

**IN THE ENVIRONMENT COURT
AT WELLINGTON**

**I MUA I TE KŌTI TAIĀU O AOTEAROA
TE WHANGANUI A TARA ROHE**

ENV-2019-WLG-000103

IN THE MATTER of Resource Management Act 1991 (“the Act”)

AND

IN THE MATTER of an appeal pursuant to Clause 14(1) of the First
Schedule to the Act

BETWEEN **HORTICULTURE NEW ZEALAND**

Appellant

AND **GREATER WELLINGTON REGIONAL COUNCIL**

Respondent

**NOTICE OF PERSONS WISHING TO BE PARTY TO PROCEEDINGS
ON BEHALF OF FIRST GAS LIMITED**

Govett Quilliam
THE LAWYERS

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NOTICE OF PERSONS WHO WISH TO BE PARTY TO PROCEEDINGS
Section 274 Resource Management Act 1991

TO: The Registrar
Environment Court
WELLINGTON

1. First Gas Limited (“First Gas”) wishes to be a party to the proceedings *Horticulture New Zealand v Greater Wellington Regional Council* (ENV-2019-WLG-000103). The proceedings concern an appeal against parts of the decisions of the Greater Wellington Regional Council on the Proposed Natural Resources Plan (the “Proposed Plan”).

2. First Gas is both:
 - 2.1 a person who made a submission about the subject matter of the proceedings¹; and

 - 2.2 a person who has an interest in the proceedings that is greater than the interest that the general public has, including for the following reasons:
 - 2.2.1 First Gas owns and operates approximately 126km of high pressure gas transmission pipeline within the Wellington region, which is regionally significant infrastructure;

 - 2.2.2 The relief sought may have implications on First Gas’ ability to safely, effectively and efficiently operate, maintain, upgrade, replace, remove and develop its regionally significant and nationally significant infrastructure.

Trade competition

3. First Gas is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991.

¹ First Gas is the successor of Vector Gas Limited. Vector Gas Limited made a submission and further submission on the Proposed Plan.

Interest in proceedings

- 4. First Gas is interested in the following matters raised by the Appellant:
 - 4.1 Section 4.2 - Beneficial Use and Development: Policy P14 - Incompatible activities adjacent to regionally significant infrastructure, renewable electricity generation activities and significant mineral resources.

Position in respect of relief sought

- 5. First Gas opposes in principle the relief sought by the Appellant for the following reasons:
 - 5.1 The relief sought will not promote the sustainable management of natural and physical resources.
 - 5.2 The relief sought will not give effect to high order planning documents, in particular the Wellington Regional Policy Statement.
 - 5.3 The relief sought will not provide an appropriate regulatory framework for the safe, effective and efficient operation, maintenance, upgrade, replacement, removal and development of First Gas' regionally significant and nationally significant network.

Mediation / Alternative Dispute Resolution

- 6. First Gas agree to participate in mediation or other alternative dispute resolution of the proceedings.

Signature



L P Wallace / R E Eaton
Counsel for First Gas Limited

Date: 11 December 2019

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