

Level 5
82 Willis Street

PO Box 9042
Wellington 6141
New Zealand

19 December 2014

The Chief Executive
Greater Wellington Regional Council
P O Box 11646
Wellington 6142

Attention: Sonia Baker
Team Leader - Environmental Regulation

Dear Sonia

Re: Resource Consent Applications - North Kumutoto Project – Request for Direct Referral to the Environment Court Pursuant to Section 87D, Resource Management Act 1991

Please find attached completed Form 7As requesting direct referral to the Environment Court of the following resource consent applications:

1. **Request 2** in relation to an application by Site 10 Redevelopment Limited Partnership for resource consents relating to the proposed five-level commercial building on Site 10 at North Kumutoto - Council reference WGN150102; and
2. **Request 4** in relation to an application by Wellington City Council for resource consents relating to the construction, maintenance and use of new and modified landscaped public open spaces and associated structures at North Kumutoto - Council reference WGN150103.

The requests are being made for the reasons stated in the attached Form 7As.

If you require any further information and/or clarification please do not hesitate to make contact and I will do my best to respond.

For your information, I can confirm that requests are also being made to the Wellington City Council for the direct referral of two applications to that Council for land use consents in relation to both the Site 10 building and the landscaped public open spaces.

Yours sincerely


Alistair Aburn
Environment and Resource Management Consultant
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REQUEST 2

REQUEST FOR APPLICATION RELATING TO RESOURCE CONSENT TO BE DETERMINED BY ENVIRONMENT COURT

(Form 7A – Section 87D, Resource Management Act 1991)

To: Greater Wellington Regional Council
PO Box 11646
WELLINGTON 6142

1 **Site 10 Redevelopment Limited Partnership** requests that you allow the following application lodged by it to be determined by the Environment Court instead of by you:

- application for resource consent (Council reference WGN150102).

2 The application requires resource consents for:

- (a) the diversion of and/or take of ground water during the construction of a new commercial building, including a basement level, on Site 10 (10 Waterloo Quay). Consent is required for a water permit for a Discretionary Activity under Rule 16 of the Regional Freshwater Plan; and
- (b) for the potential discharge of contaminants to land, including to the reticulated stormwater system; and for the potential discharge of contaminants to ground water during the construction of a new commercial building, including a basement level, on Site 10 (10 Waterloo Quay). Consent is required for a discharge permit for a Discretionary Activity under Rule 2 of the Regional Discharges to Land Plan and Rule 5 of the Regional Freshwater Plan.

3 The reasons for the request are as follows:

- (a) the project involves a development on Wellington's waterfront, which is an area of significance to the people of Wellington. The project is therefore of significant public interest and from the nature of submissions received is likely to be contentious; and
- (b) it will be more efficient in terms of cost and time for all parties and interested persons to have the matter referred directly to the Environment Court, as the matter may come before the Environment Court in any event through an appeal of any decision made by the Council.

DATED 19th December 2014

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Alistair Aburn
Environment and Resource Management Consultant
Urban Perspectives Ltd

For and on behalf of
Site 10 Redevelopment Limited Partnership

Address for Service:

Site 10 Redevelopment Limited Partnership
c/- Urban Perspectives Limited
P O Box 9042
Wellington

Attention: Alistair Aburn

Telephone: (04) 474 4111 (DDI)
Facsimile: (04) 499 9726
Email: alistair@urbanp.co.nz

Note to requester

If the consent authority determines that the application is incomplete, or if it receives the request after it has determined that the application will be not notified, or if it decides not to notify the application, it must return the request.

You may make this request only in the period starting on the day on which the application is made and ending 5 working days after the date on which the period for submissions on the application closes.



REQUEST 4

REQUEST FOR APPLICATION RELATING TO RESOURCE CONSENT TO BE DETERMINED BY ENVIRONMENT COURT

(Form 7A – Section 87D, Resource Management Act 1991)

To Greater Wellington Regional Council
Po BOX 11646
WELLINGTON 6142

1 **Wellington City Council** requests that you allow the following application lodged by it to be determined by the Environment Court instead of by you:

- application for resource consent (Council reference WGN150103).

2 The application requires resource consents for:

- (a) the occupation of structures associated with the proposed works in the coastal marine area. Consent is sought for a Controlled Activity under Rule 16 of the Regional Coastal Plan;
- (b) the construction, maintenance and use of new structures in the coastal marine area, and associated modification to the protected wharf edge and reclamation edge, at North Kumutoto within the Lambton Harbour Development Area (aka "Wellington Waterfront"). Consent is sought for a Discretionary Activity under Rule 25 of the Regional Coastal Plan; and
- (c) potential discharges to the coastal marine area during the construction of the public open spaces in and adjacent to the coastal marine area. Consent is for a Discretionary Activity under Rule 61 of the Regional Coastal Plan.

3 The reasons for the request are as follows:

- (a) the project involves a development on Wellington's waterfront, which is an area of significance to the people of Wellington. The project is therefore of significant public interest and from the nature of submissions received is likely to be contentious; and
- (b) it will be more efficient in terms of cost and time to all parties and interested persons to have the matter referred directly to the Environment Court, as the matter may come before the Environment Court in any event through an appeal of any decision made by the Council.

DATED 19th December 2014

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Alistair Aburn
Environment and Resource Management Consultant
Urban Perspectives Ltd

For and on behalf of
Wellington City Council

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