30/31X direct)	10.4	5.3 minutes faster by avoiding Hataitai

Note: Travel times taken from Aimsun 2033 model output from 21 May 2026.

Check of planned bus detour routes in response to road closures

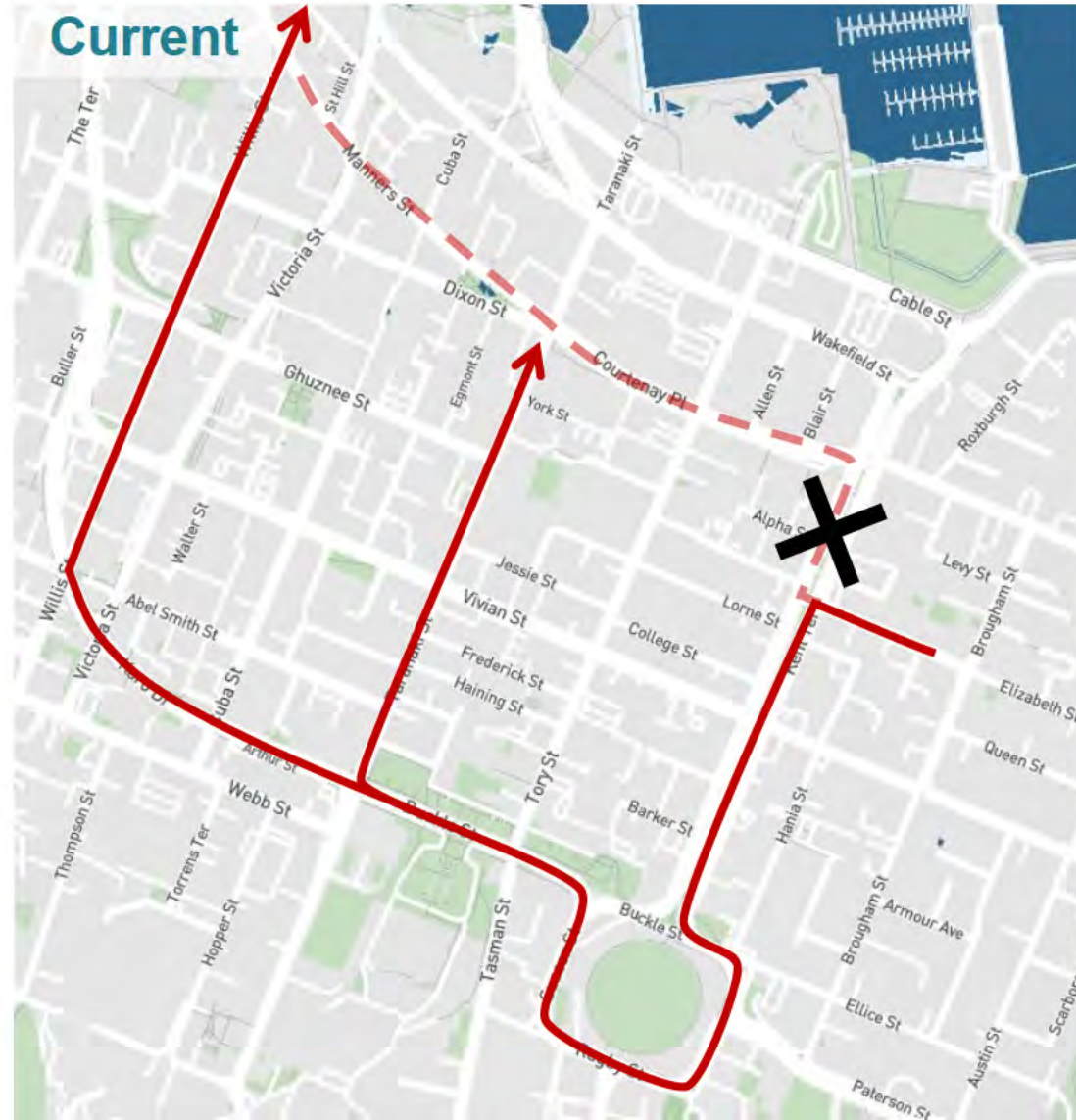
Bus detour routes if Cambridge Tce closed for an incident

Scenario:

- **Service:** Route 2 inbound
- **Closure:** Cambridge Tce between Elizabeth St and Courtenay Place

Option enabled route:

- Detour continues around the Basin, but now in an anti-clockwise direction
- Slightly further and slightly longer in time via new Sussex link



Option



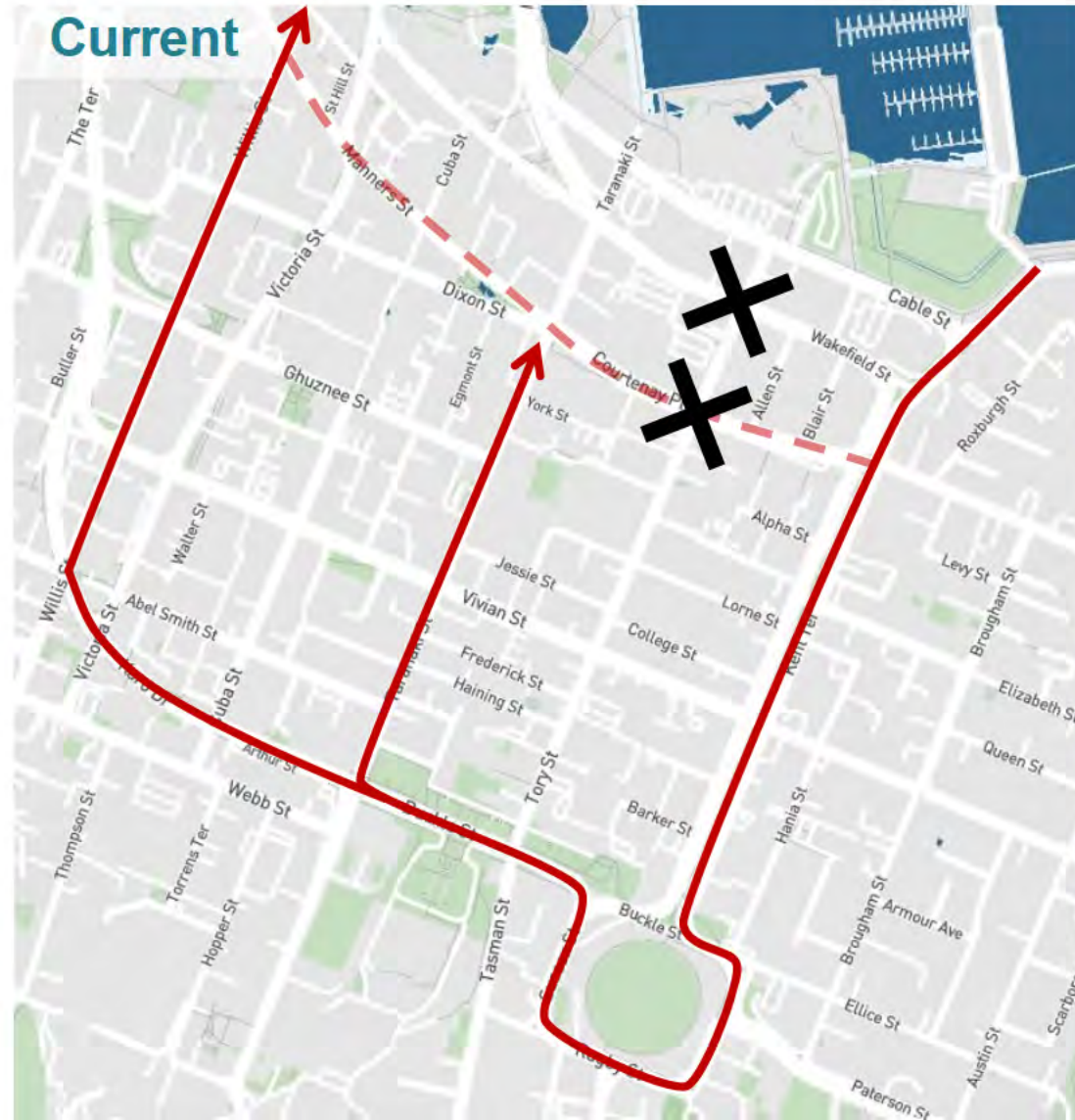
Bus detour routes if Courtney or Wakefield closed for an incident

Scenario:

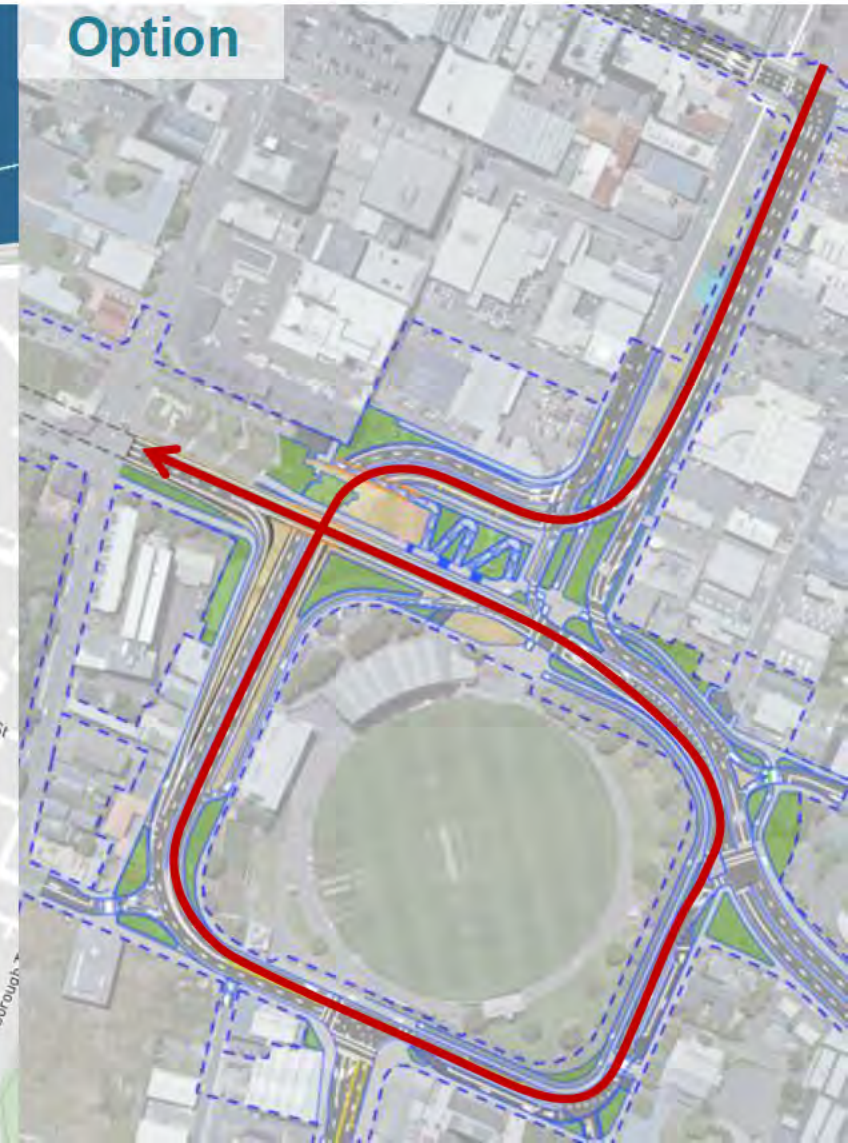
- **Services:** Inbound from Elizabeth / Oriental Bay / Majoribanks
- **Closure:** Courtney Place and Wakefield St

Option enabled route:

- Detour continues around the Basin, but now in an anti-clockwise direction
- Slightly further and slightly longer in time via new Sussex link



Option



By Fast Track Portal

24 August 2026

EPA File ref: FTAA-2607-1272

██████████
██████████ Fast-track Applications
Environmental Protection Authority
Private Bag 63002
Wellington 6140

Dear ██████████

Re: Response to s46 FTAA consultation - State Highway 1 Wellington Improvements substantive application [FTAA-2607-1272]

Thank you for your letter dated Monday 17 August 2026 seeking Wellington City Council's (Council's) input on the completeness and scope of the substantive application made by the New Zealand Transport Agency Waka Kotahi (NZTA) for the State Highway 1 Wellington Improvements project (the Project) under the Fast-track Approvals Act 2024 (the Act).

Consultation under section 46 of the Act

Council officers have undertaken a cross-Council review of the application documents available through the Fast Track Portal to assist the EPA with its assessment under section 46 of the Act.

