

**Before an Independent Hearings Panel of Wellington  
City Council**

**In the matter** of the Resource Management Act 1991 (the **Act**)  
**And**

**In the matter** of hearing of submissions and further submissions on the  
Wellington City Proposed District Plan (**PDP**)

---

**Statement of Evidence of  
Jo Lester for Wellington International Airport Limited**

**Dated: 28 August 2024**

---

---

**Amanda Dewar | Barrister**  
P: 021 2429175  
Email: amanda@amandadewar.com  
PO Box 7  
Christchurch 8140

## **1. INTRODUCTION**

### **Qualifications and Experience**

**1.1** My name is Jo Lester. I am the Airport Planning Manager at Wellington International Airport Limited (**WIAL**) that owns and is responsible for Wellington International Airport (**Wellington Airport or Airport**).

**1.2** I have appeared before the Independent Hearings Panel with respect to Hearings 5, 6, 7, 8, 9 and 10 of the Proposed District Plan. I have set out my qualifications and experience in my previous evidence. I do not repeat that here.

### **Code of Conduct**

**1.3** I am giving evidence based on my experience and position. I accept however, that because I am employed by WIAL, my evidence may not be considered entirely impartial or independent.

**1.4** Subject to that point, and while this is not an Environment Court hearing, I have read and otherwise complied with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023.

## **2. SCOPE OF EVIDENCE**

**2.1** This statement of evidence relates to Hearing Stream 11 (Ecosystems and Indigenous Biodiversity) and focuses on the proposed Significant Natural Area WC175 “Moa Point gravel dunes”.

**2.2** I will provide an outline of:

- The desirability of the western extent of the proposed WC175 SNA for the proposed WIAL southern seawall project on a temporary basis; and
- A historical overview of the development/construction of the airport overtime and the resulting changes in formation of the western extent of Moa Point Beach.

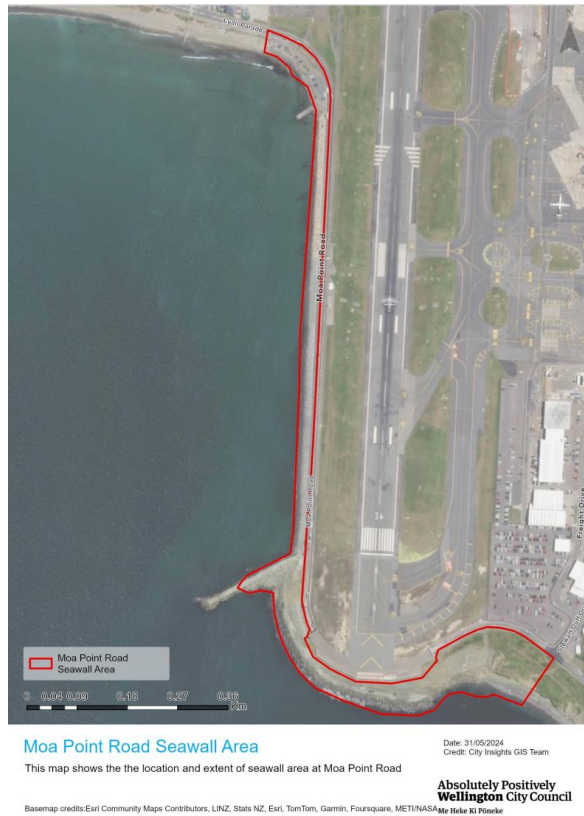
### 3. PREVIOUS HEARING STREAM AND PROPOSED SEAWALL OVERLAY PROJECT

3.1 I provided a brief of evidence for Hearing Stream 7, which related to the Natural Open Space zone provisions, and in particular the seawall area between Lyall Bay Beach and Moa Point. In that evidence I outlined the History of the Seawall area, the function of these seawalls in the protection of not only the Airport, but also major WCC three waters infrastructure, the Airport's requirement to maintain these seawalls, and need for the seawall renewal project.



