

**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

**MEMORANDUM OF COUNSEL FOR WELLINGTON INTERNATIONAL
AIRPORT LIMITED SEEKING MINOR CORRECTIONS TO THE EXPERT
PANEL'S DECISION**

20 May 2026

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MAY IT PLEASE THE PANEL:

1. This memorandum of counsel is filed on behalf of Wellington International Airport Limited (**WIAL**) in relation to the Expert Panel's final decision under section 87 of the Fast-track Approvals Act 2024 (**FTAA**), issued on 15 May 2026 (**Decision**). WIAL is grateful to the Panel for its timely release of the Decision.
2. Section 89 of the FTAA provides for the Panel to make minor corrections to the Decision, as follows:

89 Minor corrections

(1) A panel may, within 20 working days after issuing a decision document under section 88(1), issue an amendment to the document to correct minor omissions, errors, or other defects in it.

3. WIAL proposes minor corrections to the main Decision document, and to the Reserves Act approvals documents. All the corrections proposed by WIAL are within the scope of section 89 of the FTAA.
4. For completeness, no minor corrections are proposed to the resource consent conditions (or consent matrix), wildlife approvals, or archaeological authority.

Minor corrections to the Decision document

5. WIAL has reviewed the main Decision document, and subsequently proposes a number of minor corrections, as set out in the table included as **Appendix A** to this memorandum.
6. Most of these proposed minor corrections were previously identified by WIAL, in the table included with WIAL's comments on the draft decision; that table may have been missed by the Panel.¹ A small number of additional minor corrections have been identified and added to the table.

Minor corrections to the Reserves Act approvals document

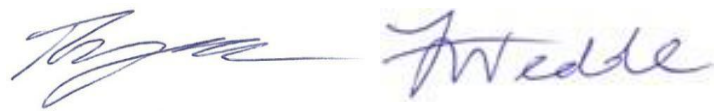
7. As noted in WIAL's comments on the draft decision, the numbering and formatting of the Reserves Act approval documents included in the draft

¹ Memorandum of counsel for WIAL providing applicant's response to draft decision and conditions, 5 May 2026, paras 14-15: [1.05.2026-WIAL-Memorandum-of-counsel-for-WIAL-Applicant-comments-on-draft-decision-and-conditions_Redacted.pdf](#) (Note the covering page for this memorandum is dated 1 May 2026, which is an error. The memorandum was signed and filed on 5 May 2026.)

decision had corrupted. This issue remains in the documents included with the Decision. As a result, the numbering and cross-referencing in the Reserves Act approval documents in the Decision is incorrect.

8. WIAL understands that the panel did not intend to make any changes to the proposed Reserves Act approval documents filed by WIAL and WCC and therefore respectfully requests that the PDF versions refiled by WIAL on 5 May 2026, when commenting on the draft decision, are included in the Decision.¹

Dated this 20th day of May 2026



Dave Randal / Thad Ryan / Frances Wedde
Counsel for Wellington International Airport Limited

¹ The redacted version of the correct Reserves Act documents are at this link: [1.05.2026-WIAL-Reserves-Act-approvals-31-March-2026-REDACTED.pdf](#)

Appendix A – WIAL's proposed minor corrections to the Decision

Paragraph	Suggested amendment	Reasoning for amendment
11	<i>Additionally, the George Bolt Street Construction Yard is located on the eastern western side of Wellington International Airport.</i>	Typo correction
17(c)	Update 'MGD Yard' to 'MGC Yard'	Typo correction
26	<i>The National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health requires consent for soil disturbance associated with the Southern Seawall and Moa Point Yard as a controlled activity</i>	Suggest being more specific as to where / why consent is required.
31(a)	<i>A detailed site investigation for contamination in respect of the MGC Yard and GPS coordinates – on 13 November 2025;</i>	Suggest being more specific, noting a DSI for the Southern Seawall and Moa Point Yard was provided with the original Application.
34	Last sentence: ... <i>the Panel met on-line or in person on the following occasions</i>	We understand the Panel met in person on 5 February and therefore suggest this amendment.
35(l)	Add semicolon at end of line	Typo correction
59(c)	<i>As noted by the GWRC Applicant we found that “rigid numerical occupancy targets are not an appropriate measure of success for kororā colony establishment”...</i>	Typo correction