Council has approached this review as a completeness assessment rather than an assessment of the merits of the application. This is consistent with the Panel Conveners' Practice and Procedure Guidance, which distinguishes the local authority role under section 46 from the subsequent substantive assessment and commenting process.

The **attached** Table 1 identifies the specific information gaps identified by Council specialists and the further information that Council considers should be provided. Council has sought to focus this response on matters where information appears to be absent or insufficiently developed to enable the application and its proposed effects-management framework to be properly understood. There are other matters on which Council may have concerns regarding the adequacy of the assessment, proposed mitigation or conditions, but which we consider are more appropriately addressed when Council is invited to comment on the merits of the application.

The principal completeness matters identified through Council's review set out in Table 1 are summarised below.

Structure, coverage and comprehensiveness of the proposed conditions

Council is concerned about the structure, coverage and level of detail of the proposed conditions. These concerns were raised with NZTA during pre-lodgement engagement and remain relevant following the completeness review.

In particular, effects, mitigation measures and subsequent processes identified in the technical assessments are not always clearly reflected in the conditions or management plans. Significant matters are also deferred to future outline plans and management plans without sufficiently defined outcomes, minimum content, consultation, certification and monitoring requirements. Council is therefore concerned that information necessary to understand the proposed effects-management framework is presently missing.

In this respect, Council also notes section 19.2 of the Conveners' Guidance, which recommends pre-lodgement engagement with relevant local authorities to achieve alignment on conditions and expressly identify areas of disagreement. The Council received a set of draft conditions prior to lodgement however consultation on areas of alignment and disagreement was not undertaken pre-lodgement.

Management plans

Related to the above, a significant concern is the absence of draft management plans identified in the draft designation conditions to manage the effects of the project.

This is particularly relevant given the scale, complexity and likely duration of the project and the extent to which the proposed conditions defer the detailed management of effects to future outline plans and management plans. Draft condition DC.3 expressly provides for outline plans and management plans to be prepared in parts or stages, while DC.1 provides that management plans and outline plans may prevail over the application drawings and supporting information included with the application where there is an inconsistency. The Council questions whether this is lawful.

Council notes in particular sections 4.1(e) and 21.1 of the Panel Conveners' Practice and Procedure Guidance, which recommend that, where conditions rely on management plans, a substantive application include draft management plans or sufficient information about their purpose, structure, content and drafting process, so that the Panel can have confidence that the plans will be sufficient to address identified adverse effects. The Guidance also identifies mechanisms such as performance standards, monitoring, certification, mandatory implementation and local authority monitoring as means of providing greater certainty. However, the application doesn't include draft management plans or, from the Council's view, otherwise provide sufficient information about their proposed content and preparation.

In this respect, the proposed conditions contemplate a substantial suite of Management Plans and related management documents, including:

- Cultural Monitoring Plan
- Urban and Landscape Design Management Plan
- Construction Traffic and Transport Management Plan
- Construction Noise and Vibration Management Plan
- Avifauna Management Plan
- Lizard Management Plan
- Construction Air Quality Management Plan
- Contaminated Soils Management Plan
- Site-Specific Soil Management Plan
- Erosion and Sediment Management Plan
- Site-Specific Erosion and Sediment Control Plans
- Groundwater and Settlement Monitoring Contingency Plan
- Heritage Construction Management Plan

- Water Treatment Management Plan
- Long Term Site Management Plans

In some instances, the conditions provide some indication of their purpose or intended content, but in others there is insufficient information to understand the proposed management framework or the process by which the relevant plan will be developed, consulted on, certified or otherwise overseen.

Council's review has also identified areas where additional management plans will be necessary but are not provided for by the current suite of conditions, including management of network utilities affected by construction (typically covered by a Network Utilities Management Plan or similar), and a Parks and Reserves Management Plan).

Council therefore considers that the application should include the missing draft management plans, or sufficient information consistent with sections 4.1(e) and 21.1 of the Conveners' Guidance.

Other information gaps

The attached table identifies the remaining identified information gaps. These span a number of technical disciplines and include, among other matters, missing or referenced-but-unprovided technical information, construction phasing and transition information, transport modelling and construction-network information, recreation and open-space effects, arboricultural information, heritage documentation, ecological management information, and clarification of approvals and processes associated with Council land and assets.

Several of these matters are relatively discrete and should be capable of being addressed through the provision or clarification of existing information. Others are more significant as the missing information is relied upon by the application to explain the effects of the project or how those effects will subsequently be managed.

Council also notes that Tiaki Wai has not been separately consulted through the s46 completeness process, despite being the relevant three-waters infrastructure entity and despite the significant interaction between the Project and existing three-waters infrastructure. While Tiaki Wai (as Wellington Water Limited) provided technical input during pre-lodgement engagement, this occurred relatively late, and it is unclear to what extent that input has been reflected in the lodged application. The Council believes Tiaki Wai could have a valuable role in the s46 completeness process and strongly recommends Tiaki Wai is invited to participate under section 53.

The attached table should be read as Council's detailed response identifying those matters and the information sought. Where it is unclear if an item should be considered as a completeness matter or a substantive matter, the Council has taken a cautious approach and included the item in the table to ensure the EPA can consider all potential matters in its assessment of s46.

Next steps

Council recognises the scale and complexity of the Project and the considerable body of technical material that has been prepared to support the Fast-track application.

Council is keen to continue working constructively with the EPA and NZTA to clarify and address the identified information gaps. In particular, Council would welcome direct engagement with NZTA where this would assist in efficiently resolving completeness matters, including clarification of

existing application material, provision of missing documents, and further development of the management plan and conditions framework.

Council's identification of these matters at this stage is intended to assist this process and to ensure that, if the application proceeds to substantive consideration, the Panel and participating agencies have an adequately developed information and effects-management framework on which to undertake that assessment.

Please do not hesitate to contact me if you have any questions regarding this response or the matters identified in the attached table.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Duindam', is placed over a light grey rectangular background.

Michael Duindam
Manager District Planning

Email: [REDACTED]

Attachment 1: Table 1 – Wellington City Council Completeness Review pursuant to s46 FTAA

Table 1 – Wellington City Council Completeness Review pursuant to s46 FTAA

	Technical document	Doc section (if relevant)	Missing information	Information Request
1	Part B.02 - Appendix A - Proposed Conditions	N/A	The proposed conditions lack sufficient structure, coverage and detail. Effects, mitigation measures and subsequent processes identified in the technical assessments are not always clearly reflected in the conditions or management plans. Significant matters are also deferred to future outline plans and management plans without sufficiently defined outcomes, minimum content, consultation, certification and monitoring requirements.	Provide a more comprehensive conditions framework that clearly translates identified effects, mitigation measures and subsequent processes into conditions and management plan requirements, including sufficiently defined outcomes, minimum content, consultation, certification and monitoring requirements.
2	Part B.02 - Appendix A - Proposed Conditions	N/A	Draft management plans identified in the proposed designation conditions have not been provided. Given the extent to which the conditions defer detailed effects management to future outline plans and management plans, the application does not otherwise provide sufficient information about their purpose, structure, content and drafting process to understand the proposed management framework or how the plans will be developed, consulted on, certified or otherwise overseen.	Provide the missing draft management plans or sufficient information about their purpose, structure, content and drafting process, consistent with sections 4.1(e) and 21.1 of the Panel Conveners' Practice and Procedure Guidance.
3	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Section 9 – Construction Effects	The assessment identifies construction-related social effects but does not assess the potential effects of construction staging, access changes, parking loss and traffic management measures on central city businesses and relative commercial activity within affected precincts. Although construction methodologies are described elsewhere, the Social and Recreation Impact Assessment does not evaluate how these effects may influence business viability, people movement and city centre functioning during construction.	Provide further assessment of construction-period impacts on affected business areas, including the likely duration of disruption, customer access impacts and proposed mitigation measures to maintain business activity.
4	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Section 9 – Construction Effects	The assessment does not evaluate potential effects on city centre vitality arising from changes to pedestrian movement, visitor behaviour and accessibility during construction. While key destinations and activity centres are identified, there is limited analysis of how construction activities may affect city centre attractiveness, visitation and public use of central city spaces.	Provide assessment of likely impacts on city centre visitation, pedestrian activity and public use of central city destinations during construction, including any proposed monitoring or mitigation measures.
5	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Section 9 and Section 10	The assessment identifies Te Aro, the CBD and other key destinations as important centres for employment, retail, hospitality and recreation activity. However, potential effects on these precincts have not been assessed at a precinct scale. It is unclear whether specific business, visitor or activation impacts are anticipated within key central city destinations.	Provide a precinct-based assessment of impacts on key central city destinations, including the CBD, Te Aro, Courtenay precinct and Basin Reserve area.
6	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Construction Effects and Mitigation Sections	Traffic diversions, access staging and temporary restrictions are discussed in supporting technical reports, but the assessment does not clearly identify mitigation measures aimed at maintaining city centre business activity, customer access, visitor confidence or commercial vitality during construction.	Provide a business and city centre mitigation framework outlining proposed engagement, wayfinding, access management and business support measures for affected precincts during construction.
7	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Construction Effects and Mitigation Sections	The documentation does not identify the role of the Network Planning Group in the development, review or implementation of traffic management, access management and city centre mitigation measures. It is unclear how Network Planning Group input will be incorporated into detailed design and construction planning.	Clarify the role of the Network Planning Group and how it will be utilised as part of the mitigation framework for construction disruption, including how its input will inform detailed design and construction planning.
8	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Basin Reserve and Key Destinations Assessment	The assessment recognises the significance of the Basin Reserve and other major destinations, but does not assess potential construction-period impacts on other city-significant events or associated visitor expenditure.	Provide assessment of construction-period effects on major event destinations and identify mitigation measures where event access or operation may be affected.

	Technical document	Doc section (if relevant)	Missing information	Information Request
9	Part F.04 Technical Report 4 - Design Assessment	Not specified	A draft UDLMP has not been provided. While the UDL conditions indicate the intended structure and purpose of the UDLMP, there is limited information on its content, including how the Urban Design Principles will be embedded, and the process for preparing the document.	Provide a draft UDLMP, or sufficient information on its intended content and preparation process, including how the Urban Design Principles will be embedded and applied.
10	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Not specified	There are 27 floodlights at Hataitai Park serving the sportsfields and courts. The proposal includes removal of the large trees between the sportsfields/courts and Ruahine St. The application does not assess whether removal of this screening vegetation will affect the lighting effects on adjacent residential areas or continued compliance of the existing floodlights.	Provide a lighting assessment detailing the effects of the proposed removal of screening vegetation on the Hataitai Park floodlights and how these existing effects may change at the receiving environment of residential areas east of Ruahine St. Please assess whether the existing floodlights would remain compliant with their resource consents and/or the Lighting Chapter standards in the WCC District Plan.
11	Not specified	Not specified	An Arboriculture Impact Assessment and Tree Protection Methodologies have not been provided for trees within and adjacent to the proposed construction areas.	Provide a Tree Impact Assessment in accordance with AS 4970 - 2009 Protection of Trees on Development Sites, prepared by a suitably qualified arborist. The assessment should identify trees and vegetation to be removed, pruned or retained; provide a tree protection plan; assess nearby tree stands potentially susceptible to windthrow following removal of project-area trees; assess whether trees unable to be retained can be relocated; and, for trees that cannot be retained or relocated, provide a valuation using the Standard Tree Evaluation Methodology.
12	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Not specified	An indicative construction phasing plan and/or Transition Plan has not been provided to show when different parts of the city will be impacted by construction and when they will be released back to the community. This may be linked to the Construction Report or developed through the Network Planning Group.	Provide an indicative construction phasing or transition plan showing when different parts of the city are expected to be affected by construction and when they will be released back to the community.
13	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment and Part B.01 RMA Approvals	Not specified	The application does not provide a City of Melbourne tree valuation assessment to support mitigation for tree loss and replacement across the project corridor.	For mature trees impacted across the project corridor, provide an assessment of general ecosystem services and amenity value using the City of Melbourne methodology to quantify the effects of removal and/or replacement with juvenile trees.
14	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Not specified	The report references the 'CBD to Miramar Parking Management Plan' and 'CBD to Miramar Parking Assessment Report' (pg12), but it is unclear whether these documents have been included with or appended to the Integrated Transport report.	Provide the 'CBD to Miramar Parking Management Plan' and 'CBD to Miramar Parking Assessment Report', or identify where these documents are included within the application material.
15	Part B.01 RMA Approvals	5.2 Resource Consents Sought	The applicant identifies biodiversity offsetting within the Town Belt as being outside the designation, with the District Plan therefore applying, and assesses the associated consent requirements. However, a non-substantive consent trigger has been omitted. For completeness, EW-R5 is triggered by non-compliance with EW-S10 for more than 10 cubic metres of earthworks on the site of a heritage structure (Hataitai Bus Tunnel). This is a technical consent matter and does not raise a substantive effects issue.	Trigger the applicable rule and assess the additional identified consent requirement.

