

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 MERIDIAN ENERGY LIMITED
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-000115;*
 - *Meridian Energy 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.

A handwritten signature in blue ink, appearing to be 'Bryce Holmes', is written on a light blue background.

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: Meridian Energy Ltd			
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>Policy 24 <u>Assessing</u> outstanding natural character</p> <p><i>Areas of outstanding natural character in the coastal marine area, lakes and rivers and their margins and natural wetlands, will be preserved by:</i></p> <p><u>(a) identifying areas of outstanding natural and high natural character within the region, and</u> <u>(b) avoiding adverse effects of activities on natural character in areas of the coastal marine area with outstanding natural character, and</u> <u>(c) avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on all other areas of natural character.</u> <u>(d) requiring use and development to be of a type, scale and intensity that will maintain the natural character values of the area, and</u> <u>(e) requiring built elements to be subservient to the dominance of the characteristics and qualities that make up the natural character values of the area, and</u> <u>(f) maintaining the high levels of naturalness of these areas, and</u> <u>(g) avoiding the adverse effects of activities, including those located outside the area, that individually or cumulatively detract from the natural character values of the outstanding natural character area.</u></p> <p>Note Method M24(b) applies to clause (a).</p>	<p>Amend Policy 24 as set out below and deleting Policy 25.</p> <p><i>P24</i> <i>Areas of outstanding natural character in the coastal marine area, lakes and rivers and their margins and natural wetlands, will be preserved and protected from inappropriate use and development by:</i></p> <p><i>(a) identifying areas of outstanding natural and high natural character within the region, and</i> <i>(b) avoiding adverse effects of activities on natural character in areas of the coastal marine area and coastal environment with outstanding natural character, and</i> <i>(c) avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on all other areas of natural character in the coastal environment, and</i> <i>(d) avoiding, remedying or mitigating other adverse effects of activities on all other areas of high natural character.</i> Note Method M24(b) applies to clause (a).</p>	<p>Support because:</p> <ul style="list-style-type: none"> The policy as proposed in the decision version goes beyond what is required by the NZCPS or section 6 of the RMA; Natural character should be protected from <i>inappropriate</i> subdivision, use and development. 	Yes

APPENDIX A			
Appellant: Meridian Energy Ltd			
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>Policy P48: Protection of outstanding natural features and landscapes</p> <p><i>The natural features and landscapes (including seascapes) of the coastal marine area, rivers, lakes and their margins and natural wetlands shall be protected from inappropriate use and development by:</i></p> <p>(a) <u>identifying outstanding natural features and landscapes within the region, and</u></p> <p>(b) (a) <i>avoiding adverse effects of activities on outstanding natural features and landscapes, and</i></p> <p>(c) (e) <i>avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on all other natural features and landscapes.</i></p> <p><u>Note Method M24(a) applies to clause (a).</u></p>	<p>Amend Policy 48 as follows:</p> <p>P48</p> <p><i>The natural features and landscapes (including seascapes) of the coastal marine area, rivers, lakes and their margins and natural wetlands shall be protected from inappropriate use and development by:</i></p> <p>(a) <i>identifying outstanding natural features and landscapes within the region, and (</i></p> <p><i>b) avoiding adverse effects of activities on outstanding natural features and landscapes in the <u>coastal marine area and coastal environment, and</u></i></p> <p>(c) <i>avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on all other natural features and landscapes <u>within the coastal environment, and</u></i></p> <p>(d) <u>avoiding, remedying or mitigating other adverse effects of activities on all other natural features and landscapes.</u></p> <p><u>Note Method M24(a) applies to clause (a).</u></p>	<p>Support in part because:</p> <ul style="list-style-type: none"> The proposed policy in the Decisions version goes beyond what is required under Section 6(b) of the RMA and the relevant provisions of the RPS which only requires the protection of <i>outstanding</i> natural features and landscape values from inappropriate subdivision, use or development and not all natural features and landscapes need to fall within this policy The policy could have unanticipated consequences which restrict appropriate activities and activities that may have a positive effect on the environment. 	Yes