

Response ID ANON-URZ4-5FRV-R

Submitted to Fast-track approval applications  
Submitted on 2024-05-02 16:28:30

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:  
Wellington International Airport Limited ("WIAL")

2 Contact person

Contact person name:  
John Howarth

3 What is your job title

Job title:  
Project Manager Southern Seawall Renewal Project

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
  
PO Box 14175, Wellington

7 Is your address for service different from your postal address?

Yes  
  
Organisation:  
Mitchell Daysh Limited  
  
Contact person:  
Kirsty O'Sullivan

Phone number:  
s 9(2)(a)

Email address:  
s 9(2)(a)

Job title:  
Partner

Please enter your service address:  
  
PO Box 489, Dunedin 9054

Section 1: Project location

Site address or location  
  
Add the address or describe the location:

The address of Wellington International Airport ("Wellington Airport" or the "Airport") is 28 Stewart Duff Drive, Rongotai, Wellington. The proposed project involves the reconstruction and upgrade of the Airport's Southern Seawall ("the seawall"), located at the southern end of the Airport's runway on Lyall Bay (see figure attached).

Ancillary activities to support the seawall reconstruction and upgrade will likely occur at the following locations:

- A new or upgraded supply wharf in Evans Bay;
- Construction Yard 1: 18 George Bolt Street, Rongotai, Wellington;
- Construction Yard 2: The southern portion of Miramar Golf Course, located at 28 Stewart Duff Drive, Rongotai, Wellington.

File upload:

WIAL - Southern Seawall Renewal - Project location.PNG was uploaded

Upload file here:

No file uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

WIAL - Southern Seawall Renewal - Records of Title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Southern Seawall: Wellington City Council (Record of Title WN45A/75)

Miramar Golf Club site, 28 Stewart Duff Drive, Rongotai: Wellington International Airport Limited (Record of Title 973798)

18 George Bolt Street: Wellington International Airport Limited (Record of Title 1096648)

Supply wharf: To be confirmed (Within coastal marine area of Evans Bay – preferred location yet to be determined)

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The Southern Seawall is partially located in the Coastal Marine Area. The landward portion of the Southern Seawall is located on land owned by Wellington City Council ("WCC"). Wellington International Airport Limited ("WIAL") has an agreement with WCC to maintain the seawalls between Lyall Bay and Moa Point.

The potential construction yards are located on land wholly owned by WIAL.

Several potential supply wharf locations are under consideration and WIAL is in discussion with the land / asset owners. Once a preferred wharf site is determined, WIAL expects to undertake detailed discussions with the relevant land and asset owners regarding wharf arrangements.

Following the completion of transportation modelling, WIAL intends to liaise with WCC (and the NZ Transport Agency Waka Kotahi ("NZTA")) regarding access and use of local roads between the supply wharf and the Stewart Duff Drive construction yard.

## Section 2: Project details

What is the project name?

Please write your answer here:

Wellington International Airport Southern Seawall Renewal

What is the project summary?

Please write your answer here:

The Southern Seawall protects the Airport's runway and flight operations from the forces of the Southern Ocean. The Southern Seawall is now nearing the end of its design life and requires complete reconstruction and upgrade to ensure ongoing protection of the Airport – a nationally and regionally significant piece of infrastructure.

The Southern Seawall also protects a range of other WCC assets, including Wellington City's main wastewater connection to the Moa Point Wastewater Treatment Plant and Moa Point Road itself.

What are the project details?

Please write your answer here:

The project is to reconstruct and upgrade Wellington Airport's Southern Seawall. The seawall has reached the end of its 50-year design life and engineering advice has confirmed that it requires reconstruction in the immediate future.

The Southern Seawall Renewal will help safeguard the long-term operation of Wellington Airport against natural hazards, and increase the Airport's resilience to climate change, given that sea levels are rising, and better defend against the increased frequency and severity of storm driven wave action.

The proposed project will 'overlay' a new seawall made of rock and concrete armour units over the existing Southern Seawall and extend the seawall seawards. Overall, the Southern Seawall Renewal is expected to increase the width of the seawall seaward by approximately 15m to 25m and the total finished length of the formal seawall will increase (at the crest) by approximately 100m.

Due to the nature of the project, a number of ancillary activities will be required to support the seawall reconstruction and upgrade. The two most notable of these are the provision of a supply wharf in Evans Bay, and development of construction yards, a laydown area and, potentially, a temporary manufacturing plant.

#### Evans Bay supply wharf

Due to a national shortage of suitable rock for sea defences, the proposal will require rock material to be transported by barge from either the top of the South Island and across the Cook Strait, or down the west coast of the North Island from Taranaki, to Wellington Airport. In order to accommodate the vessel assigned to deliver this construction material, it is proposed that a supply wharf be located in Evans Bay. Options are being investigated and could include the potential strengthening or partial rebuilding of Miramar Wharf (a historically significant wharf) or the construction of a suitable new wharf facility.