	Technical document	Doc section (if relevant)	Missing information	Information Request
16	Part B.01 RMA Approvals	5.2 Resource Consents Sought	The applicant has omitted potential consent triggers for biodiversity offsetting within the Town Belt and outside the designation. The application assesses these matters against the District Plan generally, indicating that the Infrastructure Chapter is not considered relevant. However, the following may apply: transport of greater than 200 m3 may require consent under EW-R4 and EW-S4; earthworks on a slope greater than 34 degrees (EW-S3), or over 250 square metres in area (EW-S1), may also require consent under EW-R4. Information elsewhere on the biodiversity offset indicates that the relevant area and volume thresholds are likely to be exceeded.	Trigger and assess the identified additional consent requirements.
17	Not specified	Not specified	The application does not provide sufficient information on vehicle access to Hataitai Park during construction for Council asset and operational management, emergency services, lessee building owners, and utility infrastructure owners and operators.	Provide a construction methodology plan for the Goa St overbridge, on and off ramps and Hataitai Park entrance that provides for controlled vehicle access, as required, into Hataitai Park for Council as asset owner/manager, emergency services, lessee building owners and utility infrastructure owners/operators. Include an appropriate requirement for this access to be addressed through the CTMP.
18	Not specified	Not specified	Reserves Act 1977 approvals associated with the proposed temporary construction use of reserve land have not been identified in the application. This may also include use of reserve land for wildlife relocation sites.	Confirm the proposed processes and approvals under the Reserves Act 1977 for temporary construction use of reserve land, including any reserve land proposed for wildlife relocation sites.
19	Part F.21 - Technical Report 21 - Social and Recreation Impact Assessment	Not specified	The application does not demonstrate the feasibility of the proposed realignment of the Hataitai to City Walkway on the northern side of the proposed Mt Victoria tunnel eastern portal.	Provide a plan showing the gradients and components of the proposed realignment of the Hataitai to City Walkway from Taurima St, sufficient to demonstrate that the realignment is feasible.
20	Part B.06 Appendix E	5.2.1	The approvals sought as referenced in Section 5.2.1 of B.01 are not reflected in the table in Appendix E.	Update Appendix E so that the table accurately reflects the approvals sought as referenced in Section 5.2.1 of B.01.
21	Social & Recreation Impact Assessment (SRIA)	Section 5 – Recreation Infrastructure / Section 9 – Construction Effects	The SRIA notes that other sporting infrastructure exists in the network but does not analyse whether these facilities can absorb activity displaced from Kilbirnie Park. Kilbirnie is one of the highest-capacity grounds in the Wellington network, so disruption may have network-wide implications.	Provide a network-wide recreation capacity analysis assessing whether other parks can absorb displaced activity if Kilbirnie Park is reduced, reconfigured or unavailable during construction. The analysis should quantify available field hours, seasonal constraints and code-specific needs, and identify any gaps in alternative provision.
22	Social & Recreation Impact Assessment (SRIA)	Section 5 – Recreation Infrastructure / Section 9 – Construction Effects	The SRIA does not assess the existing underground drainage infrastructure within Kilbirnie Park or how the proposed reconfiguration would affect it. Kilbirnie's drainage system is an integrated, park-wide network, and changes to field layout, levels or the construction footprint may require full-park drainage redesign, potentially taking the entire park out of service rather than only the northern boundary.	Provide an assessment of the existing underground drainage infrastructure within Kilbirnie Park and a technical analysis of how the proposed reconfiguration would affect that system. This should address whether partial works are feasible or full-park drainage redesign would be required, and the implications for seasonal availability, field closures and network-wide scheduling while the work is completed.
23	Part G.01 - General Arrangement Plans (SH1WI-DES-00-GEN-DRG-00110_00130)	Not specified	Heritage items are not identified on the General Arrangement Plans.	Indicate the heritage items on the drawings.

	Technical document	Doc section (if relevant)	Missing information	Information Request
24	Technical Report 4 – Annexure A – Guiding Urban Design Principles	Not specified	The Guiding Urban Design Principles are insufficiently developed to effectively guide subsequent project design. The document does not adequately explain the principles, why they are important, why the selected sections are important or why other sections are not included, or how and why each principle is relevant to each section. This should be read together with the separate urban design comments on the document.	Revise the Guiding Urban Design Principles to: explain each principle and why it is important; explain why the selected sections are important and why other sections are not included; and explain how and why each principle is relevant to each section. The purpose is to establish clear guiding principles rather than assess the project itself. Ensure the Guiding Urban Design Principles are approved first and then referenced in all relevant conditions, lodged reports and future designs/reports.
25	Technical Report 8 - Historic Heritage Assessment	3. Assessment Framework	For a complex project of this scale, it would be expected for at least draft versions of the Heritage Standard Management Protocol, Conservation Plans and Heritage Construction Management Plans to be provided with the application.	Provide draft Heritage Standard Management Protocol, Conservation Plans and Heritage Construction Management Plans.
26	Technical Report 8 – Annexure A: Mapped Extent of Assessment as emphasise the	Figure 1 - Scope of my assessment – (1) Terrace Tunnel (page 94 report)	The map in Figure 1 is the Proposed District Plan rather than the Operative 2024 District Plan.	Update the map in Figure 1 and confirm whether Figures 2 and 3 use the Operative 2024 District Plan.
27	Part F.10 - Technical Report 10 - Terrestrial Ecology Assessment	Not specified	The REMP is generally complete and incorporates several WCC and DOC suggestions. However, the Avian Management Plan has not been submitted, which is important given the Mt Victoria tunnel area is a known kākā breeding site. The REMP also gives limited consideration to other conservation actions and does not identify community engagement beyond mana whenua. Predator Free Wellington is undertaking significant operations in the project area and should be consulted before works start, as project works may delay its operations; collaboration is important to maintain gains in pest-animal reduction. Confirmed ornate skinks have recently been identified in Kumototo Reserve near the northern Terrace Tunnel entrance and this should be reflected in the REMP and LMP. iNaturalist data and threatened-species classifications have limitations and wide protection buffers should not be presented as confirmed locations of threatened plants or animals. Indigenous specimen trees should be replaced at 1:3 with the same species. For threatened plants, there should be an opportunity to collect seed, take cuttings and translocate plants where possible before removal. Not all felled exotic trees need to be retained; only some should be retained. The project-area maps include part of Kumototo Reserve, but this reserve is not identified in the reports and the intended works in this area are unclear.	Provide the Avian Management Plan. Update or clarify the REMP and associated ecological management framework to: recognise the known kākā breeding context near the Mt Victoria tunnel; address engagement and coordination with Predator Free Wellington before works commence; reflect confirmed ornate skinks in Kumototo Reserve in the REMP and LMP; appropriately qualify use of iNaturalist data and threatened-species location information; provide for 1:3 same-species replacement of indigenous specimen trees; provide opportunities to collect seed, take cuttings and translocate threatened plants where practicable before removal; clarify that only some, rather than all, felled exotic trees need to be retained; and identify Kumototo Reserve and clarify the works intended within the part of the reserve shown inside the project area.
28	Part F.10.1 – Lizard Management Plan	Not specified	The LMP is generally complete, but should recognise confirmed ornate skinks in Kumototo Reserve and provide for translocation data to be shared with WCC as receiving landowner, as well as DOC.	Update the LMP to recognise confirmed ornate skinks in Kumototo Reserve and require translocation data to be shared with WCC as receiving landowner as well as DOC.
29	Part F.10 - Technical Report 10 - Terrestrial Ecology Assessment		The draft conditions should also be amended so that MWSG and the WCC Parks team are consulted in preparing the AMP; DC 36 aligns with the REMP by including possible relocation of plants and opportunities to salvage or collect seed or cuttings; and the apparent inconsistency between RC 23, which prioritises wetland compensation within the Town Belt, and Appendix C, which maps wetland compensation within Matai Moana, is clarified.	Amend/clarify the draft conditions so that MWSG and the WCC Parks team are consulted in preparation of the AMP; DC 36 provides for possible plant relocation and opportunities to salvage or collect seed or cuttings in alignment with the REMP; and RC 23 and Appendix C are consistent as to the intended location/prioritisation of wetland compensation.

	Technical document	Doc section (if relevant)	Missing information	Information Request
30	Technical Report 5 - Integrated Transport Effects	Para 63	Technical Report 5 (para 63) expressly relies on a traffic modelling report and peer review evidence, but the underlying modelling report is not included with the application. The ITA provides modelling outputs and summaries, but not the underlying report needed to understand the model methodology, validation, assumptions and peer review on which the operational effects assessment relies.	Provide the traffic modelling report referred to in paragraph 63 of Technical Report 5, including the model methodology, assumptions, calibration/validation information and evidence of peer review relied on in the effects assessment.
31	Technical Report 5 - Integrated Transport Effects	Various	The application does not include a substantive construction traffic modelling report. While Technical Report 5 contains outputs for individual construction scenarios, the underlying construction modelling, assumptions, validation and methodology are not provided. For a project of this scale and duration, this limits the ability to understand the basis for the assessed construction network effects.	Provide the construction traffic modelling report(s), including the modelling methodology, assumptions, validation, construction scenarios and outputs relied on to assess construction traffic and network effects.
32	Technical Report 5 - Integrated Transport Effects	Para 876	The construction assessment does not model the cumulative network effects of overlapping works along the corridor. Paragraph 876 expressly notes that combinations of works have not been assessed. This is significant because the project is expected to have concurrent or overlapping construction activities, whereas the reported modelling assesses disruption from individual components/phases in isolation.	Provide an assessment/model of the cumulative network effects of reasonably foreseeable overlapping construction activities along the corridor, including the assumptions used about construction staging and concurrency, and identify any additional mitigation required as a result.
33	Technical Report 5 - Integrated Transport Effects	Para 868	Paragraph 868 recommends that construction parking demand be addressed through the Construction Traffic and Transport Management Plan (CTTMP), but the proposed CTTMP condition does not expressly require an integrated construction parking assessment or management response. No draft CTTMP or equivalent information is provided showing how construction worker, plant and displaced parking demand will be managed.	Provide a draft CTTMP, or sufficient information consistent with the Panel Conveners' guidance, that includes an integrated construction parking management approach covering worker and contractor parking, plant and construction vehicles, displaced on-street parking/loading, monitoring and mitigation.
34	Technical Report 5 - Integrated Transport Effects	Various	Draft management plans have not been provided. The Panel Conveners' guidance at 4.1(e) recommends that substantive applications include draft management plans or sufficient information on their purpose, structure, content and drafting process. For transport, the absence of a draft CTTMP and other relevant management plans makes it difficult to understand how identified construction and operational transport effects will be managed.	Provide the draft transport-related management plans, including the CTTMP, or sufficient information for each plan on its purpose, structure, required content, preparation process, consultation/certification, implementation, monitoring and review, consistent with paragraph 4.1(e) of the Panel Conveners' guidance.
35	Technical Report 5 - Integrated Transport Effects	Various	DC.3 establishes a generic Outline Plan/Management Plan framework but does not identify the full suite of management plans expected for the project or provide sufficient detail on their preparation, content, consultation/certification and implementation. The transport conditions are particularly limited given the scale and duration of the project, and do not provide a complete framework linking identified transport effects and mitigation to subsequent management plans.	Provide a complete schedule of the Management Plans required under DC.3 and revised conditions setting out, for each relevant transport plan, its purpose, minimum content, preparation and consultation requirements, certification/approval process, implementation, monitoring and review requirements.
36	Technical Report 5 - Integrated Transport Effects	Various	The parking assessment is incomplete. The material largely identifies the number of spaces removed and refers generally to alternative parking capacity, rather than assessing existing demand, available capacity, displacement effects and where existing users will transition. This includes permanent and construction-related parking and loading changes, including effects in Te Aro and around Hataitai/Moxham Avenue. The application does not provide an integrated parking/loading transition or management plan.	Provide a comprehensive parking and loading assessment and management response for both construction and operation. This should quantify parking/loading losses and demand, identify available replacement capacity and likely displacement, explain where affected users will transition, and set out any transitional or permanent mitigation and monitoring required.