Figure 1: Seawall Structures Lyall Bay

3.2 I note that as a result of submissions by the Guardians of the Bays during Hearing Stream 8 that the reference to the seawalls surrounding the Airport, as the area “between Lyall Bay and Moa Point” in the PDP provisions, was not sufficiently specific, the Council’s s42A right of reply included a map extent as shown in Figure 2 below. The map extent is proposed to be included in the ePlan, and the term ‘Moa Point Seawall Area’ used within any associated provisions (including within the Natural Open Space zone). This was agreed to both by WIAL and the submitter (Ms Weeber, Guardians of the Bays).



**Figure 2: From Appendix B of Council’s Right of Reply – Hearing Stream 8 (Natural Coastal Environment)**

**3.3** Since Hearing Streams 7 and 8, the Airport has engaged its construction contractors, and there is now a better understanding of the construction methodology required for the Southern Seawall Renewal Project. The construction methodology has identified that the area to the east of the Southern Seawall is needed temporarily during the construction period (subject to the relevant landowner approvals from Wellington City Council) for the following activities:

- (a) Stockpile of construction materials (e.g. rock and concrete Cubipods (concrete armour) for direct supply to the seawall workforce (see Figure 3 below for photos of Cubipods);
- (b) Space for construction plant required for handling rock and Cubipods and accessing the seawall workforce; and
- (c) Parking/standby area for construction plant.

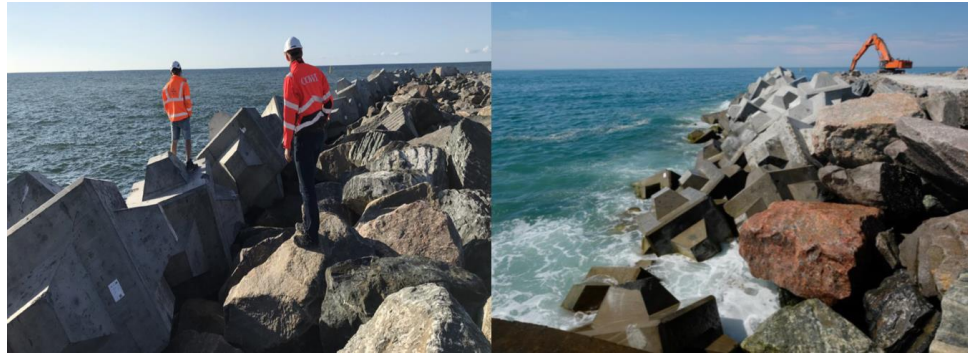


Figure 3: Cubipods<sup>1</sup>

- 3.4** It is considered that the temporary use of this area during construction will:
- (a) Effectively mitigate the requirement to access other nearby stockpiles that may be closer to residential areas at night. This initiative will significantly reduce the noise and lighting impacts to residents and other stakeholders above the Golf Course;
  - (b) Decrease construction risks from breakdowns of delivery equipment and other issues, by providing onsite material surge piles for rock and concrete armour units immediately adjacent to the workface;
  - (c) Enables the safe storage of large construction equipment near the workface and outside the OLS envelope. Importantly the airport can quickly clear the area so that the OLS is met for emergency or diverted flights;
  - (d) Optimises construction productivities by ensuring key materials are at hand / close to work face; and
  - (e) Ensures emergency protection measures (rock & Cubipods) are close to the workface in the event of a storm event occurring quicker / worse than forecast.
- i.e in the event of unexpected damage to the seawalls, the area can be quickly made safe.

---

<sup>1</sup> [Western Breakwater - Port Expansion in Hanstholm - Cubipod](#)

- 3.5** The laydown yard area is proposed to be formed by:
- (a) Site clearance including removal of vegetation, fencing poles and concrete units, and removal and storage of any topsoil (potentially at the southern end of the golf course) for re-use;
  - (b) Minor earthworks (re-grading) to smooth the area's contours;
  - (c) Placement and compaction of aggregate and/or re-used millings to surface the yard area;
  - (d) Concrete entry/exit crossing at the access point to Moa Point Road;
  - (e) Potentially, installation of a modest site office and ablutions building.
- 3.6** Importantly it is proposed that the temporary yard area will be topsoiled and re-planted following construction and potentially be remodelled to form a new penguin habitat ensuring the area is left in an improved condition than currently.
- 3.7** The extent of landside working area during the construction period is as follows:



