In the Environment Court at Wellington I Mua I te Kōti Taiao Te Whanganui-a-Tara Rohe ENV-2024-WLG-000044

Under the Resource Management Act

1991 (Act)

In the Matter of an appeal under Clause 14(1),

Schedule 1 of the Act

Between Royal Forest and Bird Protection

Society of New Zealand

Appellant

And Greater Wellington Regional

Council

Respondent

Notice by Wellington International Airport Ltd of wish to be party to proceedings

Dated: 9 December 2024

Amanda Dewar | Barrister

P: 021 2429175

Email: amanda@amandadewar.com

PO Box 7

Christchurch 8140

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 of New Zealand v Greater Wellington Regional Council

- WIAL made a submission and/or further submissions about the subject matter of the proceedings. It also has an interest in the proceedings that is greater than the interest that the general public has as the owner and operator of Wellington International Airport.
- WIAL is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
- 4. WIAL is interested in part of the proceedings.
- 5. The part of the proceedings and the particular issues WIAL is interested in are:

Definition of RSI		WIAL submitted on this provision.
		WIAL opposes the relief sought.
Objective 19	The <i>risks</i> to people, communities, businesses, property, and infrastructure	WIAL submitted on this provision.
	from <i>natural hazards</i> and the effects of climate change effects are avoided or <i>minimised</i> .	WIAL opposes the relief sought.
Objective 21	The resilience of our C	WIAL submitted on this
	communities,	provision.
	<u>infrastructure</u> are more	
	resilient to natural hazards,	WIAL opposes the relief
	including the impacts and	sought.
	the natural environment to	
	natural hazards is	
	strengthened improved,	
	including to the short, medium, and long-term	
	medium, and long-term effects of climate change,	
	oncolo of official de charige,	

	and sea level rise, is	
	strengthened, and people	
	are better prepared for the consequences of natural	
	hazard events.	
Policy CC.7	Protecting, restoring, enhancing and sustainably managing ecosystems that	WIAL submitted on this provision.
	provide nature-based solutions to climate change – non-regulatory	WIAL opposes the relief sought.
Policy CC.8	Prioritising the reduction of greenhouse gas emissions – district	WIAL submitted on this provision.
	and regional plans	WIAL is neutral as to the requested amendments sought but is interested in any alternative relief which may alter the drafting of the provision.
Policy 24C	Managing adverse effects on indigenous biodiversity values in the coastal environment – district and	WIAL has submitted on Policy 24 and has appealed Policy 24C.
	regional plans	WIAL opposes the relief sought.
Policy 24CC	Existing regionally significant infrastructure and existing REG activities in the coastal environment	WIAL has submitted on Policy 24 and has appealed Policy 24CC.
	- regional and district plans	WIAL opposes the relief sought.
Policy 24D	Managing the effects of REG activities and ET activities on indigenous ecosystems and habitats with significant indigenous biodiversity	WIAL is interested in the relief sought and is interested in any alternative relief which may alter the drafting of the provision.
	values and other significant habitats of indigenous fauna – district and regional plans	
Policy 29	Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans	WIAL submitted on this provision. WIAL opposes the relief
		sought.
Policy 39	Recognising the benefits from renewable energy and regionally significant	WIAL submitted on this provision.
	infrastructure - consideration	WIAL opposes the relief sought.

Policy 47	Managing	effects	on	WIAL submitted on and
	indigenous	ecosystems		appealed this provision.
	and hab	oitats	with	
	significant indigenous		nous	WIAL opposes parts of the
	biodiversity	values	and	relief.
	other significant habitats of			
	indigenous	fauna	-	
	consideration	n		

- 6. WIAL supports or opposes the relief because:
 - (a) 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 RPS PC1 process or that will adversely affect its property interests or airport operations in any way.
 - (b) Where the relief sought by the Appellant is opposed, it is not consistent with Part 2 and provisions of the Act, the higher order documents and will not achieve the management of natural and physical resources in a manner that is sustainable, efficient and effective for the Wellington community.
- 7. WIAL agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 9th day of December 2024

Amanda Dewar

Counsel for Wellington International Airport Ltd

Address for Service for the Appellant:

Amanda Dewar Barrister PO Box 7 Christchurch 8140

Email: amanda@amandadewar.com

Phone:021 242 9175

To:

Registrar Respondent Appellant

Advice

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