#### Construction yards, laydown area and manufacturing plant

Due to the volume of armour material (rock and concrete armour units) required for this project, WIAL intends to source and store rock and potentially batch process concrete and cast armour units on site in advance of the seawall works commencing. Two potential laydown and manufacturing areas have therefore been identified:

- The southern part of Miramar Golf Course; and
- A site on George Bolt Street

While these sites will likely be required at different stages of the project, the southern part of the existing Miramar Golf Course will likely provide the primary yard area and may be used to establish a concrete batching facility and a casting area.

Both of these sites are owned by WIAL.

#### Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The project stages are as follows:

**Design and planning** – This stage involves the selection of a preferred solution (completed), marine and quarry investigations (completed), modelling, ground investigations and preliminary and detailed design development. This stage is currently underway and expected to be completed mid-2025.

**Consenting** – This stage involves the development of technical assessments based on the preliminary design, stakeholder consultation and the preparation of the resource consent application. This stage runs concurrently with the detailed design stage and is currently underway and well advanced. Under the current process, the approvals are required to be in place by 2026, with consultation with stakeholders planned to be ongoing until the completion of the project.

**Construction** – The construction stage will be undertaken in four parts as follows:

- Contractor engagement and involvement in establishing final construction methodology;
- Site enabling works, including the Evans Bay supply wharf, the establishment of the construction yards, laydown area and manufacturing plant; and
- Preparatory works, including transporting and stockpiling rock to the site and onsite casting and storage of armouring units; and
- The main works, comprising the physical reconstruction of the seawall itself.

In total, the construction stage is expected to take approximately 6-7 years.

Given the nature of the works, there will be some overlap between the stages, with design and planning and consenting occurring concurrently. Construction timing and the length of time to complete construction will be dependent on a range of factors including availability of contractors, supply and delivery of rock, and conditions placed on the project (for example, if construction work cannot occur during night time hours to which is necessary to avoid potential conflict with airport operations).

#### What are the details of the regime under which approval is being sought?

Please write your answer here:

## Resource Management Act 1991

Resource consents are required from WCC and Greater Wellington Regional Council ('GWRC') for following Land Use Consents, Water Permits, Discharge Permits and Coastal Permits.

### Wellington City Council

- Land use consents for construction activities including earthworks, land disturbance, vegetation clearance, construction noise, signage, lighting and traffic.
- Land use consent for construction, use and maintenance of physical structures.

### Greater Wellington Regional Council

- Coastal permits for reclamation, construction and occupation of structures, disturbance of the foreshore and seabed, diversion of water and (potentially) the alteration / replacement of a heritage structure in the coastal marine area during construction and noise within the coastal marine area.
- A coastal permit consent for the alteration of an existing seawall.
- Discharge permits for discharges of dust to air for construction activities including earthworks and concrete batching.
- Discharge permits for the discharge of water and contaminants during construction.
- Land use consent for earthworks associated with establishment of construction yards.

### Heritage New Zealand Pouhere Taonga Act 2014

The project will require an archaeological authority for earthworks and development of the Miramar Golf Course and George Bolt Street site.

### Wildlife Act 1953

A permit to catch, and/or hold wildlife under the Wildlife Act 1953 will be required for disturbance of terrestrial and marine wildlife. This relates to terrestrial wildlife such as lizards which may be potentially found on the Miramar Golf Course, and marine wildlife such as little penguins / kororā which are likely to inhabit the periphery of the existing seawall.

### Reserves Act 1977

Parts of the Southern Seawall are classified as esplanade reserve, therefore, relevant approvals will be required under the Reserves Act 1977.

Note: this list is not exhaustive and further design refinements may result in further consent requirements.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Wellington City Council and Greater Wellington Regional Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No resource consent applications have been made for this proposal.

Is approval required for the project by someone other than the applicant?

Yes

Please explain your answer here:

Permission is required from:

- WCC which owns the land on which the seawall is located, as well as the road reserve adjacent to the seawall and the possible supply wharf sites that WIAL may seek to temporarily use and occupy; and
- Relevant land / asset owner for supply wharf site.

While discussions have commenced with both parties, no formal agreements have been entered into regarding the specific details of this project.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

A high-level timeline of the project is as follows:

June – July 2024: Iwi, key stakeholder and community consultation period.

July 2024: Construction tenders awarded.

September 2024: Technical assessments finalised.

October 2024: Applications lodged under Resource Management Act 1991 or Fast-track approval process. Anticipated timeframe for consent under a

standard Resource Management Act 1991 process approximately 18 months (May 2026). Anticipated timeframe for consent under a Fast-track approval process, approximately six months (May 2025).

April 2025: Detailed design completed.

Mid 2025: Site works are currently scheduled to commence in May 2026. However, if Fast-track approval is granted, it is anticipated that construction could begin in mid 2025.