**Figure 4: Proposed landside working area for the proposed Southern Seawall overlay project.**

#### **4. HISTORICAL OVERVIEW OF CONSTRUCTION AND DEVELOPMENT OF WELLINGTON AIRPORT**

- 4.1** Wellington Aero Club started in 1928 and requested WCC to set aside land for an airport, to which WCC agreed and allocated reserve land at Lyall Bay for this



purpose. The sand dunes were levelled, and a base of broken rock and clay was laid down to stop sand blowing around, and then sown with grass.<sup>2</sup> The original airstrip, which ran in a northwest to southeast alignment opened in 1929, serving both military and civilian users. Due to ongoing safety concerns due to wind, the height of Moa Point Hill (which is in the general area of the current wastewater treatment plant) was lowered to try to improve the safety of approaches to the runway.<sup>3</sup>

**4.2** **Photos A - C** below show Lyall Bay in 1938 – 1951. At this time, Moa Point consisted of exposed rock platforms which can be seen at the bottom right of the images, as well as the earthworks on Moa Point Hill as mentioned above.



**Photo A: Lyall Bay/Moa Point 1938 (Retrolens)**

---

<sup>2</sup> [Papers Past | Newspapers | Evening Post | 30 January 1929 | AIRPORT SHAPING \(natlib.govt.nz\)](#)

<sup>3</sup> [Papers Past | Newspapers | Timaru Herald | 5 September 1936 | INSTRUCTIONAL WORK AT RONGOTAI AERODROME.-In order... \(natlib.govt.nz\)](#)



**Photo B: Lyall Bay/Moa Point 1941 (Retrolens)**



**Photo C: 1951 (Retrolens)**



**4.3** Due to ongoing safety concerns, the central government at the time ceased passenger services in 1947. However, in 1952, the Wellington City Council and Ministry of Works began significant reclamation and land alteration projects to form a new airport/runway in a north-south alignment. A major part of the project involved the complete removal of Rongotai Hill. Spoil from this was then used to reclaim land in both Lyall Bay (and also Evans Bay). The construction incorporated a rock outcrop and reef towards the southern end of the runway and the breakwater covers the end of this reef (as seen on **Photos D - F** below).

**4.4** **Photos D – F** below show Lyall Bay during the runway construction. At this time, the Moa Point area still consisted of exposed rock platforms.



**Photo D: 1954 (Retrolens)**



Photo E: 1955<sup>4</sup>



Photo F: Moa Point 1957 (Retrolens)

**4.5** Photos G - I below show the area in 1959. At this time, it would appear that some coastal reclamation has occurred to the western area of Moa Point Beach.

---

<sup>4</sup> [Aerial view of Rongotai and Moa Point... | Items | National Library of New Zealand | National Library of New Zealand \(natlib.govt.nz\)](#)



