

**BEFORE THE ENVIRONMENT COURT
I MUA I TE KOOTI TAIAO O AOTEAROA**

IN THE MATTER of the Resource Management Act 1991

AND of appeals under Clause 14 of the First Schedule
of the Act

BETWEEN **WELLINGTON INTERNATIONAL AIRPORT
LIMITED**

(ENV-2019-WLG-000117)

Appellant

AND **WELLINGTON REGIONAL COUNCIL**

Respondent

MEMORANDUM OF COUNSEL

FOR THE WELLINGTON FISH AND GAME COUNCIL

Dated: 27 November 2019

PRESENTED FOR FILING BY:

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MAY IT PLEASE THE COURT

1. At the judicial conference in Wellington on 20 November 2019, Counsel signalled that the Wellington Fish & Game Council (“Fish & Game”) wished to become a party to the Wellington International Airport Limited’s (“WIALs”) appeal on the Proposed Natural Resources Plan for the Greater Wellington Region, insofar as that appeal relates to ‘public access’ matters.
2. Counsel now lodges the following with the Court:
 - a. Interested-party Notice on WIAL’s appeal under s271 of the Act; and
 - b. Application for waiver of time under s281 of the Act.
3. Copies of these documents have been provided to Counsel for the Respondent and to Counsel for WIAL. Counsel for the Respondent and Counsel for WIAL have advised that those parties do not oppose the grant of the waiver sought.
4. No parties to the proceedings will be prejudiced unduly. Although the topic of public access is a topic to which the Respondent has suggested direct engagement may be useful, that engagement has not occurred. Further, under the Respondent Council’s current scheduling mediation is not proposed until March 2020.
5. Counsel respectfully seeks waiver of time for lodging the **attached** section 274 Notice.

S J Ongley
Counsel for the Wellington Fish and Game Council