Late 2031 / early 2032: Construction is expected to take approximately 6-7 years. Therefore, if Fast-track approval is granted, the project would be completed in late 2031 / early 2032.

Regarding funding, consultation with the airlines, covering the period April 2024 to March 2029, has been completed. The final agreement included provision for the Southern Seawall Renewal.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The following iwi groups have been identified as having an interest in the project area:

- Taranaki Whanui – Port Nicholson Block Settlement Trust (mana whenua of the Port Nicholson area, the trust was established to receive and manage the Treaty Settlement package for Taranaki Whanui ki Te Upoko o Te Ika);
- Wellington Tenth Trust (Te Ātiawa, Ngāti Tama, Taranaki, and Ngāti Ruanui tupuna);
- Ngāti Toa Rangitira (exercise kaitiakitanga over Te Moana o Raukawa (Cook Strait), inclusive of Lyall Bay (Hue te Para), and applicant under the Marine and Coastal Area (Takutai Moana) Act 2011 ("MACAA"))
- Te Ātiawa ki Te Upoko o Te Ika a Maui Trust (applicant under MACAA).
- Muaupoko Tribal Authority Incorporated (applicant under MACAA).

The following parties are also likely to be affected by the project:

- WCC, which owns the land on which the Southern Seawall is located and potential supply wharf sites, and is the road controlling authority for the road reserve adjacent to potential wharf sites;
- Potentially Centre Port Wellington, which owns the Miramar Wharf;
- Nearby residents;
- The Wellington Boardriders Club;
- Lyall Bay Surf Lifesaving Club; and
- The NZ Transport Agency Waka Kotahi.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Greater Wellington Regional Council

No specific consultation, however Greater Wellington Regional Council have been provided information via submissions/hearings via Plan Change 1 to the Regional Policy Statement.

Wellington City Council

Consultation with Wellington City Council has commenced by WIAL providing an introduction to the Southern Seawall Project to Wellington City Councillors and Officers in early 2021.

Consultation has also commenced and continues with key Transport and Infrastructure team members.

CentrePort

Discussions have also commenced between WIAL and CentrePort Executives.

Port Nicholson Block Settlement Trust

Information sent, no reply received as yet.

Ngāti Toa

WIAL has provided an overview of the Southern Seawall Project to Ngāti Toa representatives and has hosted a visit to the site. Further information has also been provided, however no further correspondence / feedback has been received as yet.

Local residents and users

WIAL circulated letters to residents of Lyall Bay and Strathmore Park, posted information on their website and hosted two public meetings in September 2023 specifically regarding the project. An online survey of preferred options was also carried out which showed clear support for the overlay option that is currently being pursued for the Southern Seawall Renewal.

WIAL continues to engage closely with the Wellington Boardriders Club who represent local surfers and host them for regular update meetings. They are providing feedback and information on surf conditions to the surf modellers engaged for the project.

Upload file here:

Southern Seawall Overview.pdf was uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

No processes under the Public Works Act 1981 have been undertaken, or are proposed to be undertaken, in order to facilitate the reconstruction and upgrade of the Southern Seawall and associated activities.

#### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

Both the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009 and the Ngāti Toa Rangitira Claims Settlement Act 2014 apply to the project area.

The Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009 identifies the Coastal Marine Area Coastal Statutory Acknowledgement, and the Wellington Harbour Statutory Acknowledgement which are relevant to this project.

The Ngāti Toa Rangitira Claims Settlement Act 2014 recognises the Te Whanganui-ā-Tara (Wellington Harbour) Coastal Statutory Acknowledgement and the Te Moana o Raukawa (Cook Strait) Coastal Statutory Acknowledgement.

The Applicant has commenced engagement with Taranaki Whānui ki Te Upoko o Te Ika and Ngāti Toa Rangitira, as described in Section 3 above.

The decision-making process for the application will need to reflect Te Tiriti o Waitangi, which guarantees rangatiratanga and requires the Crown to uphold the principles of partnership, good faith and protection.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

Yes

If yes, what are they?:

Moa Point is identified as a Category B (Wāhi Taonga) area of Significance to Taranaki Whānui ki Te Upoko o Te Ika in the proposed Wellington City District Plan 2024. While this feature is mapped in the proposed Wellington City District Plan as being slightly north of the project footprint, WIAL understands that the mapped location of this feature is indicative only. The values ascribed to this area will be further refined through WIAL's engagement with Taranaki Whānui and Ngāti Toa.

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

Yes

If yes, what are they?:

Te Ātiawa ki Te Upoko o Te Ika a Maui Trust, Te Ātiawa ki te Upoko o te Ika a Māui Pōtiki Trust, and Ngāti Toa Rangitira, have sought Customary Marine Title and Protected Customary Rights under the MACAA.

Muaupoko Tribal Authority Incorporated have sought Protected Customary Rights in the coastal marine area around the Airport. They have also sought a

customary marine title of this area under the MACAA, however their application is currently subject to appeal.

