

**In the Environment Court
I Mua I Te Kōti Taiao o Aotearoa
Wellington Registry
Te Whanganui-a-Tara Rohe**

ENV-2024-WLG-000051

Under the Resource Management Act 1991 and in the matter of an application under Section 274 of the Act

Between **Winstone Aggregates**
Appellant

And **Greater Wellington Regional Council**
Respondent

Notice of Genesis Energy Limited's wish to be party to proceedings

9 December 2024

BELL GULLY

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To: The Registrar
Environment Court
Wellington

1. Genesis Energy Limited (**Genesis**) wishes to be a party to the following proceedings:
 - (a) *ENV-2024-WLG-000051 – Winstone Aggregates v Greater Wellington Regional Council.*
2. Genesis made a submission about the subject matter of the proceedings.
3. Genesis is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991 (the **Act**).
4. Genesis is interested in part of the proceedings.
5. Genesis is interested in the following parts of the proceedings:
 - (a) Policy IE.2A;
 - (b) Policy 47; and
 - (c) Chapter 2A – Related Definitions.
6. Genesis is interested in the following particular issues:
 - (a) Recognition of renewable electricity generation and how the effects of those activities on indigenous biodiversity are managed.
7. Genesis supports the relief sought with respect to deleting Policy IE.2A, including for the following reasons:
 - (a) The decisions version of Policy IE.2A does not recognise and provide for renewable electricity generation. It is also inconsistent with the National Policy Statement for Renewable Electricity Generation and Part 2 of the Act, including the requirement to have regard to the benefits to be derived from the use and development of renewable energy.

8. Genesis opposes the relief sought to amend Policy 47, including for the following reasons:
 - (a) The relief sought deletes the exemption for renewable electricity generation activities from Policy 47(i), which does not appropriately provide for and recognise the benefits of renewable electricity generation, or acknowledge the practical constraints associated with such infrastructure; and
 - (b) The relief sought is otherwise contrary to the National Policy Statement for Renewable Electricity Generation and Part 2 of the Act, including the requirement to have regard to the benefits to be derived from the use and development of renewable energy.

9. Genesis is neutral with respect to the relief sought to amend Chapter 2A Related Definitions, including for the following reasons:
 - (a) The definitions subject to the appeal are extensive, and include definitions that relate to the operation of renewable electricity generation activities. Genesis therefore wishes to be involved in any amendments to these definitions that may affect its interests.

10. Genesis agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 9 December 2024



N J Garvan / L M Lincoln
Counsel for Genesis Energy Limited

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Advice

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