	Technical document	Doc section (if relevant)	Missing information	Information Request
37	Technical Report 5 - Integrated Transport Effects	Paras 643–645	Technical Report 5 (paras 643-645) places substantial reliance on the Network Planning Group (NPG) to coordinate and manage construction and network effects. However, the NPG has no corresponding condition or management plan giving it a formal role in the approval framework. Information is also insufficient on its governance, decision-making authority, roles and responsibilities, performance metrics, funding and responsibility for implementing or paying for required network mitigation.	Provide a condition and/or management-plan framework formally establishing the NPG, including its purpose, membership, governance and decision-making arrangements, roles and responsibilities, performance/KPI framework, monitoring and reporting, funding arrangements, and responsibility for implementing and funding network mitigation.
38	Technical Report 5 - Integrated Transport Effects	Various	The application does not provide a sufficiently developed network management framework for construction and post-construction changes to the local and public transport networks. In particular, it does not clearly identify the operational changes that may be required to bus routes, stops, timetables and service kilometres/hours, how these changes will be developed and implemented, or who will meet the resulting costs incurred by Metlink/GWRC and other road controlling authorities.	Provide a network management plan or equivalent information identifying construction and post-construction changes required to the public transport and local road networks, including effects on routes, stops, timetables, service kilometres/hours and customer information, together with responsibilities, implementation processes and funding arrangements for those changes.
39	Technical Report 5 - Integrated Transport Effects	Para 943	The assessment identifies disruption and closure of the existing walking and cycling connection through/around the Mt Victoria tunnel works (including para 943), but does not adequately describe how safe and practical walking and cycling connectivity between Hataitai and Mt Victoria will be maintained during construction. There is no corresponding condition or management-plan requirement securing this outcome.	Provide an assessment of construction effects on walking and cycling connectivity and a corresponding condition/management-plan requirement that secures safe and practical walking and cycling access between Hataitai and Mt Victoria throughout construction, including any temporary routes and detours.
40	Technical Report 5 - Integrated Transport Effects	Table 89	Table 89 of Technical Report 5 summarises a range of recommended operational and construction transport mitigations. The proposed conditions do not systematically translate those recommended mitigations into enforceable requirements, including matters such as safe-system responses, network mitigation, monitoring and construction measures. This leaves uncertainty as to which mitigations form part of the project and how they will be secured.	Provide revised conditions that identify and secure the mitigation measures recommended in Table 89 of Technical Report 5, or otherwise clearly explain for each recommended mitigation how it will be required, implemented, monitored and enforced.
41	Technical Report 5 - Integrated Transport Effects	Various	The assessment of construction effects on public transport operation is insufficiently developed. This includes the effects of major construction activities such as the Ghuznee Street bridge works and Basin-area changes on bus routing, bus travel times, reliability, stop access and service continuity. The application does not provide sufficient information to understand the level of service that can be maintained or the mitigation required.	Provide a more complete assessment of construction effects on public transport operations, including the Ghuznee Street bridge and Basin-area works, and identify how bus routes, stops, travel times, reliability and service continuity will be maintained or mitigated. The response should be reflected in the CTMP and associated conditions.
42	Technical Report 5 - Integrated Transport Effects	Appendix G	Appendix G records WCC's earlier concerns on the Design Freeze 2 transport assessment, but the application does not clearly explain how a number of those concerns have been resolved. More generally, Technical Report 5 relies on the NPG to address future network effects without a corresponding approval mechanism setting out how the NPG will operate, what outcomes it must achieve, and how its recommendations will be implemented.	Provide a response identifying how the outstanding transport matters recorded through pre-lodgement engagement/Appendix G have been addressed in the final application. Where reliance is placed on the NPG, provide the corresponding conditions or management-plan provisions that secure its role and implementation of required measures.
43	Technical Report 5 - Integrated Transport Effects	Various	The application provides little information on the proposed state highway revocation process and the future transfer of existing or altered state highway/local road assets to WCC. Given the scale of changes around the Basin Reserve and elsewhere, the application does not set out the intended revocation strategy, timing, standards for assets to be transferred, or the process for Council review and acceptance.	Provide a revocation strategy setting out the roads/areas proposed to be revoked or transferred, anticipated timing, asset and condition standards, the process for WCC involvement and acceptance, and how any consequential local-network works will be agreed and delivered.

	Technical document	Doc section (if relevant)	Missing information	Information Request
44	Technical Report 5 - Integrated Transport Effects	Various	The designation footprint extends over parts of the local road network and may remain in place for a lengthy construction/staging period. The application does not clearly explain the respective roles, powers and responsibilities of NZTA and WCC for operating and managing local roads within the designation during this period, including traffic resolutions, temporary traffic management, public transport facilities, access and other road-controlling-authority functions.	Clarify the respective NZTA and WCC roles and road-controlling-authority responsibilities for local roads within the designation during construction/staging and after completion, including authority for traffic resolutions, temporary traffic management, access, public transport infrastructure and network changes.
45	Technical Report 5 - Integrated Transport Effects	Various	The application does not provide an asset handover framework for new, altered or reinstated transport assets that are intended to become WCC assets. Information is missing on which assets will transfer, the required condition/standard at handover, design and acceptance processes, as-built and maintenance information, defect responsibilities and timing of transfer.	Provide an asset handover plan/framework identifying assets intended to transfer to WCC, applicable design and construction standards, Council review and acceptance processes, handover documentation and as-builts, defect/maintenance responsibilities and timing.
46	Technical Report 5 - Integrated Transport Effects	Various	The application does not clearly define the long-term ownership, operational and maintenance boundaries between NZTA and WCC for the completed project, including bridges, local roads, service lanes, walking/cycling facilities and areas around the Basin Reserve and Hataitai. This creates uncertainty about future asset responsibility and maintenance obligations.	Provide plans and/or a schedule defining the proposed long-term ownership, operational and maintenance boundaries between NZTA and WCC for all relevant transport assets, together with the process for agreeing and documenting those boundaries before completion/handover.

Department of Conservation advice for EPA compliance assessment

Overview

Project name	State Highway 1 Wellington Improvements
Project applicant	NZ Transport Agency Waka Kotahi (NZTA)
EPA unique ref. no	FTAA-2607-1272
EPA Request Number	CRM:0139019564
Conservation approvals sought	• Wildlife Approval to salvage and relocate indigenous lizards • Wildlife Approval to salvage and relocate kororā
EPA request summary	To inform the EPA's completeness assessment of the application, please provide the Department of Conservation's views on whether the documentation provided by the EPA regarding the above approval/s, as provided by the applicant, meet the requirements of sections 42 and 43 of the Fast-track Approvals Act 2024 (the Act) and has been provided in sufficient detail to satisfy the purpose for which it is required, in accordance with section 44 of the FTAA. In your response, please include: • whether any relevant matters listed in clause 2 of Schedule 7 (information required in application for wildlife approval) have not been addressed or have not been provided in sufficient detail.
Date due to EPA	24 August 2026

On 17/08/2026 the Department of Conservation (DOC) received a request from the EPA seeking its views whether the application meets the requirements of sections 42 and 43 of the Act, and whether the information is in sufficient detail to satisfy section 44 of the Act.

The purpose of this document is to provide advice to assist the EPA in making its decision whether the application lodged by NZTA on 14/08/2026 complies with the requirements of section 46(2) of the Act.

DOC understands that this document will be passed on to the applicant, the Panel Convener and the Panel.

Notification and Consultation

By way of letter received 17 July 2026, the Applicant provided DOC with 20 working days' notice that they would be applying for this Project. However, consultation had begun before the amendments to s29 of the Act to allow for notification, rather than consultation, had come into effect on 31 March 2026.

Engagement by the Applicant commenced in February 2026 and the Applicant has advised that they will continue to engage and consider any DOC feedback post lodgement of the application.

Compliance with information requirements

Our assessment of the information requirements for the relevant approvals is provided in the attached tables. In summary, DOC's advice is that the application meets the requirements of sections 42, 43, and 44 of the Act.

Further observations

In addition to the compliance requirements, DOC makes the following observation:

- The Applicant proposes to prepare an Avifauna Management Plan as a condition of resource consent. The Terrestrial Ecology Assessment that forms part of the application states that the risk of killing or injuring eggs and chicks will be "minimised". It does not proposit that such killing or injuring will not occur, in which case a Wildlife Approval would be necessary.

Application for wildlife approval - Lizards

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N
Schedule 7 clause 2(1) - For the purposes of section 43(3)(h), an application for a wildlife approval must include the following information:			
(a) specify the purpose of the proposed activity:	Y	Part D.01, Section 2	Y
(b) identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land):	Y	Part D.01, Section 3	Y

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Y	Part D.01, Section 4	Y
(d) list protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted:	Y	Part D.01, Section 5	Y
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Y	Part D.01, Section 6	Y
(f) state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Y	Part D.01, Section 7	Y
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Y	Part D.01, Section 8	Y
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):	Y	Part D.01, Section 9	Y
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:	Y	Part D.01, Section 10	Y
(j) list all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site:	Y	Part D.01, Section 11	Y
(k) where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife):	Y	Part D.01, Section 11	Y
(l) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953:	Y	Part D.01, Section 12	Y
(m) state whether the applicant or any company director, trustee, partner, or anyone else	Y	Part D.01,	Y

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N
involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court:		Section 12	
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	Y	Part D.01, Section 13	Y
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Y	Part D.01, Section 14	Y

Applications for wildlife approvals - Kororā

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N
Schedule 7 clause 2(1) - For the purposes of section 43(3)(h), an application for a wildlife approval must include the following information:			
(a) specify the purpose of the proposed activity:	Y	Part E.01, Section 2	Y
(b) identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land):	Y	Part E.01, Section 3	Y
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Y	Part E.01, Section 4	Y
(d) list protected wildlife species known or predicted to be in the area and, where	Y	Part E.01, Section 5	Y

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N
possible, the numbers of wildlife present and numbers likely to be impacted:			
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Y	Part E.01, Section 6	Y
(f) state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Y	Part E.01, Section 7	Y
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Y	Part E.01, Section 8	Y
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):	Y	Part E.01, Section 9	Y
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:	Y	Part E.01, Section 10	Y
(j) list all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site:	Y	Part E.01, Section 11	Y
(k) where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife):	Y	Part E.01, Section 8 and Korora Management Plan	Y
(l) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953:	Y	Part E.01, Section 12	Y
(m) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court:	Y	Part E.01, Section 12	Y

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	Y	Part E.01, Section 13	Y
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Y	Part E.01, Section 14	Y



Competing Interests and Completeness check for project under the Fast Track Approvals Act 2024

State Highway 1 Wellington Improvements

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	(04) 470 8053
Email	fasttrack@heritage.org.nz

Introduction

1. On 14 August 2026, New Zealand Transport Agency Waka Kotahi (NZTA) (the Applicant) lodged a substantive application for State Highway 1 Wellington Improvements (the Project) with the Environmental Protection Agency (EPA).
2. On 17 August 2026 the EPA requested feedback regarding completeness to determine whether the substantive application complies with section 46(2) of the FTA Act.
3. HNZPT has also undertaken a check for competing applications to assist in determining if there are any competing applications or existing resource consents under section 47 of the FTA Act.

Completeness Check

4. HNZPT considers the application to be complete.

Other Matters

5. HNZPT seek clarity as to the relevant skills held by the applicant's person nominated to undertake an activity under the authority (Clause 7). Particularly that they have the relevant skills to undertake buildings recording to a Level 1 or 2 standard or has the support of a buildings archaeologist to undertake these works.

Competing Interests Check

6. HNZPT confirms that there are no current competing archaeological authority applications under the Heritage New Zealand Pouhere Taonga 2014 Act that relate to the same activity and site.

Appendix 3: Request for further information and responses

File ref: FTAA-2607-1272

02 September 2026

Jeremy Talbot
New Zealand Transport Agency Waka Kotahi
C/- Dave Randal
Buddle Findlay
By email: [REDACTED]

Tēnā koe

Request for further information in relation to your application under the Fast-track Approvals Act 2024

You lodged a substantive application, State Highway 1 Wellington Improvements, under the Fast-track Approvals Act 2024 (the Act) on 14 August 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To inform the EPA's assessment of the application for completeness, please provide a response to the following matters:

1. Information that fulfils the requirements of clauses 5(1)(i) and 12(1)(e) of Schedule 5 of the Act, and section 13(4)(l) of the Act, specifically:

- a) identification of the relevant provisions in any Treaty settlements that apply in the area covered by the consent application (cl 5(1)(i), Sch 5)
- b) identification of the relevant provisions in any Treaty settlements that apply in the area to which the substantive application relates (cl 12(1)(e), Sch 5)
- c) a summary of the relevant principles and provisions of the Treaty settlements that apply to the project area (s 13(4)(l))

2. Information that fulfils the requirements of clause 6(1)(b) of Schedule 5 of the Act:

- a) Confirmation on whether the activity includes the use of hazardous installations, and if so, an assessment of any risks to the environment that are likely to arise from such use.

