

**IN THE ENVIRONMENT COURT
AT WELLINGTON**

ENV - 2019 – WLG - 106

**I MUA I TE KOOTI TAIAO
O AOTEAROA**

In the Matter	of the Resource Management Act 1991
And	
In the Matter	of an appeal under Clause 14(1), Schedule 1 of the Act
Between	Wellington International Airport Limited
	Appellant
And	Greater Wellington Regional Council
	Respondent

**Section 274 Notice by Wellington
International Airport Ltd on appeal by
Minister of Conservation**

Dated: 8 October 2019

Amanda Dewar
Barrister
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Christchurch 8140
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To: The Registrar
Environment Court
Wellington

- Wellington International Airport Limited (**WIAL**) wishes to be a party to the following proceedings:

Minister of Conservation

- WIAL made a submission and further submissions on the Proposed Natural Resources Plan (**PNRP**), and/or
- WIAL has an interest in the proceedings that is greater than the general public has as WIAL owns and operates Regionally Significant Infrastructure at Wellington that adjoins or is within the coastal marine area.
- WIAL is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**Act**).
- WIAL is interested in part of the proceedings.
- The parts of the proceedings WIAL is interested in is:

A016/002	Natural hazards	Seawall
A016/003	Natural hazards	Objective O20: Risk from natural hazards
A016/004	Natural hazards	Objective O21: High hazard areas
A016/014	Wetlands and biodiversity	Objective O31: Outstanding water bodies
A016/015	Wetlands and biodiversity	Objective O35: Significant indigenous biodiversity values
A016/016	Natural hazards	Policy P27: High risk areas
A016/017	Wetlands and biodiversity	Policy P31: Biodiversity, aquatic ecosystem health and mahinga kai
A016/018	Wetlands and biodiversity	Policy P38A: Restoring Te Awarua-o-Porirua Harbour, Wellington Harbour (Port Nicholson), and Lake Wairarapa
A016/024	Management of the CMA	Policy P132: Functional need and efficient use
A016/025	Management of the CMA	Policy P138: Structures in sites with significant values
A016/026	Activities in the CMA	Policy P143: Deposition in a site of significance
A016/027	Activities in the	Policy P144: Dumping in a site

	CMA	with significant values
A016/041	Management of the CMA	Rule R151: Additions or alterations to structures - controlled activity
A016/042	Management of the CMA	Rule R165: Additions or alterations to, or replacements of, existing seawalls - controlled activity
A016/043	Activities in the CMA	Rule R207: Deposition for beach renourishment - controlled activity

7. WIAL is interested in the following particular issues:

Issues covered by the above parts of the appeal relate to matters that WIAL raised or are pursuing and/ or could affect WIAL's property interests or airport operations.

8. WIAL opposes the relief because:

WIAL opposes any aspect of the appeal that is inconsistent with or contrary to its own appeals or to the views that WIAL has communicated during the PNRP process or that will adversely affect its property interests or airport operations in any way.

The relief sought is not consistent with Part 2 and provisions of the Act, the New Zealand Coastal Policy Statement and will not achieve the management of natural and physical resources in a manner that is sustainable, efficient and effective for the Wellington community.

9. WIAL agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 8th day of October 2019



Amanda Dewar

Counsel for Wellington International Airport Ltd

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Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.