

**BEFORE THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV-2019-WLG-000117

IN THE MATTER of the Resource Management Act 1991

AND

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

BETWEEN Wellington International Airport Limited
Appellant

AND Greater Wellington Regional Council
Respondent

**NOTICE OF REPRESENTATION AT PROCEEDINGS
UNDER SECTION 274 OF THE RESOURCE MANAGEMENT ACT 1991**

To: The Environment Court Registrar
PO Box 5027
Wellington

1. Powerco Limited (“Powerco”) wishes to be a party to the following proceedings:
 - 1.1 ENV-2019-WLG-000117 between Wellington International Airport Limited (“Appellant”) and Greater Wellington Regional Council (“Respondent”) in relation to the respondent’s decisions on submissions to the Proposed Wellington Regional Plan (“the Proposed Regional Plan”).
2. Powerco lodged submissions on the Proposed Regional Plan on the subject matter of the proceedings.
3. Powerco is New Zealand’s second largest gas and electricity distribution company. In the Wellington Region, Powerco operates both gas and electricity networks. This comprises an electricity network within the Wairarapa, covering the area from south of Eketahuna to Cape Palliser and a gas network covering Wellington City, Hutt Valley and Porirua.
4. Powerco is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
5. Powerco is interested in the following matters raised by the Appellant:
 - 5.1 Objective O17 (page 3)
 - 5.2 Objective O43 (page 4)
 - 5.3 Policy P4: Minimising adverse effects (page 4)
 - 5.4 Policy P28: Hazard mitigation measures (page 6)
 - 5.5 Policy P90: Discharges of hazardous substances (page 11)
 - 5.6 Rule R42: Minor discharges (page 12)
6. The reasons for Powerco’s interest in these matters are as follows:
 - 6.1 Powerco seeks to ensure that the provisions of the Proposed Regional Plan continue to provide appropriate recognition and provision for Powerco’s assets; and do not unreasonably and/or unnecessarily restrict Powerco’s development and maintenance activities. Powerco also seeks to ensure that the Appellant’s

appeal does not prevent the outcomes sought in Powerco's own appeal from being achieved.

6.2 Powerco supported the decisions version of Objective O43, which relates to contaminated land. The relief sought by the Appellant is open to interpretation, particularly the phrase "unacceptable contamination related effects". The implications of the relief sought are uncertain, therefore Powerco wishes to join that part of the appeal as an interested party.

6.3 Powerco has an interest in the relief sought in relation to Objective O17, Policies P4, P28 and P90, and Rule R42. Powerco is not necessarily opposed to the amendments proposed, however, in some instances the implications of the relief sought are uncertain and Powerco wishes to be privy to any further amendments to ensure that the operation, maintenance and upgrade of its assets are appropriately provided for.

7. Powerco agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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David le Marquand
Principal Planning and Policy Consultant
4Sight Consulting Limited

Dated this 9th day of October 2019

Address for Service:

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A copy of this notice has been served on the following parties:

Greater Wellington Regional Council

Via email: RegionalPlanAppeals@gw.govt.nz

Wellington International Airport Limited

C/O – Amanda Dewar

Via email: amanda@amandadewar.com

Minister of Conservation

Via Email: kanton@doc.govt.nz