3. Information that fulfils the requirements of clause 6(1)(c)(ii) of Schedule 5 of the Act:

- a) if an activity includes the discharge of any contaminant, a description of any possible alternative methods of discharge, including discharge into any other receiving environment.

4. Information that fulfils the requirements of clause 6(1)(g) of Schedule 5 of the Act:

- a) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved.

Please note that reference to a monitoring plan that is not yet included with the application, without specifying the above information, is not sufficient for the purpose of fulfilling the requirements of this clause.

Feedback from Wellington City Council

- 5.** As part of the mandatory consultation the EPA undertook with the Wellington City Council, the Council provided the following feedback:

“The applicant has omitted potential consent triggers for biodiversity offsetting within the Town Belt and outside the designation. The application assesses these matters against the District Plan generally, indicating that the Infrastructure Chapter is not considered relevant. However, the following may apply: transport of greater than 200 m³ may require consent under EW-R4 and EW-S4; earthworks on a slope greater than 34 degrees (EW-S3), or over 250 square metres in area (EW-S1), may also require consent under EW-R4. Information elsewhere on the biodiversity offset indicates that the relevant area and volume thresholds are likely to be exceeded.” – Row 16 of Table 1 of the Wellington City Council feedback.

The EPA has identified this matter as relevant to the requirements of clause 5(1)(f), and/or clause 12(1)(i) of Schedule 5 of the Act, and/or section 13(4)(t) of the Act. Please confirm whether the consents identified by the Council are required for the project, and if so, if they are sought as part of this application.

- 6.** Wellington City Council's feedback also noted the following:

“Reserves Act 1977 approvals associated with the proposed temporary construction use of reserve land have not been identified in the application. This may also include use of reserve

land for wildlife relocation sites.” – Row 18 of Table 1 of the Wellington City Council feedback.

The EPA has identified this matter as relevant to the requirements of section 13(4)(t) of the Act. Please confirm whether approvals under the Reserves Act 1977 are required for any activities proposed to take place on reserve land.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 30 September 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received on or after 30 September 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA’s consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

If you have any questions, please contact [REDACTED] by email at info@fasttrack.govt.nz.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'Margot Meuleman', written in a cursive style.

Margot Meuleman
Team Leader, Fast-track Applications

3 September 2026

To

Environmental Protection Authority

From

David Randal, Thad Ryan, and Frances Wedde

By Email

Tēnā koe

FTAA-2607-1272 – State Highway 1 Wellington Improvements – request for further information

Introduction

1. As you know, we act for NZ Transport Agency Waka Kotahi (**NZTA**) in respect of its application for approvals under the Fast-track Approvals Act 2024 (**FTAA**) for the State Highway 1 Wellington Improvements project (**Project**).
2. Thank you for your letter dated 2 September 2026 requesting further information to inform the Environmental Protection Authority's (**EPA**) assessment of whether NZTA's application is complete, in terms of section 46 of the FTAA.
3. The EPA has requested further information on six matters, which (broadly) relate to:
 - (a) relevant provisions and principles of Treaty settlements;
 - (b) hazardous installations;
 - (c) alternative methods of discharging contaminants;
 - (d) proposed monitoring;
 - (e) district land-use consent triggers relating to activities associated with biodiversity offsetting; and
 - (f) approvals that would otherwise be sought under the Reserves Act 1977.
4. A couple of these matters can be addressed simply, by NZTA confirming that it does not seek the relevant approvals (so there is no completeness issue). More generally, NZTA is happy to provide the EPA with the further information requested, including by signposting more directly where relevant information is located in the lodged application documents. That information is set out below, addressing the six matters in turn.
5. NZTA also wishes to acknowledge the comments on completeness provided to the EPA by Wellington City Council (**WCC**), Greater Wellington Regional Council (**GWRC**), the Department of Conservation (**DOC**), and Heritage New Zealand Pouhere Taonga (**HNZPT**). While NZTA

respectfully disagrees that any of the matters raised by WCC or GWRC (in particular) render the application incomplete, NZTA records that it:

- (a) has greatly valued the input of WCC, GWRC, DOC, and HNZPT (among numerous other entities) as it has prepared the application; and
- (b) looks forward to continuing to work with the consent authorities and administering agencies through the FTAA process – including to address the comments by WCC and GWRC and provide further clarification as necessary.

Relevant provisions and principles of Treaty settlements

6. The EPA's request is as follows:

1. Information that fulfils the requirements of clauses 5(1)(i) and 12(1)(e) of Schedule 5 of the Act, and section 13(4)(l) of the Act, specifically:

- a) identification of the relevant provisions in any Treaty settlements that apply in the area covered by the consent application (cl 5(1)(i), Sch 5)
- b) identification of the relevant provisions in any Treaty settlements that apply in the area to which the substantive application relates (cl 12(1)(e), Sch 5)
- c) a summary of the relevant principles and provisions of the Treaty settlements that apply to the project area (s 13(4)(l))

7. As an initial point, NZTA acknowledges its Mana Whenua partners in respect of the Project, Taranaki Whānui ki te Ūpoko o Te Ika and Ngāti Toa Rangatira.

8. NZTA's application identifies, at Sections 7.3.1 and 7.3.2 of Part B.01,¹ the settlements entered into by each of those iwi with the Crown in respect of their historical grievances under Te Tiriti o Waitangi, the relevant legislation giving effect to key aspects of those settlements, and the key matters provided for in the settlements as relevant to the Project:

7.3.1 Treaty settlement information

The Treaty settlement legislation for Taranaki Whānui is the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009. This settlement provides for Statutory Acknowledgements which are relevant to the Project area. The Treaty settlement legislation for Ngāti Toa is the Ngāti Toa Rangatira Claims Settlement Act 2014. This settlement provides for Statutory Acknowledgements and poutiaki redress which enables Ngāti Toa to prepare a poutiaki plan and lodge it with relevant councils, following which relevant councils must take the plan into account to the extent it has a bearing on RMA issues of relevance to the coastal marine area. Ngāti Toa have not so far prepared a poutiaki plan.

¹ https://www.fasttrack.govt.nz/data/assets/pdf_file/0025/33379/Part-B.01-Application-for-approvals-relating-to-RMA.pdf; at 7.31 and 7.32.

7.3.2 Statutory Acknowledgements

Statutory Acknowledgements are a formal Crown recognition of the cultural, spiritual, historic, and traditional associations of Mana Whenua with a specific geographic area.

Clause 5(1)(b) Schedule 5 of the FTAA requires a description and map of the project site to confirm whether it is within or adjacent to a statutory area as defined in a relevant Treaty Settlement Act. Figure 4 illustrates the Project area along with the nearby Statutory Acknowledgement areas, as they are mapped in the District Plan and referred to in schedules to the NRP.

The only statutory acknowledgement area which intersects with the Project footprint is the Wellington Harbour location. A Kelburn statutory acknowledgement site is not within or adjoining the Project area.

9. Figure 4 is on page 253 of the same document, Part B.01 of the application, and shows the relevant Statutory Acknowledgement areas.
10. The application also includes cultural impact assessments that have been commissioned by the relevant iwi groups:
 - (a) Technical Report #19 is the cultural impact assessment prepared by Hikoikoi Management Ltd on behalf of the Port Nicholson Block Settlement Trust and the Wellington Tenth's Trust. The report notes that the Port Nicholson Block Settlement Trust was established to manage the Treaty settlement and refers to the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009). The report refers to the statutory acknowledgement contained in that settlement.²
 - (b) Technical Report #20 is the cultural impact assessment prepared by Te Rūnanga o Toa Rangatira Incorporated on behalf of Ngāti Toa Rangatira. The report notes that it was developed with reference to the Ngāti Toa Rangatira Claims Settlement Act 2014³ and refers to the relevance of the statutory acknowledgement contained in that settlement.⁴
11. Given the focus of its mana whenua partners on the statutory acknowledgements contained in their respective Treaty settlements, the application also focused on these provisions. However, for completeness, NZTA provides further analysis of the relevant provisions⁵ and principles⁶ of those settlements as they relate to the Project area below:
 - (a) **Crown acknowledgements and apologies:** As part of its apologies to Taranaki Whānui and Ngāti Toa, the Crown looked forward to a new relationship based on co-operation,

² See pages 1-2; https://www.fasttrack.govt.nz/data/assets/pdf_file/0017/33443/Part-F.19-Technical-Report-19-Cultural-Impact-Assessment-Taranaki-Whanui-Compress.pdf.

³ See page 5; https://www.fasttrack.govt.nz/data/assets/pdf_file/0012/33420/5533ae8dd48ac2cf501329d85ea5f4dc6a8d07ed.pdf.

⁴ See pages 6, 11 and 15.

⁵ Clauses 5(1)(i) and 12(1)(e) of Sch 5 to the FTAA, s13(4)(i) of the FTAA.

⁶ Section 13(4)(i) of the FTAA.

mutual trust and respect for te Tiriti o Waitangi and its principles, with settlement redress mechanisms to be viewed in that context. The partnership that NZTA has entered into with Taranaki Whānui and Ngāti Toa in respect of the Project can be seen in this light as an expression of related principles of mutual trust and good faith.

- (b) **Right of first refusal (RFR):** A significant proportion of the Crown land required for the Project is subject to an RFR in favour of Taranaki Whānui. In addition, some of the land may be subject to a RFR in favour of Ngāti Toa.⁷ While a number of RFR properties are within the Project area, the application does not propose any disposal of Crown land (including land subject to an RFR).
- (c) **Conservation protocol:** There is a protocol governing DOC's interactions with Taranaki Whānui, provided for under Taranaki Whānui's settlement. While the protocol does not specifically address Wildlife Act approvals, NZTA acknowledges its consultation principles. As noted in the application, the wildlife approval applications have been prepared in consultation with both Taranaki Whānui and Ngāti Toa.⁸
- (d) **Te Upoko Taiao:** Te Upoko Taiao is the Natural Resources Plan Committee of GWRC, and is a permanent committee of council under the Ngāti Kahungunu ki Wairarapa Tāmaki nui-a-Rua Claims Settlement Act 2022. The committee includes representatives of Taranaki Whānui and Ngāti Toa, and thereby provides for both iwi to be involved in the preparation of proposed regional plans.⁹ The regional plan is of course a relevant consideration under the FTAA.¹⁰

12. NZTA notes that paragraphs [33] to [51] of the section 18 FTAA report in respect of the Project prepared by the Ministry for Cities, Environment, Regions and Transport also helpfully includes an explanation of these matters.¹¹

Hazardous installations

13. The EPA's request is as follows:

2. Information that fulfils the requirements of clause 6(1)(b) of Schedule 5 of the Act:

- a) *Confirmation on whether the activity includes the use of hazardous installations, and if so, an assessment of any risks to the environment that are likely to arise from such use.*

⁷ Section 183 of the Ngāti Toa Rangatira Claims Settlement Act 2014 defines general RFR land to include land in Wellington City, if the land was acquired by the Crown or the NZTA in particular periods.

⁸ See Part D (application for wildlife approvals relating to lizards), section 13; and Part E (application for wildlife approvals relating to kororā), section 13.

⁹ See the terms of reference for the committee and the memorandum of partnership referred to: [Te-Upoko-Taiao-Natural-Resources-Plan-Committee-terms-of-reference.pdf](#) and [Memorandum-of-Partnership-2013.pdf](#).

¹⁰ FTAA, Schedule 5, cls 17 and 24 set out the criteria and matters for assessment for both resource consent applications and notices of requirement. These provisions refer to RMA provisions which require consideration of the regional plan, and other RMA planning documents, ie s 104(1)(b) and s171(1)(a).

¹¹ [FTAA-2607-1272-SH1-Wellington-Improvements-Section-18-report_Redacted.pdf](#) at [31]-[32].

