

**IN THE ENVIRONMENT COURT
AT WELLINGTON**

ENV - 2019 - WLG - 130

**I MUA I TE KOOTI TAIAO
O AOTEAROA**

In the Matter	of the Resource Management Act 1991
And	
In the Matter	of an appeal under Clause 14(1), Schedule 1 of the Act
Between	Wellington International Airport Limited
	Appellant
And	Greater Wellington Regional Council
	Respondent

**Section 274 Notice by Wellington
International Airport Ltd on appeal by
Royal Forest and Bird Protection Soc.**

Dated: 8 October 2019

Amanda Dewar
Barrister
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To: The Registrar
Environment Court
Wellington

1. Wellington International Airport Limited (**WIAL**) wishes to be a party to the following proceedings:

Royal Forest and Bird Protection Society Incorporated

2. WIAL made a submission and further submissions on the Proposed Natural Resources Plan (**PNRP**), and/or
3. WIAL has an interest in the proceedings that is greater than the general public has as WIAL owns and operates Regionally Significant Infrastructure at Wellington that adjoins or is within the coastal marine area.
4. WIAL is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**Act**).
5. WIAL is interested in part of the proceedings.
6. The parts of the proceedings WIAL is interested in is:

A020/003	Overall policy framework of the proposed plan	Objective O1: Ki uta ki tai
A020/004	Overall policy framework of the proposed plan	Objective O5: Fresh and coastal water
A020/005	Beneficial use and development	Objective O12: Benefits of regionally significant infrastructure
A020/006	Wetlands and biodiversity	Objective O18: Low energy receiving environments and Table 3.8 Coastal Waters
A020/007	Wetlands and biodiversity	Objective O25: Aquatic ecosystem health and mahinga kai
A020/008	Natural form and function	Objective O19: Natural processes
A020/009	Natural hazards	Objective O20: Risk from natural hazards
A020/010	Natural hazards	Objective O22: Hard engineering

A020/011	Water quality	Objective O23: Maintain or improve water quality
A020/012	Water quality	Objective O24: Contact recreation and Maori customary use
A020/013	Water quality	Objective O25: Aquatic ecosystem health and mahinga kai
A020/014	Water quality	Objective O31: Outstanding water bodies
A020/015	Wetlands and biodiversity	Objective O35: Significant indigenous biodiversity values
A020/016	Natural form and function	Objective O37: Significant surf breaks
A020/017	Land use in riparian margins and stock access to surface water bodies and the CMA	Objective O44: Land use impacts on soil and water
A020/019	Discharges to land	Objective O46: Discharges to land
A020/020	Soil conservation	Objective O47: Sediment runoff
A020/021	Stormwater	Objective O48: Stormwater networks
A020/022	Beneficial use and development	Policy P12A: Benefits of mineral resource utilisation
A020/023	Beneficial use and development	Policy P13: Existing regionally significant infrastructure and renewable electricity generation activities
A020/024	Beneficial use and development	Policy P15: Flood protection activities
A020/025	Beneficial use and development	Policy P16: New flood protection and erosion control
A020/026	Natural hazards	Policy P30: Natural buffers
A020/027	Wetlands and biodiversity	Policy P31: Biodiversity, aquatic ecosystem health and mahinga kai
A020/028	Wetlands and biodiversity	Policy P32: Adverse effects on aquatic ecosystem health and mahinga kai
A020/030	Wetlands and biodiversity	Policy P41: Managing adverse effects on ecosystems and habitats with significant indigenous biodiversity values
A020/032	Natural form and function	Policy P49: Use and development adjacent to outstanding natural features and landscapes and special amenity

		landscapes
A020/033	Natural form and function	Policy P51: Significant surf breaks
A020/034	Discharges to land	Policy P62: Promoting discharges to land
A020/037	Water quality	Policy P67: Minimising discharges to water or land
A020/038	Water quality	Policy P70: Managing point source discharges for aquatic ecosystem health and mahinga kai
A020/040	Stormwater	Policy P78: Managing stormwater from large sites
A020/041	Discharges to land	Policy P95: Discharges to land
A020/047	Management of the CMA	Policy P138: Structures in sites with significant values

7. WIAL is interested in the following particular issues:

Issues covered by the above parts of the appeal relate to matters that WIAL raised or are pursuing and/ or could affect WIAL's property interests or airport operations.

8. WIAL opposes the relief because:

WIAL opposes any aspect of the appeal that is inconsistent with or contrary to its own appeals or to the views that WIAL has communicated during the PNRP process or that will adversely affect its property interests or airport operations in any way.

The relief sought is not consistent with Part 2 and provisions of the Act, the New Zealand Coastal Policy Statement and will not achieve the management of natural and physical resources in a manner that is sustainable, efficient and effective for the Wellington community.

9. WIAL agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 8th day of October 2019



Amanda Dewar _____

Counsel for Wellington International Airport Ltd

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Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.