

Form 33
Notice of person's wish to be party to proceedings

Section 274, Resource Management Act 1991

To the Registrar
Environment Court
Wellington

We, Chorus New Zealand Limited, Fortysouth Group LP, One New Zealand Group Limited and Spark New Zealand Trading Limited wish to be a party to the following proceedings:

- *ENV-2025-WLG-15, in particular an appeal from Royal Forest and Bird Protection Society of New Zealand Incorporated on the Proposed Wellington District Plan.*

We are a person who has an interest that is greater than the interest the general public has due to the extensive telecommunications and broadband networks we operate in Wellington that could be impacted by changes sought in the appeal.

We are companies who made joint submissions and further submissions about the subject matter of the proceedings. Since lodging the submission, Vodafone New Zealand Limited has rebranded to One New Zealand Group Limited (One NZ). Further, Fortysouth Group LP (Fortysouth) has recently acquired the fixed assets of One NZ (e.g. poles), whilst One NZ operates equipment on these assets such as antennas. Fortysouth are therefore joining these proceedings given the interest they now have in former One NZ assets.

We are not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.

We are directly affected by an effect of the subject of the appeal that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The parts of the proceedings we are interested in are Points 1-17 in the table of requested relief attached to the appeal. These matters address:

1. Changes sought to the general structure of the Infrastructure (INF) chapter and how it engages with other chapters and provisions of the Proposed Plan.
2. Changes to the INF objectives by either applying the objectives of other relevant chapters to all infrastructure provisions which currently don't apply, or alternatively including a comprehensive set of objectives in the INF chapter mirroring the objectives in other chapters that do not apply.
3. Deleting or amending Policy INF-P6.
4. Deleting clause 2 of Policy INF P12 (P13 in decision version).
5. Amending Rules INF R1, 2, 3, 4, 5 and 6 in regard to matters of discretion.

6. Apply the Coastal Environment (CE) Chapter to infrastructure in the Coastal Environment, or alternatively amend the INF-CE sub chapter such that it is no less stringent than the CE chapter.
7. Amend the INF-CE sub chapter introduction in regard to how other parts of the Proposed Plan apply.
8. Amend policies INF-CE-P16 (now P3), P18 (now P5), P19 (now P6), P21 (now P8), P22 (now P9) and P24 (now P11) to implement NZCPS Policy 13.
9. Changes to the INF-CE Rules in regard to setbacks from coastal margins.
10. Amend the INF-Ecosystems and Indigenous Biodiversity (ECO) sub chapter to give effect to Part 2 RMA, notably s6(c), s31 RMA, the NPSIB or the NZCPS.
11. Amend the INF-ECO subchapter introduction in regard to how other parts of the Proposed Plan apply.
12. Amend Policy ECO-P34 (now INF-ECO-P2) to reflect the NPSIB approach.
13. New INF-ECO Policy in regard to managing indigenous biodiversity outside SNAs.
14. Amendments to Rule INF-ECO-R41 (now INF-ECO-R1) in regard to operation, maintenance, repair and removal of existing infrastructure within a SNA.
15. Apply the Natural Features and Landscapes (NFL) Chapter to infrastructure, or alternatively, amend the INF-NFL sub chapter to ensure it is no less stringent than the general NFL chapter.
16. Amend the INF-NFL sub chapter introduction in regard to how other parts of the Proposed Plan apply.
17. Changes to the drafting of the INF-NFL policies.

We oppose the relief because it:

- a) will not promote the sustainable management of natural and physical resources within Wellington City, and is therefore inconsistent with Part 2 and other provisions of the RMA;
- b) will not meet the reasonably foreseeable needs of future generations;
- c) will not enable the social, economic and cultural wellbeing of the people of Wellington;
- d) will not facilitate the efficient use and development of natural and physical resources; and

- e) is not the most appropriate way to achieve the objectives of the Proposed Plan in terms of section 32 of the RMA.

In addition to the specific changes sought to provisions, a number of the appeal points seek quite fundamental change to how the provisions for infrastructure are currently structured which are designed to be relatively self-contained without need for reference to other chapters that do not have a bespoke framework for infrastructure. This relief would fundamentally change how the INF Chapter currently works with unknown consequences that may adversely affect the ability for necessary telecommunications infrastructure which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety, to be constructed, operated and maintained in Wellington City.

We agree to participate in mediation or other alternative dispute resolution of the proceedings.



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Signature of person wishing to be a party
(or person authorised to sign
on behalf of person wishing to be a party)

27 August 2025

Address for service of person wishing to be a party:

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