14. The term "*hazardous installation*" is not defined in the FTAA; other applications have approached the term as synonymous with the storage or use of hazardous substances. It is worth noting, however, that the Project does not include a major hazard facility, as defined in the Health and Safety at Work (Major Hazard Facilities) Regulations 2016, or a high-risk industrial or trade premise as defined in GWRC's Natural Resources Plan.
15. As described in the application in Part F.02 – Technical Report 2 – Constructability Report,¹² hazardous substances may be stored and used at construction yards or depots during construction of the Project, as well as in the tunnel control buildings when the Project is operational. The types and volumes are expected to be typical of those required to construct, operate and maintain a state highway. The Project will not involve the manufacture or disposal of hazardous substances.
16. The storage and use of hazardous substances for the construction, operation and maintenance of State Highway 1 through Wellington are activities already enabled within the existing designation and, in any event, are permitted under the Wellington District Plan (Rule HS-R1).
17. The regional plan generally seeks to avoid discharges of hazardous substances to the environment (e.g. WH.R1 which relates to the point-source discharge of specific contaminants and is a prohibited activity rule). NZTA is not seeking consent to discharge hazardous substances to the environment.
18. Discharges to the environment will be avoided, and risks to sensitive activities and environments will be managed to negligible levels, through standard measures described in Part F.02 – Technical Report 2 – Constructability Report, including:
 - (a) hazardous substance storage and handling procedures;
 - (b) spill kits and spill response procedures;
 - (c) emergency response procedures;
 - (d) routine inspections and audits;
 - (e) designated storage areas;
 - (f) secondary containment, including bunding; and
 - (g) stormwater catchpits and treatment devices.
19. Relevant sections of Part F.02 – Technical Report 2 – Constructability Report include:
 - (a) Section 3.1.7, which relates to proposed enabling works and explains that environmental mitigation and control measures for the Project will include spill kit stations, bunded fuel storage, and bunded chemical storage in site compounds;
 - (b) Section 3.6, which notes that site compounds will include refuelling areas and spill response equipment;

¹² https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/33392/Part-F.02-Technical-Report-2-Constructability-Report.pdf.

- (c) Section 5.4.10, which describes the proposed tunnel systems and tunnel control buildings and notes that construction will include *"systems installation [including] management of hazardous substances such as fire suppression agents and battery storage"*; and
 - (d) Section 5.4.11, which notes that water extracted during tunnel construction is expected to require treatment for contaminants including nitrates and ammonium from blasting (if Ammonium Nitrate Fuel Oil is used), hydrocarbons, diesel, hydraulic oils, lubricants, and chemical compounds potentially released from fire suppression systems.
20. Also relevant to this question is proposed condition RC.17,¹³ which sets out various site and spill management protocols to be implemented (to the extent practicable) for all construction works, which include safe procedures for plant refuelling and maintenance, use of equipment to avoid discharges of fuels or lubricants to sensitive receiving environments, safe storage of fuels, lubricants, and hazardous and/or dangerous materials to avoid such discharges, and provision of emergency spill response equipment and procedures.

Alternative methods of discharging contaminants

21. The EPA's request is as follows:

3. Information that fulfils the requirements of clause 6(1)(c)(ii) of Schedule 5 of the Act:

- a) *if an activity includes the discharge of any contaminant, a description of any possible alternative methods of discharge, including discharge into any other receiving environment.*
22. Section 5.2 of Part B of the application sets out the resource consents sought by NZTA in respect of the Project. These include consents to discharge:
- (a) water within / near wetlands, in constructing specified infrastructure;
 - (b) sediment to a wetland and to water or land associated with earthworks;
 - (c) contaminants to air;
 - (d) groundwater associated with dewatering; and
 - (e) stormwater from the existing and altered State Highway 1 or local road network into water or to land, including using the existing stormwater system.
23. Various possible alternative methods of discharge have been investigated by NZTA and its expert advisors, as explained in Sections 6 and 8 of Part B.01 and the reports in Parts F.12, F.15 and F.17 of the application.

¹³ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/33380/Part-B.02-Appendix-A-Proposed-Conditions.pdf.

24. Section 8.6.2 of Part B.01 of the application provides an overview of various matters relating to section 105 of the Resource Management Act 1991 (**RMA**), which requires regard to be had to any possible alternative methods of discharge, including discharge into any other receiving environment.¹⁴
25. Section 8.6.2 refers in turn to more detailed assessments in Technical Reports #12 (Marine Ecology), #15 (Stormwater Assessment), #17 (Erosion and Sediment Control Assessment), and #18 (Air Quality Assessment). Key aspects of those reports relevant to alternative methods of discharge include the following:
- (a) Technical Report #15 (Stormwater Assessment) describes the Best Practicable Option methodology used to determine the most appropriate methods to discharge stormwater from the Project once operational. The report notes that, due to the urban environment and space constraints of this Project, wetlands are not a feasible option for stormwater treatment along the Project route. As such, the most appropriate treatment forms were assessed to be (in various Project locations) bioretention treatment devices and catchpits with filter inserts, proprietary treatment devices and catchpits with filter inserts, and catchpits with filter inserts only.¹⁵
 - (b) Technical Report #17 (Erosion and Sediment Control Assessment) likewise discusses the significant space constraints and the presence of the existing urban stormwater collection and disposal system through Wellington City, which practically limit the alternative methods for discharging sediment-laden runoff from earthworks during construction. Nonetheless, the report notes the various different approaches adopted throughout the Project area from a 'toolbox' of potential controls or management measures developed for the Project, including the use of containerised sediment treatment systems, which are proposed in various locations to treat runoff prior to discharge into the stormwater system and final discharge points at either Evans Bay or Lambton Harbour.¹⁶
 - (c) Likewise, Technical Report #18 (Air Quality Assessment) discusses the proposed discharges to air during construction and operation of the Project, which cannot practicably be discharged to another receiving environment, and explains that there are a range of methods for dust control proposed to be used during the construction phase to minimise effects on people and the environment depending on the nature of the construction activity.
26. Other aspects of the application that are relevant to this question include the following:
- (a) NZTA seeks approvals to upgrade the capacity of the stormwater network near Ruahine Street (to a 2100mm diameter pipe) and convey increased flows to an upgraded outfall at

¹⁴ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0025/33379/Part-B.01-Application-for-approvals-relating-to-RMA.pdf.

¹⁵ [fasttrack.govt.nz/_data/assets/pdf_file/0015/33414/Part-F.15-Technical-Report-15-Stormwater-Assessment.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/33414/Part-F.15-Technical-Report-15-Stormwater-Assessment.pdf); from paragraph [48].

¹⁶ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0019/33418/Part-F.17-Technical-Report-17-Erosion-and-Sediment-Control-Assessment.pdf; from paragraph [32].

Evans Bay. Technical Report #4 (Design Assessment) summarises the process whereby NZTA considered alternative configurations of that upgraded stormwater system.¹⁷

- (b) Technical Report #4 also summarises how the Project's indicative layout affects identified wetlands near Ruahine Street, and the processes by which NZTA considered alternatives to seek to avoid or reduce those effects.¹⁸

Monitoring

27. The EPA's request is as follows:

4. Information that fulfils the requirements of clause 6(1)(g) of Schedule 5 of the Act:

- a) *if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved.*

28. NZTA proposes that numerous activities associated with the Project will be monitored, as described throughout Parts B (in respect of RMA approvals), C (in respect of archaeological authorities), and D and E (in respect of wildlife approvals) of the application. The nature of the proposed monitoring differs for the various activities, as does the role and qualifications of the person proposed to undertake monitoring, but in most cases monitoring will be carried out by a Suitably Qualified and Experienced Person (SQEP).

29. **Appendix 1** to this letter contains a table summarising the nature of the monitoring proposed to be undertaken, by whom, and the relevant document(s) forming part of the application.

Consents relating to activities associated with biodiversity offsetting

30. The EPA's request is as follows:

5. As part of the mandatory consultation the EPA undertook with the Wellington City Council, the Council provided the following feedback:

"The applicant has omitted potential consent triggers for biodiversity offsetting within the Town Belt and outside the designation. The application assesses these matters against the District Plan generally, indicating that the Infrastructure Chapter is not considered relevant. However, the following may apply: transport of greater than 200 m³ may require consent under EW-R4 and EW-S4; earthworks on a slope greater than 34 degrees (EW-S3), or over 250 square metres in area (EW-S1), may also require consent under EW-R4. Information elsewhere on the biodiversity offset indicates that the relevant area and volume thresholds are likely to be exceeded." – Row 16 of Table 1 of the Wellington City Council feedback.

¹⁷ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0022/33394/Part-F.04-Technical-Report-4-Design-Assessment.pdf; at [110] to [114].

¹⁸ From paragraph [130].

The EPA has identified this matter as relevant to the requirements of clause 5(1)(f), and/or clause 12(1)(i) of Schedule 5 of the Act, and/or section 13(4)(t) of the Act. Please confirm whether the consents identified by the Council are required for the project, and if so, if they are sought as part of this application.

31. As explained in Part B of the application, NZTA seeks all RMA approvals necessary to construct, operate, and maintain the Project. As WCC has identified, this includes all necessary resource consents to carry out specified biodiversity offsetting measures outside the proposed area to be designated, within the Town Belt.
32. Table 17 in Part B of the application identifies that land use consent is sought under the Wellington District Plan to carry out earthworks associated with biodiversity offsetting in the Town Belt, with the identified rule triggers being EW-R7, EW-R12.2 and EW-R14.3. An earthworks consent required by any of those rules is classified as a restricted discretionary activity under the Wellington District Plan.
33. In its comments, WCC has identified potential additional rule triggers, including EW-R4 (the general earthworks rule) and EW-R5 (earthworks on the site of a heritage structure). NZTA is comfortable proceeding on the basis that those rules may also be triggered and has updated Table 17 from Part B of the application, specifying the resource consents sought, which is included as **Appendix 2** to this letter.
34. More broadly, which specific District Plan rules are triggered is a matter that can be worked through with WCC (and the Panel as necessary). That is, WCC's comments simply identify potential additional rule triggers; resource consent for earthworks has already been applied for, and the status is restricted discretionary under the District Plan. The potential additional rules would result in no change in scope or activity status of the application under the District Plan, and no additional or specific assessment of effects is required.

Reserves Act 1977 approvals

35. The EPA's request is as follows:

6. Wellington City Council's feedback also noted the following:

"Reserves Act 1977 approvals associated with the proposed temporary construction use of reserve land have not been identified in the application. This may also include use of reserve land for wildlife relocation sites." – Row 18 of Table 1 of the Wellington City Council feedback.

The EPA has identified this matter as relevant to the requirements of section 13(4)(t) of the Act. Please confirm whether approvals under the Reserves Act 1977 are required for any activities proposed to take place on reserve land.

36. NZTA confirms that it does **not** seek any approvals under the Reserves Act 1977 to undertake any activities on reserves.

37. WCC has correctly identified that constructing the Project will require temporary occupation (as well as some permanent use) of land held under the Reserves Act 1977, namely at Kilbirnie Park and near the Basin Reserve. NZTA intends to follow the processes in the Public Works Act 1981 – rather than the Reserves Act 1977 – to obtain the necessary temporary (and permanent) interests in that reserve land to implement the Project.
38. WCC has queried whether reserve land is proposed to be used for relocations of wildlife associated with the Project. That is not the case:
- (a) The release of lizards will be undertaken on Town Belt land, which is not land held under the Reserves Act 1977. NZTA will require approval from WCC to undertake those activities within the Town Belt, under the Wellington Town Belt Act 2016 and the Wellington Town Belt Management Plan, but it is not possible to apply for those approvals under the FTAA.
 - (b) In terms of the relocation of any kororā at Evans Bay, the nominated relocation land is not held under the Reserves Act 1977 either (and nor is the land where activities associated with the upgrade to the stormwater outfall are proposed to take place).

Conclusion

39. We trust this additional information assists the EPA to conclude that NZTA's application is complete. If you have any further questions, please do not hesitate to contact us.

Nāku noa, nā



David Randal
Partner

DDI • [REDACTED]
[REDACTED]
[REDACTED]

APPENDIX 1 – TABLE OF PROPOSED MONITORING MEASURES

Potential effect	How monitored	Monitoring by whom	Application references
Bus travel times through Hataitai	Construction may affect bus journey times and reliability through Hataitai, so monitoring of bus performance during construction is proposed to be implemented. This includes monitoring changes to delays and journey time reliability on the bus network. Monitoring and mitigation measures will form part of the Construction Traffic and Transport Management Plan (CTTMP) which must include measures to maintain, as far as practicable, safe and efficient traffic flow and connectivity for all road corridor users, including public transport. The CTTMP will be prepared in consultation with WCC and GWRC. In addition, the 'Network Planning Group' (NPG), involving NZTA, WCC and GWRC, will co-ordinate forward work programmes and both short- and long-term operational plans for the Project area. Using traffic monitoring data collected by Metlink, GWRC, NZTA, and WCC, the NPG will support the efficient operation of the network during construction. Its scope will include coordinating	SQEP	Part B.01 at 6.2.2 and 6.2.3.¹⁹ Part B.02 – Appendix A – Proposed Conditions, condition DC.9.²⁰ Part F.05 – Technical Report #5 – Integrated Transport Effects, paragraphs 22, 643, 644, 645, 924 and 925.²¹

¹⁹ https://www.fasttrack.govt.nz/data/assets/pdf_file/0025/33379/Part-B.01-Application-for-approvals-relating-to-RMA.pdf.