131 – 105	Following para 131, the numbering reverts back to 105: correct so that the numbering continues on <i>NB from this point on, para references in this table are to the current para numbers in the Decision</i>	Paragraph numbering correction
111	Correct '20-tonne Cubipod units' to '15.5-tonne Cubipod units'	Typo correction
117	Correct 'GOBT' to 'GOTB'	Typo correction
138	Correct 'MDC Yard' to 'MGC Yard'	Typo correction
146	Add full stop at the end of this paragraph	Typo correction
147	Delete extra full stop at end of first sentence	Typo correction
184	Correct 'assesses' to 'assess'	Typo correction
194	Delete duplicate of 'the relevant' in the first sentence.	Typo correction
195	Last line: ... <i>that there are likely to be up to 50 sites.</i>	Typo correction
200	Remove quote marks and extra full stop at end of indented quote.	Typo correction
201	Remove extra full stop at end of indented quote.	Typo correction

209	<i>... Reserves Act approval is therefore needed for in relation to the eastern western end of the penguin underpass</i>	Typo correction
254	<i>With respect to Schedule G3(5)(b)(ii)</i>	Typo correction
258	<i>...with residual effects adequately offset / compensated for ...</i>	This addition would reflect that the two kororā colonies have been described in the Residual Effects Assessment Report (B.12 in the Application) as compensation rather than offsetting.
281	Add full stop at end of paragraph.	Typo correction
313	<i>... The Panel anticipates that this recommendation can be addressed via the Community Liaison Group conditions as proposed by the Applicant.</i>	To confirm that the recommendation is addressed by WIAL's proposed conditions (and no further amendments are required).
334	<i>The natural character effects for both the current and modified environments is considered to be low and very low accordingly.</i>	Typo correction
344	<i>The Applicant proposed made two minor updates to construction traffic management conditions are proposed...</i>	Typo correction
367	Delete 'To' at the start of second sentence	Typo correction

405	Suggest moving this paragraph out of the NPS-FM section, to the NES Freshwater section (to be a new paragraph 65), and amending as follows: <i>The Project is "specified infrastructure" and therefore exempt from the NPS, subject to assessment under Regulation 45 of the NES-F.</i>	As per paragraph 397, the Project is consistent with (rather than exempt from) the NPS-FM. The paragraph relates more to the Project's status under the NES-F.
409	<i>The Panel has had regard to the updated version (December 2025) of the NPS-IB, which came into effect prior to the Panel's decision but after preparation of some of the supporting technical assessments.</i>	The original (2023) NPS-IB came into effect before the Application and technical assessments were completed; the 2025 amendments were made after the Application was lodged
471	<u><i>Difference of interpretation – Applicant and GWRC /WCC</i></u> <i>In its section 53 comments, WCC stated that it "agrees with the applicant's position that the effects on human health from disturbance of contaminated land are likely to be low and supports the proposed conditions on this matter."</i> GWRC, also acting for WCC in relation to contaminated land matters, expressed a different preliminary view in its section 53 comments, particularly in relation to perceived gaps in sampling coverage at the MGC Yard and exceedances of indirect ecological guideline values (including PFAs) with the seawall footprint.	GWRC and WCC both engaged the same consultant advisor (Ms Rhodes of PDP) to consider contaminated land matters, but separately and in respect of their own matters of interest: human health and the NES-CS for WCC, and ecological health and the Wellington NRP for GWRC. In its section 53 comments, WCC confirmed it was comfortable with the position reached on contaminated land in respect of human health and the NES-CS. The issues raised, and flagged in this paragraph of the draft decision, were specific to GWRC's section 53 comments (and ecological health and the NRP).

472	Based on that preliminary view, GWRC /WCC considered that ...	As above – the concerns raised were specific to GWRC.
474	The Panel notes that the Applicant and GWRC /WCC have resolved these matters through expert conferencing...	As above – the concerns raised were specific to GWRC.
532	Add full stop at end of this paragraph.	Typo correction.
568	The Panel notes that controlled activity pathways under the NES-CS are engaged, and the agreement reached between the Applicant and GWRC /WCC that the standards in NRP Rule 82 have been met.	As per previous contaminated land comments: the agreement re the NRP standards is specific to the Applicant and GWRC.
596	Delete \ at the end of this paragraph.	Typo correction.
599	Add a new paragraph to the list: <i>Port Nicholson Block Settlement Trust supports the Project in its role as post settlement governance entity for Taranaki Whānui, subject to the full and ongoing implementation of the agreed conditions and management plans.</i>	This addition would ensure that the position of both Ngāti Toa Rangatira and Taranaki Whānui is recorded in the Panel's summary of findings in the Treaty settlements section of the decision. The suggested new paragraph reflects the PNBST letter included in Part F of the Application: 5095142abc60d9e78f0b776f9148ed1d09d9154e.pdf

622 and 623	Remove references to WCC in both paragraphs.	As discussed above, only GWRC raised contaminated land issues in its section 53 comments.
631	<i>i. For a resource consent clause 18 of Schedule 5 apply applies.</i>	Typo correction