

**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

CONTAMINATED LAND

9 April 2026

INTRODUCTION

1. This joint witness statement relates to expert witness conferencing in relation to contaminated land.
2. It has been prepared in response to Minute 3 of the Expert Consenting Panel, which recorded:

*[3] Contamination – there is a difference of opinion between the Applicant’s expert – Ms Shepherd and those experts representing the two councils (Wellington City and Greater Wellington Regional – **WCC** and **GWRC**) who is Ms Rhodes for both Councils. We direct that the two expert’s confer and provide us with a joint witness statement confirming their final positions by **10 April 2026**. We do not consider that such conferencing warrants an independent facilitator unless this is requested.*

3. As directed, the participants in the expert conferencing were:
 - (a) **Sarah Shepherd** for the Applicant (WIAL). Ms Shepherd prepared a statement of evidence in response to comments made under section 53 of the Fast-track Approvals Act 2024 (**FTAA**), including comments by Ms Rhodes in relation to contaminated land. Ms Sheperd was the Suitably Qualified and Experience Practitioner responsible for the:
 - (i) Beca – Detailed Site Investigation (Contamination) Sea Defences Renewal, dated 5 September 2025 and included in Part B of the application for the Project,¹ and an updated version of that document provided to the EPA on 18 February 2026² (**Southern Seawall DSI**);
 - (ii) Beca – Preliminary Site Investigation (Contamination) Sea Defences Structure Renewal, dated 5 September 2025 and included in Part B of the application for the Project;³
 - (iii) Beca – Detailed Site Investigation (Contamination) WIAL Sea Defences Renewal Project – Miramar Golf Course, dated 9 October 2025,⁴ and an updated version of that document dated

¹ [B.07-Beca-Contaminated-Land-DSI-Soutehrn-Seawall-updated-13.11.25_Redacted.pdf](#)

² https://www.fasttrack.govt.nz/_data/assets/pdf_file/0013/21163/B.07-Beca-Contaminated-Land-DSI-Soutehrn-Seawall-updated-13.11.25_Redacted.pdf

³ [Preliminary Site Investigation \(Contamination\) - Sea Defence Structures Renewal](#)

⁴ [DSI-Contamination-Miramar-Golf-Course_091025R.pdf](#)

27 January 2026 and provided to the EPA in advance of the Panel Overview Conference (**Miramar Golf Course DSI**);⁵

(iv) the Beca – Contaminated Land Management Plan (**CLMP**) WIAL Sea Defences Renewal, dated 3 October 2025 and included in Part G of the application for the Project;⁶

(b) **Nerena Rhodes** for Greater Wellington Regional Council (**GWRC**) and Wellington City Council (**WCC**). Ms Rhodes prepared Appendix 6 to GWRC's section 53 FTAA comments,⁷ and Appendix 6 to WCC's section 53 FTAA comments,⁸ addressing contaminated land matters.⁹

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.

PURPOSE AND SCOPE OF CONFERENCING

5. The purpose of conferencing was to identify, discuss and highlight points of agreement and disagreement between the two contaminated land experts.

6. The discussion focussed in particular on the matters addressed in Ms Rhodes' Appendix 6 to the GWRC section 53 FTAA comments and in Ms Shepherd's evidence, namely:

(a) Miramar Golf Course:

- (i) the adequacy of sample coverage informing the Miramar Golf Course DSI; and
- (ii) whether consent conditions should be imposed requiring further sampling and / or an update to the Airport-wide CLMP to address

⁵ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0016/20059/Draft-Detailed-Site-Investigation-Miramar-Golf-Course-January-2026_Redacted.pdf

⁶ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/14474/G.03-Beca-Contaminated-Land-Management-Plan.pdf

⁷ [FTA260318-Appendix-6-GW-Technical-Comments-Contaminated-Land.pdf](#)

⁸ [Letter](#)

⁹ [FTA260318-Appendix-6-GW-Technical-Comments-Contaminated-Land.pdf](#)

environmental risk and the results of any further sampling at the MGC Yard;

(b) Southern Seawall / Eastern Bank Remediation area:

- (i) whether the Southern Seawall DSI appropriately addresses environmental risk;
- (ii) whether the CLMP should be updated specifically to address environmental risk; and
- (iii) whether the CLMP should be submitted to GWRC for certification (if it is not updated through this FTAA process).

(c) The application of Rules R82 and R94 of the Wellington Natural Resources Plan to the Project, in light of the above matters.

7. Ms Shepherd and Ms Rhodes reviewed each other's reports and evidence prior to conferencing.
8. The expert conferencing was held via video conference on 2 April 2026 between the experts. Conferencing was not facilitated, and only the two contaminated land experts attended.
9. The following records the agreed issues, areas of disagreement and the reasons, along with any reservations.

MIRAMAR GOLF COURSE

10. Ms Rhodes had not previously seen comments prepared by Beca (dated 27 January 2026) in response to her review of the Miramar Golf Course DSI. These were provided directly to Ms Rhodes by Ms Shepherd on 31 March 2026 prior to conferencing.
11. During conferencing, the 27 January 2026 comments and Ms Shepherd's evidence with respect to sample coverage were stepped through providing the rational applied in targeting the managed turf areas (greens, tee boxes and fairways) and having some 'other' coverage, including sampling in low-lying areas where irrigated wastewater is more likely to pond, supporting the approach taken.
12. Ms Rhodes agreed following the discussion of the sampling rational that the matter of sample coverage was addressed and no further action was required on that matter.

SOUTHERN SEAWALL / EASTERN BANK REMEDIATION

13. To determine if the CLMP needs to be updated to address environmental risk and be submitted to GWRC for certification as a condition of consent, the application of NRP Rules R82 and R94 need to be addressed first.

APPLICATION OF NRP RULES R82 AND R94

14. It was agreed that Ms Rhodes would discuss with GRWC and come back to Ms Shepherd.
15. Following this conversation, Ms Rhodes agreed that the standards in R82 have been met for both the Southern Seawall and Miramar Golf Course and accordingly the CLMP does not need to be updated to address environmental risk.

Date: 9 April 2026



Sarah Shepherd



Nerena Rhodes