

**IN THE MATTER** of the Resource Management Act 1991

**AND** of an appeal under Clause 14(1) of First Schedule to the Resource Management Act 1991

**BETWEEN** LANDMATTERS LIMITED  
**Appellant**

**AND** GREATER WELLINGTON REGIONAL COUNCIL  
**Respondent**

**AND** CENTREPORT LIMITED  
**Interested Party**

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**NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS**  
**Section 274 of the First Schedule Resource Management Act 1991**

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**To:**

the Registrar  
Environment Court  
Wellington

1. Land Matters Ltd ("Land Matters") wish to be a party to the following proceedings:
  - *ENV-2019-WLG-000118;*
  - *CentrePort Limited v Greater Wellington Regional Council and the Proposed Natural Resources Plan*
2. We are —
  - *a person who has an interest in the proceedings that is greater than the interest that the general public has in that the subject matter in that the appellants notice of appeal could have an influence on the provisions of the Proposed District Plan that relate to land owned by the Interested Party.*
3. We are not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource

Management Act 1991.

4. We are interested in part of the proceedings.

5. The part of the proceedings I am interested in is:

- *See attached Appendix A*

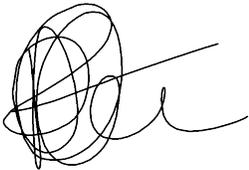
6. We are interested in the following particular issues:

- *See attached Appendix A*

7. We **oppose/support** the relief sought because—

- *See attached Appendix A*

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



Signature of person  
on behalf of Land Matters Ltd

8 October 2019

Date

Address for service of person wishing to be a party:

Telephone: 021 1704 787

Fax/email: [anna@landmatters.nz](mailto:anna@landmatters.nz)

Contact person: Anna Carter

<b>APPENDIX A</b>			
<b>Appellant: CentrePort Ltd</b>			
<b>Appeal points (the part of the appeal we are interested in)</b>	<b>Interested in the particular issues</b>	<b>We oppose/support the relief sought because</b>	<b>agree to participate in mediation or other ADR</b>
<p>Policy P28: Hazard mitigation measures</p> <p><i>Hard <u>hazard</u> engineering mitigation and protection methods shall be avoided except where it is necessary to protect existing development from unacceptable <u>hazard</u> risk, assessed using the risk-based approach, and;</i></p> <p><i><u>(a) any adverse effects are no more than minor, or</u></i></p> <p><i>(b) where the environmental effects are more than minor the works form part of a hazard risk management strategy.</i></p> <p><del><i>the works either form part of a hazard management strategy or the environmental effects are considered to be no more than minor.</i></del></p>	<p>Support Policy 28</p> <p><i>Hard hazard engineering mitigation and protection methods shall be avoided except where:</i></p> <p><i>(a) there is a functional or operational need to use hard hazard engineering mitigation and protection methods; or</i></p> <p><i>(b) it is necessary to protect existing and planned future development from unacceptable hazard risk, assessed using the risk-based approach and;</i></p> <p><i>(i) any adverse effects are no more than minor, or</i></p> <p><i>(ii) where the environmental effects are more than minor the works form part of a hazard risk management strategy.</i></p>	<p>We support in part the relief sought because:</p> <ul style="list-style-type: none"> <li>• We agree that hard engineering solutions are often only a practical method of hazard mitigation;</li> <li>• Hard engineering solutions can reduce the requirement for continuous intervention methods which may have a greater effect on the environment; and</li> <li>• <u>We support in part because the policy should also provide for future development as well as existing development.</u></li> </ul>	