Photo G: Southern end 1959



Photo H: 1959

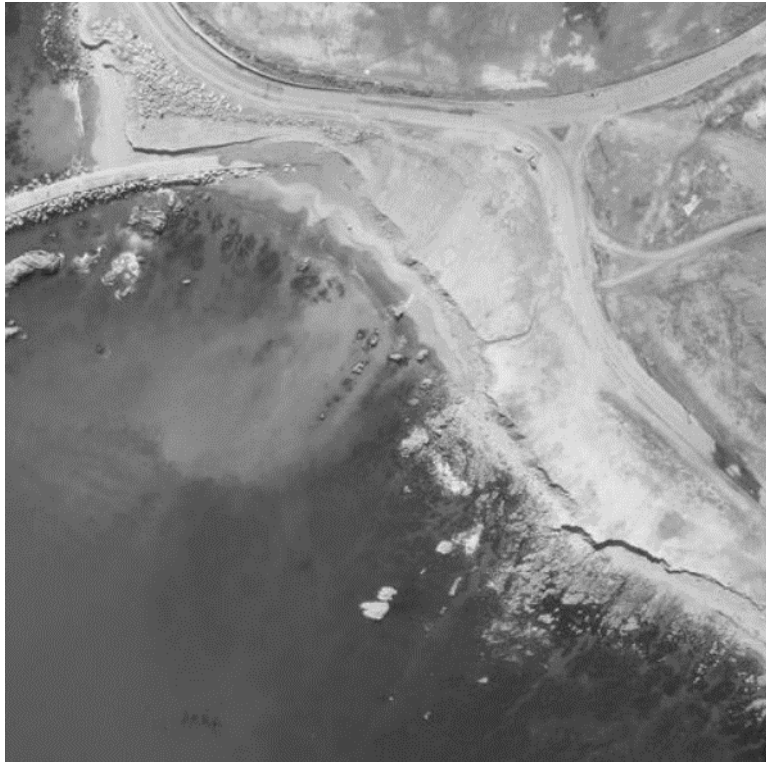


Photo 5I: 1959 (21 Jan)<sup>5</sup>

- 4.6** The new airport officially opened on October 25, 1959, with full services resuming shortly after. The project cost five million pounds, with 1.5 million provided by the Council. The length of the runway at this time was 1630 metres.
- 4.7** In 1972 the runway was extended to 1936 metres which enabled direct jet services to Australia and significantly enhanced Wellington's connectivity. This extension established the current coastal edge of the Airport.
- 4.8** **Photo J** below shows this area in 1970, prior to the extension, which was constructed in 1972, which can be seen in the following photo (**Photo K**) which shows extensive coastal infilling and depositing of fill to the east of the southern seawall.

---

<sup>5</sup> [Rongotai Airport under construction, ... | Items | National Library of New Zealand | National Library of New Zealand \(natlib.govt.nz\)](#)



**Photo J: Moa Point 1970 (Retrolens)**



**Photo K: 1974 after extension to runway (Retrolens)**

- 4.9** Photo L below shows the area to the east of the southern sea wall in 1980. It would appear that this area was used for car parking.





Photo L: 1980 (Retrolens)



Photo M: 1988 (Retrolens)

- 4.10** The southern runway end safety area (RESA) was completed in 2006, with the construction of a tunnel over Moa Point Road at the southern end of the runway. As can be seen from the photos during this period (**Photos N - P** below), the area



of fill to the east of the southern seawall was used as a construction laydown/plant and equipment manoeuvring area.



Photo N: During construction of RESA tunnel 2006 (WIAL files)

**4.11** Photos N – P are from the period of construction of the Southern RESA tunnel. You can see from Photo O and P below, that the area was used for akmon<sup>6</sup> (the current concrete armour used on the seawalls) storage.



Photo O: 2006 construction of the RESA tunnel (WIAL files)

---

<sup>6</sup> An akmon is the concrete armour units on the current seawall - these are 12t and have a height of 2.4 metres with a 2.2 m width and depth. Note the proposed cupipods to be used in the seawall overlay design (at this preliminary design stage) are 15.5t with a nominal 2 metre height/width/depth).

---



Photo P: 2006 (WIAL files)



Photo Q: August 2024

## 5. CONCLUSION

- 5.1 From the historical (and more recent) photos above, it can be seen that the area of land immediately to the east of the Southern Seawall was not part of the original



coastline. Originally the shoreline consisted of exposed rocky shorelines which have since been covered over as part of the construction of the airport in the 1950's and more extensively during the construction of the 1972 runway extension.

- 5.2** The area has been used over the years as public carparking and construction laydown areas for various projects in the area. As noted in Mr Anderson's evidence, this area does not consist of gravel dunes, it is construction fill (as can clearly be seen in **Photo Q** above).



**Photo R: Present Day (note artificial gravel fill ridges)**

- 5.3** Finally, as outlined above, this area will fulfil an important but temporary role as part of the Seawall Renewal Project before it is rehabilitated at the completion of the project, which is considered to be of regional and national significance as it will ensure the resilience of Wellington International Airport and major WCC three waters infrastructure.

**Dated: 28 August 2024**

**Jo Lester**

Airport Planning Manager