

**IN THE ENVIRONMENT COURT  
AT WELLINGTON**

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

**ENV-2019-WLG-000107**

**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** **LAND MATTERS LIMITED**

**Appellant**

**AND** **GREATER WELLINGTON REGIONAL COUNCIL**

**Respondent**

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**NOTICE OF PERSONS WISHING TO BE PARTY TO PROCEEDINGS  
ON BEHALF OF FIRST GAS LIMITED**

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**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 *Land Matters v Greater Wellington Regional Council* (ENV-2019-WLG-000107). 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 proceedings<sup>1</sup>; 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 approximately 126km of high pressure gas transmission pipeline 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.

**Trade competition**

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

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

### **Interest in proceedings**

4. First Gas is interested in the following matters raised by the Appellant:
  - 4.1 Section 5.5 - Wetlands and beds of lakes and rivers: Rule R104 – Structures in significant natural wetlands;
  - 4.2 Section 5.5 - Wetlands and beds of lakes and rivers: Rule R107 – Activities in significant natural wetlands; and
  - 4.3 Definitions – Natural Wetlands.

### **Position in respect of relief sought**

5. First Gas supports the relief sought by the Appellant in principle to the extent that it :
  - 5.1 provides an appropriate regulatory framework which enables First Gas to safely, effectively and efficiently operate, maintain, upgrade, replace, remove and develop First Gas' regionally significant and nationally significant network;
  - 5.2 promotes the sustainable management of natural and physical resources; and
  - 5.3 gives effect to high order planning documents, in particular the Wellington Regional Policy Statement.

### **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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**L P Wallace / R E Eaton**  
Counsel for First Gas Limited

**Date:** 12 December 2019

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