

**In the Environment Court of New Zealand  
Wellington Registry**

**I Mua I Te Koti Taiao o Aotearoa  
Te Whanganui-a-Tara**

**ENV-2024-WLG-000044**

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Under the Resource Management Act 1991 (the Act)

In the matter of an appeal under Clause 14(1) of the First Schedule of the Act

And in the matter of the decisions by Wellington Regional Council in respect of Change 1 to the Wellington Regional Policy Statement.

Between **Royal Forest and Bird Protection Society of New Zealand Incorporated**  
Appellant

And **Wellington Regional Council**  
Respondent

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**Notice of Transpower New Zealand Limited's wish to be party to proceedings**

Dated 9 December 2024

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**DENTONS**

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**To**                   The Registrar  
                          Environment Court  
                          Auckland

- 1       Transpower New Zealand limited (**'Transpower'**) wishes to be a party to an appeal by Wellington International Airport Limited (**'Appellant'**) against the decisions of Wellington Regional Council (the **'Respondent'**) on Change 1 to the Wellington Regional Policy Statement (**'RPS'**) (ENV-2024-WLG-000044).
- 2       Transpower:
  - a       Is a person who has an interest in the proceedings that is greater than the interest that the general public has. This is because Transpower is the State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, and the Appellant's relief includes amendments to provisions that relate to these functions; and
  - b       Made a submission (number S10) and further submission (number FS23) about the subject matter of the proceedings.
- 3       Transpower is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
- 4       Transpower is interested in part of the proceedings, being those aspects of the appeal that are set out below at paragraph 5 of this notice.
- 5       Transpower is interested in the following particular issues:
  - a       Amendments sought to Objective 21;
  - b       Amendments sought to Policies 24 and 24A;
  - c       Amendments sought to Policy 24C;
  - d       Amendments sought to Policy 24CC;
  - e       Amendments sought to Policy 24D;
  - f       Amendments sought to Policy 29;
  - g       Amendments sought to Policy 39; and
  - h       Amendments sought to Policy 47.

- 6 Transpower has set out its position in relation to the above provisions and the reasons for those in **Appendix A** to this notice.
- 7 Transpower agrees to participate in mediation or other alternative dispute resolution of the proceedings.

**Dated 9 December 2024**



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## Appendix A Table of GWRC RPS provisions of interest

TABLE OF GWRC RPS CHANGE 1 PROVISIONS OF INTEREST		
PROVISION	POSITION	REASON
Objective 21	Oppose	Transpower opposes the amendments sought as the Appellant's proposed relief will remove support for the improved resilience of infrastructure in the region.
Policies 24 and 24A	Oppose	Transpower opposes the amendments sought as a carve-out for renewable energy generation and electricity transmission from the considerations of 24A is appropriate as this gives effect to the carve out in clause 1.3 of the National Policy Statement for Indigenous Biodiversity (' <b>NPS-IB</b> '), as well as the National Policy Statement for Renewable Energy Generation (' <b>NPS-REG</b> ') and National Policy Statement on Electricity Transmission (' <b>NPS-ET</b> ').
Policy 24C	Oppose	The Appellant's relief relates to the application of the National Policy Statement for Freshwater Management (' <b>NPS-FM</b> ') and the New Zealand Coastal Policy Statement (' <b>NZCPS</b> ') in the terrestrial and coastal environment. Transpower opposes the amendments sought as Policy 24C should reflect that the NPS-ET applies in the coastal environment .
Policy 24CC	Oppose	<p>Transpower opposes the amendments sought as the removal of existing RSI from Policy 24CC would impact Transpower's ability to operate, maintain and upgrade the National Grid and would not give effect to the NPS-ET.</p> <p>Transpower also opposes the amendments sought as requiring both functional and operational need would set the bar too high and is not supported by any regulatory framework.</p>
Policy 24D	Oppose	The Appellant's relief relates to the application of the NPS-FM and the NZCPS in the terrestrial and coastal environment. Transpower opposes the amendments sought that Policy 24D be confined to the terrestrial environment as this does not adequately take account of the NPS-ET and how it might be reconciled with the NZCPS.
Policy 29	Oppose	Transpower opposes the amendments sought as requiring both functional and operational need would set the bar too high and is not supported by any regulatory framework.
Policy 39	Oppose	Transpower opposes the amendments sought as they do not recognise and provide for the benefits of renewable energy generation (' <b>REG</b> ') and regionally significant infrastructure

TABLE OF GWRC RPS CHANGE 1 PROVISIONS OF INTEREST

PROVISION	POSITION	REASON
		('RSI') in the coastal environment, and therefore do not reconcile the NZCPS with the NPS-ET and NPS-REG.
Policy 47	Oppose	The Appellant's amendments relate to the application of the NPS-FM and the NZCPS in the terrestrial and coastal environment. Transpower opposes the amendments sought as they do not adequately take account of the NPS-ET and how it might be reconciled with the NZCPS in the coastal environment.