

Trevor Robinson  
Chair  
Hearings Panel  
Proposed Wellington District Plan

By email.

20 January 2023

Dear Commissioner

**APPLICATION FOR WAIVER – LATE FILING OF FURTHER SUBMISSIONS IN RELATION TO WELLINGTON PROPOSED DISTRICT PLAN**

On behalf of BARNZ, I make an application for waiver in relation to the late further submissions lodged by BARNZ on the Proposed Wellington District Plan.

The Board of Airline Representatives NZ Inc (BARNZ) is an incorporated society with membership comprising member airlines operating scheduled and code share international and domestic services throughout New Zealand, including at Wellington Airport. Members include Air New Zealand, Jetstar and Qantas.

The failure to file further submissions is an oversight on my part as I did not see the notification regarding the proposed district plan submission closing dates despite attempts to keep abreast of these via Westlaw. As I am based in Auckland, I was not as aware of the process as I would have been if in Wellington. I note that it has been an extraordinarily busy period for many resource management practitioners.

It was only after the further submission period had closed that I was alerted to the process and discovered that I had missed these, and as a result, not alerted my client to the closing dates.

In filing the late further submission on behalf of BARNZ, I have attempted to limit matters by only making a further submission on Wellington International Airport Limited's submissions (the Airport).

Although the interests of the Airport and BARNZ are generally aligned and it is likely that BARNZ will provide evidential support to the Airport where required, it is also important to ensure that the airlines have a voice in the development of the district plan that is independent of the Airport. For example, as airport costs are passed directly to the airlines and in turn onto airline passengers it is

appropriate to ensure that any potential increases in operational costs are separately and carefully scrutinised. Any amendments to the District Plan should accordingly be assessed from both perspectives.

I note that BARNZ made submissions on the draft Wellington District Plan.

I do not consider that any party will be prejudiced by the late inclusion of the further submissions as the potential outcomes are no different from the submissions that have already been filed and the hearings have not commenced. Conversely, for reasons explained above, airline passengers may benefit from BARNZ's involvement in the proposed district plan process.

Yours faithfully



**Gill Chappell**

