

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Notice of Motion under Section 87G requesting the granting of resource consents to Wellington International Airport Limited for the Wellington International Airport Extension of Runway: Construction, Operation and Maintenance (the **Application**)

BY **WELLINGTON INTERNATIONAL AIRPORT LIMITED**
Applicant

**JOINT MEMORANDUM OF COUNSEL FOR AIR NEW ZEALAND LIMITED
AND THE BOARD OF AIRLINE REPRESENTATIVES NEW ZEALAND
INCORPORATED**

16 March 2018



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Counsel instructed: Derek Nolan QC

MAY IT PLEASE THE COURT:

1. This joint memorandum is filed on behalf of Air New Zealand Limited (**ANZL**) and the Board of Airline Representatives New Zealand Incorporated (**BARNZ**) in response to the Court's direction of 1 March 2018.
2. Counsel have reviewed the Memorandum of Counsel for Guardians of the Bays Incorporated (**GOTB**), dated 16 March 2018 (the **GOTB Memorandum**).
3. ANZL and BARNZ:
 - (a) generally agree with the concerns expressed in the GOTB Memorandum;
 - (b) support the foreshadowed orders described in paragraph 19 of the GOTB Memorandum; and
 - (c) support the request for directions in paragraph 20 of the GOTB Memorandum.
4. In particular ANZL and BARNZ consider it reasonable:
 - (a) for the parties to this proceeding to have details of the Runway Safety Area Extension that Wellington International Airport Limited (**WIAL**) intends to seek the Director of Civil Aviation's (the **Director**) approval for (including copies of all information that WIAL puts before the Director in support of its revised application); and
 - (b) that WIAL provide monthly updates to the Environment Court and the parties to this proceeding on the progress of the revised application to the Director.

DATED at Wellington and Auckland this 16th day of March 2018



**Derek Nolan QC / Horiana Irwin-Easthope /
Te Rangimārie Williams**
Counsel for ANZL



Gill Chappell
Counsel for BARNZ