

**BEFORE AN EXPERT PANEL
SOUTHERN SEAWALL RENEWAL PROJECT**

FTAA-2510-1118

Under the **FAST-TRACK APPROVALS ACT 2024**

In the matter of an application by Wellington International Airport Limited for approvals for the Southern Seawall Renewal Project

By **WELLINGTON INTERNATIONAL AIRPORT LIMITED**
Applicant

JOINT WITNESS STATEMENT

PLANNING: END-EFFECTS EROSION

9 April 2026

INTRODUCTION

1. This joint witness statement relates to the updated conditions in relation to planning, and more specifically end-effects erosion.
2. It has been prepared in response to Minute 3 of the Expert Consenting Panel, which recorded:

[5] End-effect erosion – there appears to be a difference of opinion as between GWRC and the Applicant on the monitoring required on end-effects erosion. We direct that the Applicant and GWRC confer and provide us with an agreed set of conditions on this matter. If agreement cannot be reached, we direct that we are clearly informed of where the differences lie. We have included a general direction on the conditions below.

3. As directed, the updated conditions were agreed between:
 - (a) **Ms Kirsty O'Sullivan** and **Ms Ellen Robotham** for the Applicant (Wellington International Airport Limited (**WIAL**)). Ms O'Sullivan and Ms Robotham prepared:
 - (i) the WIAL Southern Seawall Renewal Fast Track Approvals Act – Substantive Application, dated 23 October 2025;
 - (ii) the proposed Resource Consent Conditions, including the most recent set provided on 17 March 2026; and
 - (iii) a statement of evidence in response to comments made under section 53 of the Fast-track Approvals Act 2024 (**FTAA**), including in relation to Greater Wellington Regional Council's (**GWRC**) comments on end-effects erosion.
 - (b) **Mr Andrew Banks** for GWRC. Mr Banks prepared GWRC's section 53 FTAA comments and suggested amendments to the Applicant's resource consent matrix and conditions. As Mr Banks has not provided evidence with respect to this fast track application, his qualifications and experience are set out in Appendix A of this Joint Witness Statement.

CODE OF CONDUCT

4. This joint witness statement is prepared in accordance with the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. Unless stated otherwise, the issues addressed in this joint witness statement are within our area of expertise and we have not omitted to consider material facts known to us that might alter or detract from the opinions we express.

CONDITIONS ON END-EFFECT EROSION

5. The Panel directed WIAL and GWRC to provide an agreed set of conditions regarding the monitoring required on end-effects erosion.
6. We conferred over email and agreed on the following amendments:
- (a) amending *C.01 Engineering Plans for Consent*¹ to incorporate the design shown in Figure 1 of Jennifer Hart and Amy Sheppard's Statement of Evidence dated 17 March;²
 - (b) adding a new condition CA.25 to replace the existing CA.24(a) obligation to remediate material erosion, scour, or instability of land in the CMA attributable to the structure;
 - (c) amending conditions CA.27 (visual inspection) and CA.29 (record of inspection) to include the adjacent beach in the requirement to undertake visual inspections and take photographic records, in addition to the structure; and
 - (d) correcting the error in the cross-reference in Condition CA.28.
7. These updated conditions are set out below:

Maintenance and repair - General	
CA.24	The structures authorised to be placed in CMA by this consent must be maintained in good and sound condition, and any repairs and reinstatements that are necessary must be made, subject to obtaining any necessary resource consents or other approvals, if required, so that:

¹ https://www.fastrack.govt.nz/_data/assets/pdf_file/0018/14436/C.01-Engineering-Plans-for-Consent.pdf

² https://www.fastrack.govt.nz/_data/assets/pdf_file/0011/22511/Appendix-4-Statement-of-evidence-of-Jennifer-Hart-and-Amy-Sheppard_Redacted.pdf

	<p>(a) Any material erosion, scour, or instability of land in the CMA that is attributable to the structures and works carried out as part of this consent is remedied by the Consent Holder;</p> <p>(a) The structural integrity of any structure remains sound in the opinion of a Chartered Professional Engineer; and</p> <p>(b) No materials are dumped or stored on any structure;</p> <p>(c) Public access to the CMA is not further impeded by the structure(s);</p> <p>(d) The structure(s) do not pose a hazard to navigation or public safety.</p>
CA.25	There must be no material erosion, scour, or instability of land in the CMA that is attributable to the structures or works authorised by this consent.
CA.25 CA.26	<p>Maintenance and repair activities may include, but not be limited to:</p> <p>(a) Replacement and/or repair of the western crest gabions and reno mattresses;</p> <p>(b) Reprofiling and/or replacement of damaged, displaced, or eroded Cubipod units or rock;</p> <p>(c) Use of shore-based and marine equipment.</p>
CA.26 CA.27	<p>Visual inspection of the structure and the adjacent beach must occur:</p> <p>(a) Annually for the first two years and five-yearly thereafter; and</p> <p>(b) Within 1 month of any significant storm event (being a 10% AEP event or greater) or significant earthquake event.</p>
CA.27 CA.28	<p>Visual inspections required by Condition CA. 1827 must be undertaken by a SQEP (coastal/maritime engineer) and include:</p> <p>(a) A baseline inspection at the completion of construction;</p> <p>(b) Use of a checklist to assess each element of the structure for defects; and</p> <p>(c) Reference photographs from set locations.</p>
CA.28 CA.29	<p>A record of each inspection and any maintenance works undertaken must be maintained, including:</p> <p>(a) Date of inspection and/or maintenance works;</p> <p>(b) Condition of the structure and surrounding area;</p> <p>(c) Description of maintenance works required and/or undertaken;</p> <p>(d) Photographic evidence of the condition of the structure and the adjacent beach; and</p>

	(e) <u>A comparison of the inspection observations against the historic baseline data, including but not limited to aerial photographs, topographical surveys, and observations from any previous inspections.</u>
CA.29 <u>CA.30</u>	The inspection and maintenance record must be provided to the Manager GWRC upon request.

8. Following this exchange, we have agreed that if the Panel accepts these amendments, that that the additional conditions CA.30 to CA.32 suggested by GWRC in its section 53 comments are not necessary.
9. WIAL will reflect these updates in the set of conditions that they provide in response to the Panel's Minute 3.

Date: 9 April 2026



Ms Kirsty O'Sullivan



Ms Ellen Robotham



Mr Andrew Banks