

## **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 in respect of Strathmore Park Progressive and Beautifying Association inc.**

President:  
Karl Frost  
49 Kinghorne St.  
Strathmore Park

Secretary/ Treasurer:  
Glenn Kingston  
53 Tannadyce St.  
Strathmore Park

### **May it please the Court:**

#### **Introduction**

1. This memorandum is filed in response to the Twenty Second Minute of the Environment Court dated 26 November 2018 and makes comment on and provides support to the Strikeout Affidavits of Guardians of the Bays and Jumpjet.
2. For a period approaching 2 years the applicant has had all S274 submitter's issues before them, stated in writing, with suggested mitigation proposals where appropriate. We are disappointed that the single issue of RESA length has stalled all other discussions, negotiations & undertakings that could have taken place between the applicant & individual submitters. To date the applicant has made no further contact in respect of this application with affected residents in Strathmore Park or with our Association during the adjournment period and by this lack of action we expect the same situation to apply during the further adjournment now sought. Consequently we see no benefit to us with a further adjournment and accordingly support the strikeout Affidavits.
3. In response to the previous adjournment application our Association expressed the expectation that a number of issues outlined as possibilities in the original application would be more specific in a fresh application and also that WIAL would have the opportunity to mitigate some matters on which submitters have based their actions to date. At this time we consider that this expectation will now only be realised by striking out the current application which will force re-submission.
4. With daytime flights of the larger 777 aircraft now regularly taking place, fears are rising in our Community that the extended runway will see more of these events which could well creep into the late night and after midnight curfew exempt international arrivals period since wide body jets will almost all be from overseas.. The strikeout process will thus provide a fresh approach from submitters seeking further curfew rule safeguards.

5. We respectfully request the Environment Court to agree to the strikeout which will ensure that the applicant seriously considers our existing issues and will also provide us with the opportunity to consult our members and residents on fresh issues now being brought to our notice.

6. In the case that strikeout is not directed we re-iterate our earlier resolution which requested that the consent application should be publically re-notified in its entirety to ensure that new submitters may enter the process and enable them to be on a similar footing to those currently taking part. In view of the excessive delay now being faced we further request at this point that the Environment Court rules that existing submitters be also given the opportunity to revise their submissions to date with provision to also introduce new material of relevance.

7. The above points fairly represent our Association's position whilst recognising that other parties may be more directly affected. As such our Association further advises that it will abide by the direction of the Court in respect of a strikeout or adjournment decision and also abide by any conditions which are attached.

8. In the event that even further delay beyond that sought is applied for by the applicant our Association reserves the right to make further submissions to the Court.

Dated: 9<sup>th</sup> December 2018

A handwritten signature in black ink, appearing to read 'Glenn Kingston', written in a cursive style.

Glenn Kingston (Secretary)