

**Before an Independent Hearing Panel and Freshwater Hearing  
Panel of Greater Wellington Regional Council**

**Under the** Resource Management Act 1991

**In the matter** of Proposed Plan Change 1 to the Wellington Regional Policy  
Statement – Hearing Stream 7 – RSI Definition

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**MEMORANDUM OF COUNSEL ON BEHALF OF WELLINGTON INTERNATIONAL  
AIRPORT LIMITED**

**Hearing Stream 7 – RSI Definition – Response to Rebuttal Evidence**

**15 April 2024**

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**1.1** WIAL and its advisors have reviewed the rebuttal evidence and legal submissions of the Council that relate to the definition of Regionally Significant Infrastructure (**RSI**) and in particular the reference to Wellington International Airport (**S42A Rebuttal**).

**1.2** The S42A Rebuttal recommends that the definition of RSI as it refers to Wellington International Airport be amended to:

Wellington International Airport including all supporting navigational infrastructure including its infrastructure and any buildings, installations, and equipment on or adjacent to any such area used in connection with the airport or its administration

This includes infrastructure, buildings, installations and equipment not located on airport land.

**1.3** While not necessarily agreeing with all of the S42A Rebuttal analysis of the issue, WIAL can support the recommendation.

**1.4** Accordingly it seeks leave from the Panel to be excused from the hearing time allocated to WIAL scheduled for tomorrow at 9:30am.



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**Amanda Dewar**  
Counsel for WIAL