

**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**")

**BETWEEN** **THE BOARD OF AIRLINE REPRESENTATIVES NEW ZEALAND INC**

Section 274 party

**AND** **WELLINGTON INTERNATIONAL AIRPORT LIMITED**

Applicant

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**MEMORANDUM OF COUNSEL FOR THE BOARD OF AIRLINE  
REPRESENTATIVES NEW ZEALAND INCORPORATED**

**9 NOVEMBER 2018**

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**Solicitors:**

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1. This memorandum is filed on behalf of the Board of Airline Representatives New Zealand Incorporated (“**BARNZ**”) in response to the Court’s 20<sup>th</sup> Minute of 1 November 2018 inviting comments from interested parties on the request by Wellington International Airport Limited dated 31 October 2018 to further adjourn the proceedings to mid-March 2019.
2. BARNZ’s position to the previous applications for adjournment were expressed by way of memoranda dated 16 March 2018 and submissions to the Court at the judicial conference held on 13 April 2018.
3. In that regard, its overall position is not changed. It remains concerned at the continuing delay since the filing of the application in April 2016 and that this state of affairs perpetuates:
  - (a) Uncertainty for the parties which is increasingly exacerbated by the continuing delays;
  - (b) Questions as to the ‘staleness’ of the information before the Court; and
  - (c) Questions as to the final nature of the application before the Court and the associated ability of the parties to respond in a timely manner to updated information (while acknowledging previous assurances that the parties will be provided with appropriate time to respond to any amended application).
4. These concerns are expressed in the context of its own position representing the airlines, and it continues to recognise that other parties may be more directly affected. As such, and at this juncture, BARNZ advises that it abides the decision of the Court as to whether further delay is appropriate. It nevertheless may wish to provide submissions to the Court in the event of:
  - (a) any hearing to determine an application to strike out the proceedings;  
or
  - (b) further applications to adjourn.

**DATED** at Auckland this 9<sup>th</sup> day of November 2018



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**Gill Chappell**  
Counsel for BARNZ