

**In the Environment Court
Christchurch Registry**

ENV-2018-CHC-000050

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

Between

Royal Forest and Bird Protection Society of New Zealand Inc

Appellant

and

Southland Regional Council

Respondent

and

Transpower New Zealand Limited

Section 274 Party

**Notice of Transpower New Zealand Limited's wish to be
party to proceedings**

22 June 2018

BELL GULLY

BARRISTERS AND SOLICITORS

A J L BEATSON / LM LINCOLN

COUNSEL FOR THE SECTION 274 PARTY

WELLINGTON LEVEL 21, ANZ CENTRE, 171 FEATHERSTON STREET

PO BOX 1291, WELLINGTON 6140, DX SX11164, NEW ZEALAND

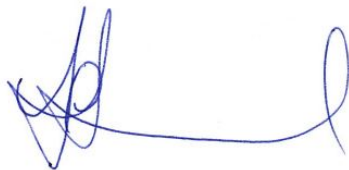
TEL 64 4 915 6800 FAX 64 4 915 6810 EMAIL LAURA.LINCOLN@BELLGULLY.COM

To: The Registrar
Environment Court
Christchurch

1. Transpower New Zealand Limited (**Transpower**) wishes to be a party to the following proceedings:
 - (a) ENV-2018-CHC-000050 *Royal Forest and Bird Protection Society of New Zealand Inc v Southland Regional Council*.
2. Transpower made a further submission about the subject matter of the proceedings, and has an interest in the proceedings that is greater than the interest that the general public has as the owner and operator of the National Grid which the appeal relates to.
3. Transpower is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991 (the **RMA**).
4. Transpower is interested in part of the proceedings.
5. Transpower is interested in the following parts of the proceedings:
 - (a) Objective 9B;
 - (b) Objectives 13, 13A and 13B;
 - (c) Policies 15, 15A, 15B and 15C;
 - (d) Policy 26A; and
 - (e) Policy 28.
6. Transpower opposes the relief sought, including for the following reasons:
 - (a) Transpower considers that it is necessary that the Proposed Plan enables the effective development, operation, maintenance and upgrading of regionally significant, nationally significant and critical infrastructure, including the National Grid;

- (b) Transpower considers the decisions version of Policies 15A, 15B, 15C and 28 better reflects the general approach to the management of effects in section 5 of the RMA;
- (c) The relief sought has the potential to adversely affect the operation, maintenance, upgrade, and development of the National Grid;
- (d) The relief sought fails to reflect the policy direction in the Southland Regional Policy Statement;
- (e) The relief sought fails to give effect to the National Policy Statement on Electricity Transmission 2008; and
- (f) The relief sought is otherwise contrary to Part 2 and the purpose of the RMA, being to promote the sustainable management of natural and physical resources.

7. Transpower agrees to participate in mediation or other alternative dispute resolution of the proceedings.



AJL Beatson / LM Lincoln
Counsel for Transpower New Zealand Limited

Dated 22 June 2018

Address for service:

Transpower New Zealand Limited
C/- Bell Gully
171 Featherston Street
PO Box 1291
Wellington 6140
Attention: Laura Lincoln

Telephone: (04) 915 6800
Facsimile: (04) 915 6810
Email: laura.lincoln@bellgully.com

Advice

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