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

Yes

If yes, please explain:

WIAL has commenced engagement with Taranaki Whānui and Ngāti Toa Rangatira regarding this proposal and will consider all potential effects on Taranaki Whānui and Ngāti Toa Rangatira as part of these discussions.

As part of this engagement, WIAL will seek specific comment from Te Ātiawa (whom are part of Taranaki Whānui) regarding the project.

Upload your assessment if necessary:

No file uploaded

## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

WIAL has engaged a wide range of expert and independent consultants to inform the potential resource consent applications for the project. As mentioned earlier, the construction work is estimated to continue for a duration of around 6-7 years.

The following technical assessments are currently being prepared or are in the process of being commissioned:

- Cultural values;
- Noise;
- Transportation;
- Landscape and visual amenity;
- Marine ecology;
- Avifauna;
- Cultural values;
- Historic and archaeological values;
- Heritage assessment – Miramar Wharf;
- Surf and coastal values;
- Civil design;
- Economic effects; and
- Planning (Mitchell Daysh).

The anticipated effects of the project are generally as follows.

### Noise effects

Tonkin + Taylor has modelled the likely noise effects of construction phase of the project. The Noise Assessment found that between the hours of 7:30 am – 6 pm, construction noise will generally meet NZS 6803:1999 construction noise limits. However, the noise generated by night-time works at some sites is likely to exceed the limits. Construction vibration generated by the project is expected to be negligible.

WIAL will develop a project specific Construction Noise Management Plan (“CNMP”) to assist with the management of the effects of construction noise. The CNMP will set out noise mitigation measures that may be required such as limiting night-time noise at some sites, the use of noise barriers, and the use of acoustically treated buildings at some sites where practicable. If necessary, WIAL will also consider providing acoustic treatment (i.e. mechanical ventilation) if further modelling demonstrates a need to do so.

WIAL will also engage with the community about the expected noise effects of the project, both prior to lodgment and during the construction works.

### Transportation effects

As would be expected by a project of this nature and scale, there will be adverse effects on transportation networks. However, the project has been designed to reduce traffic movements where possible. For example, the proposal to barge material to an Evans Bay Wharf will result in significantly lower traffic movements than if rock material was transported to the site by road from CentrePort or source sites further afield.

WIAL, with the assistance of Stantec, will shortly commence consultation with NZTA and WCC on how best to approach, model, and address adverse transportation effects.

It is likely that transportation effects will be managed using traffic management approaches, intersection upgrades, scheduling heavy vehicle movements outside peak hours and implementing procedures around driving behaviours (such as braking, use of reversing beepers and ensuring vehicles are not left idling while waiting or queuing).

### Natural character, landscape and visual amenity

Boffa Miskell has assessed the effects of the project on natural character, landscape and visual amenity values. As would be expected by a project of this nature and scale, adverse landscape and visual effects will inevitably occur during construction, including disruption to landscape character values and imposition on available views.

Natural character, landscape and visual amenity effects will be managed through the development of site landscape plans and / or seascape management plans where appropriate. Other measures to manage landscape and visual amenity effects include selection of type and colour of construction materials (for example, the seawall concrete armour will be tinted dark grey at a reflective value of 36% or less so as to blend in with the coastal environment), screening requirements (for parking, loading and storage areas), and landscaping and site rehabilitation requirements where appropriate with the nature and scale of the works.

Overall, with the use of mitigation techniques, adverse effects on natural character within the context of the Southern Seawall and enabling areas are considered to be low (minor) during construction, reducing to very low adverse (less than minor) on completion of the works. Both the seawall and supply wharf have the potential to provide increased habitat opportunities for flora and fauna within the marine area which is a positive effect in terms of its contribution to natural character values within the coastal marine area.

#### Marine ecology

Bioresearches has been engaged to undertake an assessment of the effects of the project on marine ecology. While the initial field surveys are complete, the associated assessment of effects has yet to be prepared.

Studies undertaken in 2015 to assess the effects of a proposed runway extension on marine ecology provide an indication of the types of effects that can be expected from the proposed seawall renewal (albeit on a significantly reduced scaled), including:

- Physical disturbance and loss of habitat;
- Changes in water quality through seabed disturbance and potential introduction of contaminants;
- Increases in suspended sediment and turbidity of the water column;
- Release of contaminants such as heavy metals during disturbance of the seabed; and
- Noise from construction activities.

These effects were considered to be no more than minor, and able to be appropriately managed for the runway extension. Therefore, it is expected that these effects will also be able to be appropriately managed for the similar, yet significantly smaller Southern Seawall Renewal Project, via (for example) the development of an Erosion and Sediment Control Plan and an Environmental Mitigation and Management Plan ("EMMP").

#### Avifauna values

An assessment of the effects of the project on avifauna is currently underway, however is not yet complete.

