

**In the Environment Court
I Mua I Te Kōti Taiao o Aotearoa
Wellington Registry
Te Whanganui-a-Tara Rohe**

ENV-2024-WLG-000044

Under the Resource Management Act 1991 and in the matter of an application under Section 274 of the Act

Between **The Royal Forest and Bird Protection Society of New Zealand Incorporated**
Appellant

And **Greater Wellington Regional Council**
Respondent

Notice of Genesis Energy Limited's wish to be party to proceedings

9 December 2024

BELL GULLY

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To: The Registrar
Environment Court
Wellington

1. Genesis Energy Limited (**Genesis**) wishes to be a party to the following proceedings:
 - (a) *ENV-2024-WLG-000044 – The Royal Forest and Bird Protection Society of New Zealand Incorporated v Greater Wellington Regional Council.*
2. Genesis made a submission about the subject matter of the proceedings and has an interest in the proceedings that is greater than the interest that the general public has, as the owner of the consented wind farm at Castle Hill in northern Wairarapa within the Wellington region.
3. Genesis is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991 (the **Act**).
4. Genesis is interested in part of the proceedings.
5. Genesis is interested in the following parts of the proceedings:
 - (a) Policy 24 and Policy 24A;
 - (b) Policy 24C;
 - (c) Policy 24CC;
 - (d) Policy 24D;
 - (e) Policy 39;
 - (f) Policy 47;
 - (g) Objective 21; and
 - (h) Policy 29.

6. Genesis is interested in the following particular issues:
 - (a) Recognition of renewable electricity generation;
 - (b) How the effects of renewable electricity generation activities on indigenous biodiversity are managed; and
 - (c) Natural hazards.

7. Genesis opposes the relief sought with respect to these provisions, including for the following reasons:
 - (a) The relief sought does not appropriately provide for and recognise the benefits of renewable electricity generation, or acknowledge the practical constraints associated with such infrastructure including with respect to indigenous biodiversity and natural hazard areas;
 - (b) The amendments sought to Objective 21 do not appropriately provide for the resilience of infrastructure and renewable energy generation activities to natural hazards; and
 - (c) The relief sought is otherwise contrary to the National Policy Statement for Renewable Electricity Generation and Part 2 of the Act, including the requirement to have regard to the benefits to be derived from the use and development of renewable energy.

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

Dated: 9 December 2024



N J Garvan / L M Lincoln
Counsel for Genesis Energy Limited

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Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.