

**In the Environment Court of New Zealand
Wellington Registry**

**I Te Kōti Taiao O Aotearoa
Te Whanganui-a-Tara Rohe**

ENV-2024-WLG-000037

Under the Resource Management Act 1991 (the Act)

In the matter of an appeal under clause 14(1) of the first schedule of the Act

Between **Minister of Defence**
Appellant

And **Manawatū-Whanganui Regional Council**
Respondent

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

Dated 9 September 2024

DENTONS

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To The Registrar
 Environment Court
 Wellington

1 Transpower New Zealand limited (**'Transpower'**) wishes to be a party to an appeal by Minister of Defence (**'Appellant'**) against the decisions of Manawatū-Whanganui Regional Council (**'Respondent'**) on Plan Change 3 (Urban Development) to the Manawatū-Whanganui One Plan (**'PC3'**).

2 Transpower:

a Has an interest in the proceedings that is greater than the interest that the general public has. This is because Transpower is the State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, and the Appellant's relief includes amendments to provisions that relate to these functions; and

b Made a submission (S1) about the subject matter of the proceedings.

3 Transpower is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.

4 Transpower is interested in part of the proceedings, being those aspects of the appeal that are set out below at paragraph 6 of this notice.

5 The parts of the proceedings Transpower is interested in relate to:

a Providing for the effective operation, maintenance, upgrading and development of the National Grid; and

b Managing the effects of third party activities on the operation, maintenance, upgrading and development of the National Grid.

6 Transpower is interested in the following particular issues:

a Objective UFD-O3; and

b Policy UFD-P4.

7 Transpower has set out its position in relation to the above provisions and the reasons for that position in **Appendix A** to this notice.

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

Dated 9 September 2024



Nicky McIndoe

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Appendix A Transpower's positions

TRANSPOWER'S POSITIONS		
PROVISION	POSITION ON RELIEF SOUGHT	REASON
UFD-O3	Neutral	<p>The Appellant seeks that UFD-O3 avoid (rather than manages) adverse effects, including on other physical resources (as identified in EIT-P1).</p> <p>The Appellant is seeking relief in relation to the same parts of UFD-O3(1)(f) as Transpower, as well as seeking to include reference to 'other physical resources' as identified in EIT-P1, which includes the National Grid.</p> <p>Transpower is neutral on the relief sought, provided that the amendments give effect to the NPSET.</p>
UFD-P4	Neutral	<p>The Appellant seeks that UFD-P4(1)(f) also covers infrastructure and physical resources of regional or national importance (as identified in EIT-P1). The Appellant further seeks that UFD-P4(2)(d) avoids (rather than manages) adverse effects on land.</p> <p>The Appellant is seeking similar relief to Transpower in respect of UFD-P4(1)(f), as well as relief that would protect existing activities from urban intensification and expansion. The Appellant is also seeking reference to infrastructure as identified in EIT-P1, which includes the National Grid.</p> <p>Transpower is neutral on the relief sought, provided that the amendments give effect to the NPSET.</p>