As above, studies undertaken for the proposed runway extension provide useful guidance on the types of effects on avifauna that can be expected. These effects primarily relate to construction activities (including noise) temporarily disturbing seabirds such as little penguins / kororā and shags. If little penguins / kororā are within the vicinity of the construction area, they could be disturbed and /or displaced. It is anticipated however, that the number of penguins affected is likely to be very small and will be manageable, through potential establishment of alternative nesting habitats and other measures set out the EMMP.

#### Cultural values

WIAL is currently engaging with the Taranaki Whānui and Ngāti Toa Rangitira regarding this project and others in the area. As part of these discussions, WIAL will seek guidance around their preferred engagement approach and will invite them to prepare a Cultural Impacts Assessment.

Without predetermining the outcome of the Cultural Values Assessment (if Taranaki Whānui or Ngāti Toa Rangitira elect to do so), WIAL can draw from the earlier assessments undertaken as part of the runway extension project to help develop a high level understanding the key cultural values for this area.

As described above, Moa Point is recognised as a Category B (Wāhi Taonga) area of Significance to Taranaki Whānui ki Te Upoko o Te Ika in the proposed Wellington City District Plan 2024. In addition, an old Pa site (Rangitatau) overlooks the Southern Seawall site from a headland (Hue te Taka) just to the east. Hue te Taka provides a launching point for spear fishermen who hunt butterfish and other species from the shore. Another Pa site (Maupuia) is located close to Miramar Wharf. Wellington's southern coast has strong traditional associations with both shell fishing and fin fishing for Māori, both in the past and today.

WIAL recognises the significant cultural values in the area, particularly as they relate to coastal values and customary and commercial fishing. In this respect, measures to manage the ecological effects of the project, and effects on water quality are also instrumental in managing any potential effects on cultural values.

While the area has been heavily modified, and the discovery of new sites of significant to Māori is considered unlikely, WIAL will ensure an accidental discovery protocol is in place throughout the life of the project.

#### Historic and archaeological values

Emily Howitt Archaeology has undertaken an assessment of the archaeological values associated with the Southern Seawall area. and the proposed

construction yard sites.

The assessment concluded that there is no archaeological potential in the Southern Seawall area, but there is some archaeological potential on the George Bolt Street site, and the Miramar Golf Course site. This relates to potential disturbance of archaeological deposits relating to Māori activity and settlement, and, in the case of the Miramar Golf Course, features or artefacts relating to the use of the site as a golf course prior to 1900.

To manage these effects, an Archaeological Management Plan will be developed for the project, and an archaeologist will be onsite when earthworks occur in areas where the discovery of archaeological deposits is likely. An appropriate accidental discovery protocol will be followed at all times during the project.

As recommended, by Emily Howitt Archaeology, WIAL will seek Archaeological Authorities for earthworks at the George Bolt Street site, and the southern part of the Miramar Golf Course.

#### Heritage assessment – Miramar Wharf (potential supply wharf site)

Miramar Wharf is in poor condition and is currently closed to the public for health and safety reasons. WIAL has engaged Archifact to undertake a heritage assessment of the wharf. This assessment, combined with structural surveys of the existing condition of the heritage wharf and investigation of other potential wharf sites, will help WIAL to identify a preferred wharf location.

If the Miramar Wharf location was selected, the heritage assessment and structural surveys would also help to confirm whether to retain and upgrade the existing wharf or whether its complete replacement was necessary. If selected, it would be anticipated that a remaining section of Miramar Wharf would be restored or reconstructed at the end of the project for public access, for example for fishing and public enjoyment.

#### Surf and coastal values

WIAL has engaged technical experts DHI to undertake wave modelling and to assess the impact of the project on waves and surf values. While this work is still underway, it is anticipated that the project will have a negligible effect on wave climate and surf breaks within Lyall Bay and potentially a minor improvement on wave conditions immediately in front of the Southern Seawall, due to less wave reflection.

As part of this workstream, DHI and WIAL are actively engaging with the Wellington Boardriders Club and drawing from their knowledge of the wave environment (including through photographs and surf records) to help verify the results of these assessments.

#### Coastal processes

Beca has undertaken a preliminary assessment of the effects of the project on coastal processes. This assessment has considered the effects of the works both within Evans Bay and Lyall Bay on water levels, waves (drawing from DHI's assessment), currents, sediments and sediment transport, and coastal hazards. The report will not be finalised until DHI's wave modelling is complete.

The project is anticipated to have no to negligible effect on tide levels, with the works primarily overlaying or replacing structures already present within the coastal marine area. For this same reason, a negligible to minor effect on currents and sediment and sediment transport is anticipated.

During construction, disturbance of the foreshore and seabed is anticipated as a result of excavation works, the driving of piles, the removal and placement of rock and armour units and the use of plant and equipment within the coastal marine area. The development and implementation of a Construction Management Plan will ensure that effective mitigation measures are put in place for managing such effects, with regular monitoring ensuring any residual effects are within an acceptable limit.