²⁰ https://www.fasttrack.govt.nz/data/assets/pdf_file/0017/33380/Part-B.02-Appendix-A-Proposed-Conditions.pdf.

²¹ https://www.fasttrack.govt.nz/data/assets/pdf_file/0023/33395/Part-F.05-Technical-Report-5-Integrated-Transport-Effects.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	the Project's construction works with other events or works on the network, reviewing the timing of intersection traffic signals, identifying initiatives to promote public transport as an alternative, and considering where public transport services may need to be adjusted during construction.		
Noise and vibration	Monitoring will take place as appropriate during the construction phase. With respect to vibration, for dwellings in the High Risk zones, pre-condition building surveys will be undertaken where the proposed construction methodology is predicted to reach or exceed the Category B vibration limits and should be undertaken at a trigger level lower than the Category B limits. Additional vibration monitoring and follow-up building condition surveys will then be undertaken at all buildings that had pre-construction building condition surveys. They will also be undertaken in response to complaints, to ensure construction activities comply with the Category B criteria and that no building damage has occurred.	SQEP	Part B.01 at 6.3.4. Part B.02 – Appendix A – Proposed Conditions, conditions DC.23 – DC.26. Part F.06 – Technical Report #6 – Noise and Vibration Report, paragraphs 147 – 166.²²

²² https://www.fasttrack.govt.nz/data/assets/pdf_file/0024/33396/Part-F.06-Technical-Report-6-Noise-and-Vibration-Effects.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	With respect to noise, the conditions specify the relevant noise standards against which construction noise will be measured and monitored. Monitoring and reporting requirements will be set out in the CNVMP and associated schedules, prepared in accordance with the Noise and Vibration Assessment and Annex E2 of NZS 6803.		
Heritage	A Heritage Standard Management Protocol will be prepared. Standard management protocols to be applied to identified historic heritage items which are to be retained and protected during construction (not relocated, altered or modified). Protocols include pre-construction condition surveys and ongoing monitoring through Project operations to close-out.	SQEP	Part B.01 at 6.5.4 and 6.5.5. Part B.02 – Appendix A – Proposed Conditions, condition DC.15 and DC.16 Part F.08 – Technical Report #8 – Historic Heritage Assessment, 186 – 189. ²³
Archaeological sites	The Project archaeologist will monitor earthworks, especially to identify and record unknown and unrecorded archaeological sites and features.	Project archaeologist	Part B.01 at 6.6.4.

²³ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0012/33402/Part-F.08-Technical-Report-8-Historic-Heritage-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	- Areas of high potential will have an archaeologist onsite during all in-ground excavation or clearing work - Areas of medium potential will have an archaeologist onsite during initial in-ground excavation or clearing work, to examine the likelihood of in-ground archaeological material - Areas of low potential will have an archaeologist on call during initial in-ground excavation or clearing work, in the case of in-ground archaeological material being revealed Depending on what is revealed during the archaeological monitoring, stand down periods may be required at various stages during construction to allow the archaeological work to be carried out, or for consultation to be undertaken with appropriate parties. The Project archaeologist may also undertake any work in conformity with tikanga Māori monitoring protocols agreed to by iwi and the Authority Holder.		Part C.01 Application for Archaeological Authority, condition 5.²⁴ Part F.09.1 – Archaeological Management Plan, sections 2.2, 2.3 and 3.²⁵
Avifauna	An Avifauna Management Plan detailing best practice avifauna management measures will be prepared for the Project.	SQEP	Part B.01 at 6.7.4 and 6.7.5.

²⁴ https://www.fasttrack.govt.nz/data/assets/pdf_file/0025/33388/Part-C.01-Application-for-Archaeological-Authority.pdf

²⁵ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/33445/Part-F.09.1-Archaeological-Management-Plan.pdf

Potential effect	How monitored	Monitoring by whom	Application references
	If it is not possible to avoid clearance during peak breeding season, nest surveys must be undertaken no more than 48 hours prior to vegetation clearance. Nest surveys will include both on the ground visual inspections for any visible nests on branches and / or inspection of cavities and hollows utilised which may be utilised by avifauna for nesting. In the event an active nest is detected, best practice management of the active nest will be undertaken, including the establishment of a minimum buffer of 20 m around the active nest and active nest monitoring to track chick behaviour and fledging.		Part B.02 – Appendix A – Proposed Conditions, condition DC.35. Part F.10 – Technical Report #10 – Terrestrial Ecology Assessment, 156 – 158.²⁶
Lizards	Post-relocation monitoring will be undertaken if defined lizard-count thresholds are met. A Post-Relocation Plan will then be prepared and implemented and sent to WCC and DOC. Monitoring will use Artificial Cover Objects (ACOs) laid out in a 10 x 10 m grid across the relocation site. Lizard monitoring will be undertaken consecutively for five years. An annual report on monitoring outcomes must be produced each year, covering: i. Summary of survey methods.	Project Ecologist and Kaitiaki	Part B.01 at 6.7.4 and 6.7.5. Part D.01 – Application for Wildlife Approval (Lizards), conditions 2 and 5.²⁷ Part F.10.1 – Lizard Management Plan, Section 7.4 and 7.4.1.²⁸

²⁶ https://www.fasttrack.govt.nz/data/assets/pdf_file/0015/33405/Part-F.10-Technical-Report-10-Terrestrial-Ecology-Assessment.pdf

²⁷ https://www.fasttrack.govt.nz/data/assets/pdf_file/0026/33389/Part-D.01-Application-for-Wildlife-Approval-Lizards_Redacted.pdf

²⁸ https://www.fasttrack.govt.nz/data/assets/pdf_file/0016/33406/Part-F.10.1-Lizard-Management-Plan.pdf

Potential effect	How monitored	Monitoring by whom	Application references
	ii. Weather data during the monitoring period. iii. Summary of results. iv. Any recommendations following the survey.		
Construction discharges into marine habitats	An Erosion and Sediment Management Plan (ESMP), site-specific Erosion and Sediment Control Plans (ESCPs) and a Construction Water Treatment Management Plan (WTMP) will be implemented, including construction water quality monitoring prior to discharge. For containerised treatment system discharges, exceeding a trigger of 100/m³ TSS requires a visual inspection to be undertaken at the Evans Bay outlet to assess whether turbid water or deposited sediment attributable to the discharge is present. For non-treatment-system discharges, triggers are incident-related only, such as a device failure resulting in an unintended release, in which case an inspection is initiated. In addition, works in the CMA will be monitored through the Coastal Works Construction Management Plan (CWCMP) which	Construction staff	Part B.01 at 6.9.3 – 6.9.5 and 6.14.4. Part B.02 – Appendix A – Proposed Conditions, conditions RC.10, RC.11, RC.14, RC.18. Part F.12 – Technical Report #12 – Marine Ecology Assessment, paragraphs 199 – 202.²⁹ Draft Erosion and Sediment Management Plan.³⁰

²⁹ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/33409/Part-F.12-Technical-Report-12-Marine-Ecology-Assessment.pdf.

³⁰ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/33418/Part-F.17-Technical-Report-17-Erosion-and-Sediment-Control-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	will include measures to minimise disturbance and discharges of contaminants to the CMA.		
Kororā	Kororā surveys (pre-works baseline, pre-construction) and post-relocation monitoring will be undertaken. During construction, daily check of the works extent will be conducted by a nominated person(s) trained by the SQEP. The daily check will include surveying the zone of influence and will focus on identifying any signs of kororā presence. If an active burrow is found within the zone of influence, the SQEP will implement fortnightly monitoring until it is confirmed that the burrow is no longer active. Monitoring will consist of a visual inspection of the burrow and its contents by an SQEP, and data will be collected as prescribed. If through the fortnightly monitoring it is determined that the level of disturbance is greater than predicted and unacceptable the SQEP will advise on further methods to reduce the level of disturbance.	SQEP	Part B.01 at 6.9.3 – 6.9.5. Part B.02 – Appendix A – Proposed Conditions, condition RC.22 Part E.01 – Application for Wildlife Approval (Kororā - Little Penguins), conditions 2 and 5.³¹ Part F.12.1 – Kororā Management Plan, 3.3.2, 3.3.3, 3.4.1, 3.4.2.1 and 3.4.8.3.³²

³¹ https://www.fasttrack.govt.nz/data/assets/pdf_file/0018/33390/857f2a79f95c48a44d0ebf9e79ce610a864fd1cd.pdf.

³² https://www.fasttrack.govt.nz/data/assets/pdf_file/0012/33411/d7d407cdd8dbb0466a38d960148aa13a27c71ec1.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	If any kororā are relocated, annual monitoring will occur at the relocation site. Habitat compensation will be monitored and maintained for a minimum of five years following establishment in accordance with condition RC.22.		
Town Belt compensation	Town Belt wetland compensation established under condition RC.23, and vegetation and habitat offset established under DC.37 will be monitored and maintained, including undertaking weed control, pest management and replacement planting as necessary, for a minimum of five years following revegetation/restoration planting or until 80% canopy cover is achieved (whichever is achieved first).	SQEP	Part B.02 – Appendix A – Proposed Conditions, conditions DC.37 and RC.23. Part F.10 – Technical Report 10 – Terrestrial Ecology Assessment.³³ Part F.11 – Technical Report #11 – Freshwater and Wetland Ecology Assessment.³⁴
Ground subsidence associated with	Proactive monitoring of the subsidence of the ground overlying the proposed tunnels, and development of an action plan to mitigate the effects of the construction of the tunnel is proposed.	SQEP	Part B.01 at 6.10.3.

³³ https://www.fasttrack.govt.nz/data/assets/pdf_file/0015/33405/Part-F.10-Technical-Report-10-Terrestrial-Ecology-Assessment.pdf.

³⁴ https://www.fasttrack.govt.nz/data/assets/pdf_file/0018/33408/Part-F.11-Technical-Report-11-Freshwater-and-Wetland-Ecology-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
tunnel construction	This includes identification of the areas that could be potentially affected by subsidence during detailed design (currently identified as the "Yellow zone" in the resource consent conditions), pre-construction condition surveys of the buildings in the identified areas, monitoring of the subsidence of the ground during and for a period after construction, and setting of alarm levels to trigger actions required to mitigate the subsidence. A Groundwater and Settlement Monitoring Contingency Plan (GSMCP) will be developed to refine the area affected by subsidence and angular distortion along with the location of subsidence and groundwater monitoring points. This would include alarm levels and response measures, using a trigger-action-response plan (TARP) regime.		Part B.02 – Appendix A – Proposed Conditions, condition RC.26. Part F.13 - Technical Report #13 – Geotechnical, Natural Hazards, and Resilience Assessment, paragraphs 36, 44 and 198.³⁵
Ground settlement and groundwater drawdown	Groundwater monitoring will be required prior to and during the construction phase, and for 1 year after the completion of construction. A Groundwater and Settlement Monitoring Contingency Plan (GSMCP) will be prepared to support the monitoring of land	SQEP	Part B.01 at 6.11.3. Part B.02 – Appendix A – Proposed Conditions, condition RC.26. Part F.14 – Technical Report #14 – Groundwater Assessment,

³⁵ https://www.fasttrack.govt.nz/data/assets/pdf_file/0013/33412/Part-F.13-Technical-Report-13-Geotechnical,-Natural-Hazards,-and-Resilience-Effects.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	settlement effects caused by the temporary and permanent groundwater level drawdown and mechanical settlement. Groundwater monitoring is separated into pre-construction, during construction, and post construction. Pre-construction monitoring will provide baseline data against which effects resulting from the construction works can be assessed. Condition surveys and visual inspections of selected nearby buildings to define existing condition of the buildings. During construction, monitoring is carried out to compare settlement against the set Alert and Alarm levels and enable the implementation of countermeasures in advance of potential adverse impacts occurring. Ground settlement and building markers will be installed in all directions around the tunnel and trench excavations. During construction, ongoing groundwater level monitoring at the Ruahine Street/Wellington Road stormwater renewal, Mt Victoria Tunnel, Basin Reserve and the Terrace Tunnel to confirm if groundwater level drawdowns remain within the expected range.		paragraphs 137 and 138, and Annexure D (GSMCP requirements).³⁶

³⁶ https://www.fasttrack.govt.nz/data/assets/pdf_file/0014/33413/Part-F.14-Technical-Report-14-Groundwater-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	Post-construction measurements will be completed, if required, for 1 year after completion of dewatering or until the position markers are found to have stabilised and approval is given in writing by GWRC.		
Stormwater quality (operational)	Monitoring of the condition of stormwater treatment devices during operation will be implemented to maintain performance of treatment devices, as part of a Stormwater Maintenance Plan (SMP). Prior to discharge to the stormwater network, groundwater ingress water from the Terrace Tunnel, Sussex Street Trench and Mt Victoria Tunnel, and deluge water collected from the Terrace Tunnel and Mt Victoria Tunnel following tunnel washdown, accidental spill, or firefighting activities will be monitored for compliance with the water quality standards set in condition RC.31.	SQEP	Part B.01 at 6.11.3. Part B.02 – Appendix A – Proposed Conditions, condition RC.30, RC.31. Part F.14 – Technical Report #14 – Groundwater Assessment, paragraphs 134, 137 and 142.³⁷
Rainfall monitoring	During works, contractors will regularly monitor the weather forecast for significant rain events. A significant rain event is defined as ≥ 25 mm in 24 hours or ≥ 15 mm in 1 hour.	SQEP and contractors	Part B.01 at 6.14.4.

