

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 LAND MATTERS LIMITED
Appellant

AND GREATER WELLINGTON REGIONAL COUNCIL
Respondent

AND FEDERATED FARMERS OF NEW ZEALAND INC
Interested Party

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

To:

the Registrar
Environment Court
Wellington

1. Land Matters Ltd ("Land Matters") wish to be a party to the following proceedings:
 - *ENV-2019-WLG-000126;*
 - *Federated Farmers of New Zealand Inc 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: 021 877 143
Fax/email: bryce@landmatters.nz
Contact person: Bryce Holmes

APPENDIX A			
Appellant: Federated Farmers of New Zealand Inc			
Appeal points (the part of the appeal we are interested in)	Interested in the particular issues	We oppose/support the relief sought because	agree to participate in mediation or other adr
<p>Rule R108: Activities in natural wetlands and significant natural wetlands – non-complying activity The following activities, in a natural wetland or significant natural wetland except for those stipulated in and carried out in accordance with a wetland restoration management plan under Rule R106:</p> <p>(a) take, use, damming or diverting water into, within, or from the significant natural wetland, or the take and use of water within 50m of the significant natural wetland,</p> <p>(b) land disturbance including excavation and deposition,</p> <p>(c) reclamation (including and drainage or diverting of water to an extent that the area affected ceases to have the characteristics of a significant natural wetland), including any associated:</p> <p>(d) disturbance of a river or lake bed, or foreshore or seabed that forms part of a significant natural wetland, and</p> <p>(e) deposition in, on, or under a river or lake bed, or foreshore or seabed that forms part of a significant natural wetland, and</p> <p>(f) damage to a part of the foreshore or seabed that forms part of a significant natural wetland, and</p> <p>(g) diversion of water, and</p> <p>(h) discharge of sediment to water are non-complying activities.</p>	<p>Delete the amendment to Rule 108(a) which extends the rule to apply within 50m of a significant natural wetland</p>	<p>Support the relief in part sought because:</p> <ul style="list-style-type: none"> • There is insufficient evidence that supports this provision • It does not achieve the outcome sought by the NPS-FW and the RPS and is inconsistent with Section 6 of the RMA 	<p>Yes</p>
<p>Rule R110:</p> <p>Activities in outstanding natural wetlands – non-complying activities</p> <p>The following activities, in an outstanding natural wetland identified in Schedule A3 (outstanding wetlands), except for those stipulated in and carried out in accordance with a wetland restoration management plan under Rule R106:</p> <p>(a) the discharge of water or contaminants,</p>	<p>Amend the amendment to Rule 110(b) extending the rule to 50m of an outstanding natural wetland</p>	<p>Support the relief in part sought because:</p> <ul style="list-style-type: none"> • There is insufficient evidence that supports this provision • It does not achieve the outcome sought by the NPS-FW and the RPS and is inconsistent with Section 6 of the RMA 	<p>Yes</p>

<p><i>(b) take, use, damming or diverting water into, within, or from the wetland outstanding natural wetland, or the take and use of water within 50m of the outstanding natural wetland,</i></p> <p><i>(c) the placement of new structures with an area 10m² or greater for the purpose of hunting and recreation (including maimai and jetties), and all other structures,</i></p> <p><i>(d) land disturbance including excavation and deposition,</i></p> <p><i>(e) vegetation clearance, excluding the removal of pest plants under Rule R105,</i></p> <p><i>(f) other activities that are not discretionary under Rule R109 or prohibited by Rule R111 are non-complying activities.</i></p>			
<p>Schedule F3 -</p>	<p>Accurately map all significant natural wetlands using GIS so that these wetlands are able to be easily identified by plan users</p>	<p>We support because:</p> <ul style="list-style-type: none"> • It is the Regional Council's responsibility to map these sites • Accuracy is important especially where sites result in non-complying or prohibited activity status • The mapping should identify wetlands which meet the RPS Policy 23 criteria of significance 	