The purpose of the Southern Seawall Renewal is to improve the seawall's resilience to coastal hazards and inundation, and accordingly, it will not give rise to an increase in natural hazard risk. Rather, the proposed new seawall will be more resilient and provide greater protection from coastal hazards.

Upload file:

No file uploaded

## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The New Zealand Coastal Policy Statement ("NZCPS") is relevant to this project. The purpose of the NZCPS is to state objectives and policies in order to achieve the overarching purpose of the RMA in relation to the coastal environment.

The provisions of the NZCPS that are most relevant to this project relate to:

- Ecosystem values and coastal water quality;
- Tangata whenua values and interests;
- Public access and recreational opportunities in the coastal environment;
- Coastal hazard risks; and
- Enabling social, economic and cultural wellbeing.

Overall, it is considered that the proposal can be undertaken in a manner that is not inconsistent with the sustainable management outcomes sought for the coastal environment in the NZCPS, for the following reasons:

- As described in Section 5 above, it is anticipated that the project can be undertaken in a way that appropriately avoids (where required) or manages adverse effects on ecosystem values, coastal water quality or natural character and natural features / landscapes;
- The Applicant is committed to ongoing and genuine engagement with relevant iwi regarding this project. Significant cultural values in the area relate strongly to coastal values and customary and commercial fishing. In this respect, measures to manage the ecological effects of the project, and effects on water quality will be instrumental in managing any potential effects on cultural values;
- The Southern Seawall has a functional need to be located in an area subject to coastal hazard risks given that its purpose is to protect the Airport and other infrastructure (such as WCC's road and water infrastructure) from such hazards. The design has considered the potential impact of sea level rise and extreme weather events; and
- The project is critical for the safe and efficient ongoing operation of Wellington Airport. As described in Section 7 below, the Airport is an important contributor to the Wellington regional economy. Furthermore, the Airport plays an important role fostering social and cultural connections between Wellington, the rest of New Zealand, and globally; and provides lifeline infrastructure in the event of an emergency.

File upload:

No file uploaded

## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Access to the Fast-track process will enable the project to be processed in a more timely and cost-efficient way than under conventional processes. The key reason for this is that the project requires approvals under the Resource Management Act 1991, Heritage New Zealand Pouhere Taonga Act 2014, and Wildlife Act 1953 which are separate approval processes. The omnibus process proposed under the Fast-track Approvals Bill means that all relevant approvals under those pieces of legislation can be processed together.

Furthermore, the current statutory planning environment in Wellington is complex, and in a state of change. The proposed and operative District Plans are at different stages of the decision-making process and may be subject to lengthy appeals. Plan Change 1 to the Regional Policy Statement is yet to have decisions issued, but they are expected shortly and could alter the regulatory position for this project. In addition, Plan Change 1 to the Natural Resources Plan for the Wellington Region proposes to introduce a range of significant constraints on development in the Wellington area. This is in the early phase of the plan development process, with hearings yet to be heard for this plan change.

In addition, the processing time frames proposed under the Fast-track Approvals Bill are more expedient than those that apply under the Resource Management Act 1991. The net result will be that the project, and its benefits, will be achieved much earlier.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The project has been in development since 2018, so is well advanced.

It is anticipated that completing the technical work that is currently underway and preparing the Resource Management Act 1991 application will take approximately 6 months to complete. Under a standard Resource Management Act 1991 process, the application is likely to be filed in October 2024. If accepted for the Fast-track process, a similar lodgment date is anticipated.

During this time, more urgent or advanced projects can be processed via the Fast-track process, whilst also ensuring that there is a pipeline of projects ready to go. The application, whilst strategically significant for managing coastal hazard risks and protecting significant infrastructure assets, does not raise novel effects, nor are the components of the project individually complex as they are largely building on an already disturbed footprint (i.e. the existing seawall and wharf structures). On that basis the application is likely to be relatively straightforward to process and is unlikely to absorb significant processing resources.

Has the project been identified as a priority project in a:

Other

Please explain your answer here:

Other. Wellington Airport's WLG 2040 masterplan identifies seawall upgrades as a priority and necessary to improve resilience to the effects of climate change.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

Wellington International Airport is identified as regionally significant infrastructure in the Proposed Wellington City District Plan 2024 ("pWDP"), the Greater Wellington Regional Policy Statement ("RPS"), Plan Change 1 to the RPS ("pRPS"), the Greater Wellington Natural Resources Plan ("NRP") and Plan Change 1 to the NRP ("pNRP"). The airport is also a lifeline utility with important duties to fulfill under the Civil Defence Emergency Management Act 2002. As the seawall safeguards and is critical to the ongoing operation of the Airport, it too is considered to be regionally significant. Without the renewal project, the long-term operation of the Airport would be at risk and potentially compromised.

The Airport is also considered "nationally significant infrastructure" in the National Policy Statement for Urban Development ("NPS-UD").

