

**IN THE ENVIRONMENT COURT
AT WELLINGTON**

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

ENV-2019-WLG-000130

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 **THE ROYAL FOREST AND BIRD PROTECTION
SOCIETY OF NEW ZEALAND INCORPORATED**

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 *The Royal Forest and Bird Protection Society of New Zealand Incorporated v Greater Wellington Regional Council* (ENV-2019-WLG-000130). 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 high pressure gas transmission pipelines and a gas distribution network 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 infrastructure.

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

Trade competition

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

Interest in proceedings

4. First Gas is interested in the following matters raised by the Appellant and the relief sought in relation to these matters:

- 4.1 Section 3.2 – Objective O12;
- 4.2 Section 3.4 – Objective O19;
- 4.3 Section 3.4b – Objective O20;
- 4.4 Section 3.10 – 3.11 – Objectives 44 – 48
- 4.5 Section 4.2 – Policy 12A;
- 4.6 Section 4.2 – Policy P13;
- 4.7 Section 4.5 – Policy P32;
- 4.8 Section 4.6.2 – Policy P41;
- 4.9 Section 4.6.5 - Policy 49;
- 4.10 Section 4.8 – Policy 67;
- 4.11 Section 4.8.9 – Policy P102;
- 4.12 Section 4.10 – Policy P138; and
- 4.13 Rule 107.

Position in respect of relief sought

- 5. First Gas opposes the relief sought by the Appellant to the extent it is inconsistent with the relief sought in First Gas' appeal 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; and
 - 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 gas network.

Mediation / Alternative Dispute Resolution

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

Signature



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Counsel for First Gas Limited

Date: 16 December 2019

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