

BEFORE THE ENVIRONMENT COURT AT AUCKLAND

ENV-2024-000067

IN THE MATTER of the Resource Management Act 1991 (*RMA*)

AND

IN THE MATTER of section 274 of the RMA

BETWEEN WIRI OIL SERVICES LIMITED
Appellant

AND AUCKLAND TRANSPORT
Respondent

NOTICE OF WISH TO BE A PARTY TO PROCEEDINGS PURSUANT TO
SECTION 274 OF THE RESOURCE MANAGEMENT ACT 1991

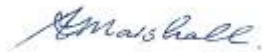
AUCKLAND INTERNATIONAL AIRPORT LIMITED

To: The Registrar
Environment Court
Auckland
Via email: EnvironmentCourt@justice.govt.nz

1. Auckland International Airport Limited (*Auckland Airport*) wishes to be a party to an appeal by Wiri Oil Services Limited (*WOSL*) in relation to the Respondent's decisions on the Notice of Requirement (*NOR4A*) Airport to Botany Bus Rapid Transit from SH20/20B Interchange to Orrs Road.
2. This notice is made as Auckland Airport submitted on the provisions of *NOR4A* to which this appeal relates.
3. Auckland Airport is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
4. Auckland Airport has an interest in the following part of the Appeal:
 - (a) Condition 26¹ (Network Utility Management Plan (NUMP), of the Respondents decision on *NOR4A* – Airport to Botany Bus Rapid Transit from SH20/20B Interchange to Orrs Road.
- 4.1 Auckland Airport has also appealed Condition 26 of the Respondent's decision on *NOR4A*.
- 4.2 The relief sought in the Appeal by *WOSL* is on the basis:
 - (i) That the proposed works enabled by way of *NOR4A* have the potential to result in adverse effects on the Wiri to Airport Pipeline (*WAP*) and Ruakākā to Auckland Pipeline (*RAP*) pipeline corridors.
 - (ii) The proximity of these infrastructure assets will require a co-ordinated approach to management of these pipeline corridors.
 - (iii) Condition 26 does not adequately recognise and provide for the operation of these pipeline corridors where there is overlap with *NOR4A* and sustainable and integrated management of nationally significant infrastructure is therefore not achieved.
 - (iv) The NUMP is intended to manage the interface with affected Requiring Authorities but there is no requirement to incorporate, and give effect to, relevant conditions or issues raised by requiring authorities under s177RMA.
 - (v) Amendments to Condition 26 to reference *WOSL* and their respective pipeline requirements have been requested to be included in this condition.
- 4.3 Auckland Airport has an interest in how the designation addresses the *RAP* and other network utilities, including the interface matters raised by *WOSL* in its appeal.

¹ referred to as Condition 28 in *WOSL* Appeal

- 4.4 Auckland Airport supports the intent of relief being sought by WOSL (to the extent that it is consistent with the relief in the Auckland Airport Appeal) because it:
- (i) will assist in ensuring NoR4A achieves appropriate integration with existing adjacent land uses, utility networks, and future work programmes that affect Auckland Airport;
 - (ii) will promote the sustainable management of natural and physical resources within the Auckland region, and is therefore consistent with Part 2 and other provisions of the RMA;
 - (iii) will meet the reasonably foreseeable needs of future generations;
 - (iv) will facilitate the efficient use and development of natural and physical resources; and
 - (v) avoids, remedies or mitigates actual or potential adverse effects on the environment.
- 4.5 Auckland Airport agrees to participate in mediation or alternative dispute resolution of the proceedings.



Andrea Marshall
Auckland Airport (Head of Master Planning and Sustainability)
On behalf of Auckland International Airport Limited

Dated: 22 April 2024

Address for service of Auckland Airport:

Auckland Airport
c/-Planz Consultants Limited
Contact: Sam Flewellen
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A copy of this notice has been served on the following parties:

Wiri Oil Services Limited

K3 Legal Ltd

Attention: Chris Lee

Email: chris@k3.co.nz

With copy to:

Rob Enright, Barrister

Email: rob@publiclaw9.com

Auckland Transport

Auckland Transport and Waka Kotahi

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