

**Before the Environment Court
at Wellington**

In the Matter of section 87G of the Resource Management Act 1991

And

In the Matter of the direct referral of the Application for resource consents associated with an extension to the runway by Wellington International Airport Limited

(ENV-2016-WLG-00058)

**Memorandum of Counsel for
Wellington International Airport Limited**

Dated: 11 April 2019

MAY IT PLEASE THE COURT:

1. This memorandum is filed on behalf of Wellington International Airport Limited (**WIAL**).
2. In December 2018, the Court granted WIAL a further adjournment of its resource consent application for a runway extension (**Application**) until 31 May 2019.
3. This date was based on the time the Civil Aviation Authority (**CAA**) indicated would be required for it to make a decision on WIAL's RESA proposal.
4. The CAA has recently advised WIAL that an updated modelling tool for RESA configuration has become recognised internationally and that WIAL should consider applying the updated methodology to its RESA proposal.
5. In response to this WIAL urgently sought advice from an international expert and has concluded it would be appropriate that the updated model be utilised.
6. While the updated modelling work is proceeding as quickly as possible WIAL cannot confidently say when this work will be completed or how long the CAA and its international experts will need to review that work.
7. As a consequence the CAA decision on WIAL's RESA proposal will be delayed.
8. Accordingly WIAL will not be in a position to meet the Court's 31 May deadline and in these circumstances WIAL considers that to provide clarity for all parties the present Application should be withdrawn.
9. Accordingly, WIAL withdraws its Application.
10. WIAL wishes to acknowledge the forbearance of the Court and the parties. WIAL intends to make an updated resource consent application as soon as

possible and based on current information anticipates this will be in early 2020.

Dated: 11 April 2019

A handwritten signature in blue ink, appearing to read 'A. Dewar', written over a horizontal line.

Amanda Dewar

Solicitor for Wellington International Airport Limited