³⁷ https://www.fasttrack.govt.nz/data/assets/pdf_file/0014/33413/Part-F.14-Technical-Report-14-Groundwater-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	Within 12 hours following a significant rainfall event, the erosion and sediment controls will be inspected.		Part B.02 – Appendix A – Proposed Conditions, conditions RC.10 and RC.11. Draft Erosion and Sediment Management Plan, section 6.1. ³⁸
Erosion and sediment control inspections	Erosion and sediment control inspections will be undertaken to ensure they are functioning as intended and meet the requirements at all times during works and until the site is stabilised. Inspections will occur weekly and within 12 hours following significant rain events, subject to health and safety requirements.	SQEP	Part B.01 at 6.14.4. Part B.02 – Appendix A – Proposed Conditions, conditions RC.10 and RC.11. Draft Erosion and Sediment Management Plan, section 6.2. ³⁹
Stormwater discharge monitoring (construction)	Stormwater discharge monitoring will be undertaken at: • The outlets of any water treatment plants; and, • In the event of an unexpected or non-compliant discharges across the boundary of the site. The location and frequency of regular sampling of treated water discharged from devices will be specified in the SSES CPs.	SQEP	Part B.01 at 6.14.4. Part B.02 – Appendix A – Proposed Conditions, conditions RC.10, RC.11 and RC.15. Part F.17 – Technical Report #17 – Erosion and Sediment

³⁸ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/33418/Part-F.17-Technical-Report-17-Erosion-and-Sediment-Control-Assessment.pdf.

³⁹ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/33418/Part-F.17-Technical-Report-17-Erosion-and-Sediment-Control-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	Monitoring will be a combination of continuous monitoring where appropriate and grab samples. Proposed discharge limits from sediment retention/treatment devices to stormwater network inlets are a maximum TSS of 100 g/m³ and pH within 6 to 9. While the limit is set for TSS, continuous monitoring at treatment plants will be undertaken for turbidity. In the event of unexpected or non-compliant discharges, initial contingency response includes visual inspection and in-field monitoring within 24 hours, using hand-held monitors for pH and turbidity and checking for colour/clarity change, scums/foams, or sediment deposition. If effects are indicated, further grab samples are sent for laboratory analysis and a Marine Ecologist is engaged.		Control Assessment, paragraphs 91 – 98.⁴⁰ Draft Erosion and Sediment Management Plan, section 6.3.⁴¹
Air discharge effects	Monitoring of the proposed construction mitigation measures is required to ensure that they are being effectively implemented.	A team dedicated to monitor air quality effects	Part B.0.1 at 6.15.4. Part B.02 – Appendix A – Proposed Conditions, conditions RC.8, RC.9.

⁴⁰ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/33418/Part-F_17-Technical-Report-17-Erosion-and-Sediment-Control-Assessment.pdf.

⁴¹ https://www.fasttrack.govt.nz/data/assets/pdf_file/0019/33418/Part-F_17-Technical-Report-17-Erosion-and-Sediment-Control-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	This includes real-time PM10 monitoring at the following three locations due to the proximity of the works to a large number of sensitive receptors: i. Adjacent to the northern portal of the Terrace Tunnel ii. Adjacent to the western portal of the Mount Victoria Tunnel iii. Adjacent to R19 (church) on Moxham Ave Visual dust monitoring will also be undertaken consistent with the dust monitoring programme as set out in the Air Quality Assessment. The frequency of the visual monitoring is defined but it should also occur in the event that wind speeds are greater than 10 m/s, discharges of dust cross the site boundary or when a complaint is received.		Part F.18 – Technical Report #18 – Air Quality Assessment, paragraphs 244–247 and Table 23.⁴²
Cultural effects	A cultural monitoring plan must be prepared, with the purpose of setting out the cultural monitoring methods and activities to be undertaken. The cultural monitoring plan must outline: (i) requirements and protocols for cultural inductions for contractors and subcontractors;	SQEP and MWSG	Part B.02 – Appendix A – Proposed Conditions, conditions DC.7 and RC.7.

⁴² https://www.fasttrack.govt.nz/data/assets/pdf_file/0020/33419/Part-F.18-Technical-Report-18-Air-Quality-Assessment.pdf.

Potential effect	How monitored	Monitoring by whom	Application references
	(ii) the activities, sites and areas where cultural monitoring is required during particular construction works and what that monitoring will comprise; and (iii) the number of personnel who will undertake cultural monitoring and the geographic areas in which they will do so.		

APPENDIX 2 – UPDATED TABLE 17 – RESOURCE CONSENTS REQUIRED FOR THE CONSTRUCTION OF THE PROJECT

Resource consents	Activity
<i>Resource consents required under the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F) – regional land use consent, water permit and discharge permit in accordance with sections 9(1), 13(1), 14(1) and 15(1) of the RMA</i>	
Construction of specified infrastructure (Regulation 45(1)) – <i>discretionary activity</i>	Vegetation clearance within, or within a 10m setback from, a natural wetland for the purpose of constructing specified infrastructure
Construction of specified infrastructure (Regulation 45(2)) – <i>discretionary activity</i>	Earthworks or land disturbance within, or within a 10m setback from, a natural wetland for the purpose of constructing specified infrastructure
Construction of specified infrastructure (Regulation 45(3)) – <i>discretionary activity</i>	Earthworks or land disturbance outside a 10m, but within a 100m setback
Construction of specified infrastructure (Regulation 45(4)) – <i>discretionary activity</i>	Taking, use, damming, diversion, or discharge of water within, or within a 100m setback from, a natural wetland for the purpose of constructing specified infrastructure
<i>Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS) – district land use consent in accordance with section 9(1) of the RMA</i>	
Disturbing soil (Regulation 11) – <i>discretionary activity</i>	Disturbance of potentially contaminated soil that is not classified as a permitted activity, controlled activity or restricted discretionary activity ⁴³

⁴³ A preliminary site investigation (PSI) has been completed identifying two potentially contaminated sites within the project area. The proposed earthworks in these locations are expected to be above the permitted volume of 25 m³ per 500 m², soil taken away may exceed 500m³ per year and the duration of the activity will exceed two months. In addition, a detailed site investigation (DSI) may not be available at the time of consenting, so it is assumed that the activity will not meet the requirements of Regulation 9 or 10, and so consent is required as a discretionary activity under Regulation 11.

Resource consents required under the NRP and PC1	
Activities in wetlands - land use consent, water permit and discharge permit in accordance with sections 9(2), 13(1), 14(1) and 15(1) of the RMA	
NRP <i>Rule R118: Activities in natural wetlands – non-complying activity</i>	Undertaking construction activities in a natural wetland including diverting water, land disturbance, reclamation and discharge of sediment, which is a non-complying activity under rule R118
Discharge to air - discharge permit to air in accordance with section 15(2A) of the RMA	
NRP and PC1 <i>Rule R42: All other discharges – discretionary activity</i>	The discharge of contaminants into air associated with the handling of bulk solid materials including from the activities of quarrying, mining, cleanfilling, blasting, extraction, crushing, screening, processing, stockpiling, handling, conveying, sorting, and storage that is not permitted, controlled, discretionary, non-complying or prohibited is a discretionary activity
Earthworks and vegetation clearance - land use consent and discharge permit in accordance with sections 9(2) and 15(1) of the RMA	
NRP <i>Rule R107: Earthworks and vegetation clearance – discretionary activity</i>	The use of land, and the associated discharge of sediment into water or onto or into land where it may enter water from earthworks, and vegetation clearance on erosion prone land that is not permitted by Rules R101, R102, R104 and R105, and not controlled by Rule R103, or not restricted discretionary by Rule R106 requires consent as a discretionary activity, pursuant to rule R107
PC1 <i>Rule WH.R25: Earthworks – non-complying activity</i>	Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24(b) relating to winter earthworks is a non-complying activity, pursuant to rule WH.R24
Dewatering - water and discharge permits in accordance with sections 14(1) and 15(1) of the RMA	
NRP <i>Rule R160: Dewatering – restricted discretionary activity</i>	The take of groundwater and the associated diversion and discharge of that water for the purpose of construction phase dewatering including groundwater diversion during tunnel and trench construction is not permitted by Rule R159 as conditions related to dewatering duration and Hazardous Activities and Industries List (HAIL) land within the project area are unable to be met, so dewatering is a restricted discretionary activity under rule R160

Maintenance, repair, additions and alterations to existing structures – coastal permit in accordance with section 12(1) of the RMA	
NRP <i>Rule R181: New structures, additions or alterations to structures outside Schedule C, Schedule F4, Schedule F5 or Schedule J sites – discretionary activity</i>	Alteration to a stormwater outfall structure within the coastal marine area is a discretionary activity under rule R181
Resource consents required under the Resource Management Act – district land use consents, in accordance with section 9(3) of the RMA	
Land use consent for earthworks and vegetation removal within the Town Belt as part of the vegetation offsetting proposal⁴⁴	
District Plan <i>Rule WTBZ-R8</i> <i>Any other activity not otherwise provided for as a permitted activity, restricted discretionary activity or discretionary activity</i>	Vegetation removal is not listed in the Wellington Town Belt Zone chapter. While conservation activities are permitted under WTBZ-R3, vegetation removal is not expressly included in this definition. Accordingly, consent is sought on a precautionary basis for vegetation removal associated with the proposed terrestrial offsetting as a discretionary activity under rule WTBZ-R8
District Plan <i>Rule NFL-R3</i> <i>Any activity within special amenity landscapes not otherwise listed as permitted, restricted discretionary, or non-complying</i>	Vegetation removal is not otherwise listed as permitted, restricted discretionary or non-complying within the special amenity landscapes. Consent is therefore sought as a restricted discretionary activity under rule NFL-R3
District Plan <i>Rule EW-R4</i> <i>General earthworks</i>	Given the scale and location of the terrestrial offsetting proposal (approximately 6 hectares), earthworks may involve transport of more than 200 m³ of cut material, occur on slopes greater than 34 degrees and disturb an area greater than 250m³, consent is therefore sought as a restricted discretionary activity under rule EW-R4.

⁴⁴ This work is proposed outside the altered NZTA-1 designation extent and is not permitted under the District Plan.

District Plan <i>Rule EW-R5</i> <i>Earthworks on the site of scheduled heritage buildings and structures, and within heritage areas</i>	Given the scale of the terrestrial offsetting proposal (approximately 6 hectares), it is expected that the 10m² and 10m³ permitted limits for earthworks on the site of a heritage structure (Hataitai Tunnel) in rule EW-R5.1 may be exceeded, therefore consent sought as a restricted discretionary activity under rule EW-R5.2
District Plan <i>Rule EW-R7</i> <i>Earthworks within Sites and Areas of Significance Category A and Category B</i>	The site is located within a Category A Area of Significance therefore consent is required for any earthworks associated with the proposed terrestrial offsetting activity as a restricted discretionary activity under rule EW-R7
District Plan <i>Rule EW-R12.2</i> <i>Earthworks within special amenity landscapes</i>	Given the scale of the terrestrial offsetting proposal (approximately 6 hectares), it is expected that the 200m² permitted limit for earthworks within special amenity landscapes in rule EW-R12.1 may be exceeded, therefore consent is required as a restricted discretionary activity under rule EW-R12.2
District Plan <i>Rule EW-R14.3</i> <i>Earthworks within the ridgeline and hilltops overlay or within the ridgetop area of the Upper Stebbings and Glenside West Development Area</i>	Given the scale of the terrestrial offsetting proposal (approximately 6 hectares), it is expected that the 200m² permitted limit and 500m² restricted discretionary limit for earthworks within the ridgeline and hilltops overlay may be exceeded, therefore consent is required as a discretionary activity under rule EW-R12.3