The seawall also protects WCC's main wastewater network pipes that connect significant parts of Wellington City to the Moa Point Wastewater Treatment Plant. Like the Airport, both the wastewater network and the pipes are classified as regionally significant infrastructure in the pWDP, RPS, pRPS and NRP. The seawall, therefore, continues to also protect the ongoing integrity of these features.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The project will contribute to a well-functioning urban environment. The NPS-UD defines a well-functioning urban environment as an environment that, amongst other things, is resilient to the likely current and future effects of climate change.

Wellington Airport is a critical aviation connection to New Zealand's capital city, and the Southern Seawall Renewal will futureproof the Airport against the future effects of climate change. The Southern Seawall Renewal is designed to protect infrastructure and the operation of Wellington Airport from rising sea levels and more frequent and severe storms.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Wellington Airport is an important contributor to the Wellington regional economy.

A study undertaken by BERL found that the Airport was responsible for a total of \$1.1 billion of GDP and almost 11,000 full time equivalent jobs in the Wellington area in 2018. Together, the businesses hosted within the airport campus and the adjoining business park currently directly employ 1,342 full time equivalent jobs, in addition to the 130 employed directly by WIAL. These figures are projected to grow as passenger numbers increase in the coming decades.

Without safe and effective sea defences, the Airport will be unable to operate and maintain the significant economic benefits that it delivers to the Wellington regional economy.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The Airport is a critical link for primary industries to supply their goods to the national and international markets. This includes, for example, Port Nicholson Fisheries, a key freight customer out of Wellington Airport. The Southern Seawall Renewal, as noted above, will continue to protect this key transportation link from any potential disruption.

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

No

Please explain your answer here:

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The Southern Seawall Renewal will help safeguard the long-term operation of Wellington Airport against coastal erosion and coastal inundation. The existing seawall is also considered to be vulnerable to earthquakes, and the new seawall will be designed to better withstand such effects. This increased resilience is also important in terms of the lifeline utility function Wellington International Airport fulfills under the Civil Defence Emergency Management Act 2002.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

New Zealand's environmental reporting series Environment Aotearoa 2022, prepared by the Ministry for the Environment and Stats NZ, identifies climate change as a significant environmental issue impacting New Zealand. By increasing the resilience of the Airport to sea level rise and coastal inundation, the Southern Seawall Renewal Project will help address the effects of climate change.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

As set out above, the current statutory planning environment in Wellington is complex, and in a state of change. As such the relevant local and regional planning documents include:

- Regional Policy Statement for the Wellington Region 2013 ("RPS");
- Plan Change 1 to the Regional Policy Statement for the Wellington Region;
- The Natural Resources Plan for The Wellington Region 2023 ("NRP");
- Plan Change 1 to the Natural Resources Plan for the Wellington Regional 2023;
- Wellington City Council Operative District Plan 2000 ("Operative District Plan");
- Wellington City Council Proposed District Plan 2024 ("pWDP"); and
- Our City Tomorrow: Spatial Plan for Wellington City ("Spatial Plan").

Regional Policy Statement for the Wellington Region

The RPS became operative in April 2013 and, as such, is considered to give effect to the overarching direction provided by the NZCPS with respect to the sustainable management of the coastal environment. As discussed in Section 6 above, the project is not inconsistent with the NZCPS, therefore, it can generally be said that it is not inconsistent with the RPS in this respect.

The RPS is currently undergoing Proposed Change 1 to account for new national direction. It includes provisions around enabling urban development, objectives developed in partnership with mana whenua regarding waterways, response to the climate emergency and strengthens provisions around indigenous ecosystems. Proposed Change 1 was publicly notified in August 2022, with Hearings running from June 2023 – March 2024.

The project is generally consistent with the provisions of the RPS and Proposed Change 1, particularly as it relates to climate change mitigation and adaptation, protecting regionally significant infrastructure and hazard mitigation measures. However, Proposed Change 1 seeks to manage water quality in a way that protects and enhances the health and wellbeing of marine ecosystems. While the project has been designed to minimise adverse effects on water quality to the extent practicable – complete protection and enhancement during construction is unlikely to be possible given the nature of the project, however any such effects on water quality are likely to be localised and temporary. WIAL also proposes to use the effects management hierarchy to remedy, mitigate, offset or compensate for any adverse effects arising on the seabed and the marine ecosystems that may be affected by the localised impact of the seawall construction.

Natural Resources Plan for The Wellington Region

The NRP became operative in July 2023 and is an integration and replacement of five regional plans for soil, fresh water, air, discharges to land and the coastal marine area. The sole purpose is to promote the sustainable and integrated management of land and water within the Wellington region.

The NRP is currently undergoing Proposed Change 1, which includes implementation of some regulatory and non-regulatory recommendations from Te Awarua-o-Porirua and Te Whanganui-a-Tara Implementation Programmes, and other regulatory amendments to the NRP.

The project is consistent with many provisions of the NRP, particularly as it relates to the maintenance, use and upgrade of existing structures in the coastal marine area, the protection of Wellington Airport, providing for regionally significant infrastructure, and hazard mitigation measures to protect regionally significant infrastructure.

However, the project is potentially inconsistent with several provisions of Proposed Change 1 in its current form, notably those that relate to the complete avoidance of some adverse effects (irrespective of their scale) in the coastal environment and on indigenous biodiversity values in the coastal environment. While the project has been designed to minimise adverse effects to the extent practicable – complete avoidance of adverse effects (for example, disturbance of little blue penguins / kororā or earthworks over the winter seasons) is unlikely to be possible given the nature of the project. Where complete avoidance is not possible, it is likely that the effects can be managed such that they will be minor or less, or alternatively, the effects management hierarchy can be applied to remedy, mitigate, offset or compensate for any adverse effects on indigenous biodiversity values in the coastal environment.

As noted earlier, the Wellington district level planning environment is currently complex, with both the Operative District Plan and pWDP at different stages of the statutory process. As a result, parts of both plans are “operative”, parts of the pWDP are potentially subject to appeal, and other parts of the pWDP are still in the hearings phase and yet to have any decisions issued with respect to them.

Under the Operative District Plan, the project elements are located within the Airport and Golf Course Recreation Precinct, Outer Residential and the Open Space Zones. Under the pWDP, the same elements are located within the Airport and Natural Open Space Zone.

Under the Operative District Plan, the proposed works are not readily anticipated in their respective land use zones. Notwithstanding this, there is generally a consenting pathway available (albeit challenging) for WIAL to undertake the activities proposed in association with this project.

Conversely, the pWDP has specific policies that allow for hard engineering natural hazard mitigation works and earthworks where they will provide for a reduction in coastal hazard risk and protect regionally significant infrastructure subject to a range of management requirements. With careful project design and management, the project can be designed to fit within the policy context of these provisions.

#### Our City Tomorrow: Spatial Plan for Wellington City

The Spatial Plan was adopted by WCC on 24 June 2021. It provides a long-term integrated framework for managing Wellington's growth and development that meets the goals of the city.

The Spatial Plan seeks infrastructure, facilities and services to be designed, maintained and improved to mitigate and adapt to the effects of natural hazards and climate change, and also recognised that investment is required to make key infrastructure assets more resilient. As such, it is considered that the project is generally consistent with the direction of the Spatial Plan.

Anything else?

Please write your answer here:

The Southern Seawall Renewal project is essential to the safe and efficient long-term operation of Wellington Airport (including the considerable social and economic benefits that the Airport provides for the Wellington region) and must be completed in the immediate future. The project is also important in terms of the lifeline utility function Wellington International Airport fulfills under the Civil Defence Emergency Management Act 2002.

The Southern Seawall was constructed over 50 years ago and is approaching the end of its functional life. Maintenance to date, addressing storm damage and aging of the structure, includes placement of 1780 armour units, repairs to the seawall backslope and crest, and regular wave trap maintenance. The total maintenance cost to date is estimated at \$25 million.

Maintenance costs are expected to increase significantly in future due to greater wave attack caused by climate change, and deterioration of the structure. Indicatively, these maintenance costs could approximately double over the next 50 years if renewal of the seawall is not undertaken. Conversely, the approximate saving in maintenance costs over the next 50 years could be of the order of \$48 million with the renewal project.

There is an increasing risk of extreme storm damage as the seawall armour and crest protection ages. A potential scenario, based on previous extreme damage and partial collapse of the seawall, could cost \$8-10 million to repair. Indirect costs would include local traffic disruption and probable significant disruption to air traffic, resulting from the damage itself or the construction plant used for emergency repairs.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

#### Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

Yes

If yes, please explain:

The effects of climate change on the Southern Seawall underpin the rationale for, and the design of, the Southern Seawall Renewal Project. The project is designed to future-proof Wellington Airport against the effects of climate change, coastal erosion and inundation. As such, the Southern Seawall will be designed to withstand the predicted effects of climate change – including higher sea levels and more frequent and severe storms – and natural hazards such as coastal erosion and inundation (which will both increase in magnitude under climate change predictions).

Furthermore, the risk of earthquakes is ever present in the Wellington region, and the renewed Southern Seawall will be designed to better withstand earthquakes compared to the existing seawall.

#### Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

Wellington International Airport has an excellent record of compliance with all its statutory obligations and there have been no formal enforcement proceeding issued against it.

WIAL proactively oversees all of the resource consents it holds and has a dedicated resource management compliance planner on staff. By taking this approach, potential issues are resolved promptly and in close liaison with the relevant council well before the need for any formal enforcement proceedings to be undertaken.

Load your file here:

No file uploaded

## Declaration

Do you acknowledge your submission will be published on [environment.govt.nz](https://environment.govt.nz) if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Katherine Lyttle

Important notes