

**BEFORE THE ENVIRONMENT COURT**

**ENV-2019-WLG-000131**

**AT WELLINGTON**

**I MUA I TE KOOTI TAIAO**

**TE WHANGANUI-A-TARA ROHE**

**UNDER** the Resource Management Act 1991

**AND**

**IN THE MATTER** of an appeal under Clause 14(1) of Schedule 1 to the Resource Management Act 1991

**BETWEEN** **NEW ZEALAND TRANSPORT AGENCY**

*Appellant*

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

*Respondent*

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**NOTICE OF QUEEN ELIZABETH THE SECOND NATIONAL TRUST'S  
WISH TO BE PARTY TO PROCEEDINGS**

9 October 2019

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**Counsel for Queen Elizabeth  
the Second National Trust:**

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**NOTICE OF QUEEN ELIZABETH THE SECOND NATIONAL TRUST'S  
WISH TO BE PARTY TO PROCEEDINGS**

**TO:**           The Registrar  
                  Environment Court  
                  WELLINGTON

1. Queen Elizabeth The Second National Trust (“QEII”) wishes to be a party to the following proceedings:
  - (a) An appeal by the New Zealand Transport Agency in relation to the Greater Wellington Regional Council’s decisions on submissions on the proposed Natural Resources Plan for the Wellington Region.
  
2. QEII is:
  - (a) A person who made a submission about the subject matter of the proceedings; and
  - (b) A person who has an interest in the proceedings that is greater than the interest that the general public has. The functions of the Trust are outlined in section 20(1) of the Queen Elizabeth II National Trust Act 1977 as being: “to encourage and promote, for the benefit and enjoyment of the present and future generations of the people of New Zealand, the provision, protection, preservation, and enhancement of open space.”
  
3. QEII is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (“RMA”).
  
4. QEII is interested in those parts of the proceedings that relate to the management of adverse effects on natural wetlands from subdivision and development in the catchments of the wetlands.
  
5. Accordingly, QEII is particularly interested in the parts of the proceedings relating to the following:
  - (a) Objectives O28 and O35;

(b) Policies P32, P39, P40, and P102; and

(c) Rules R52, R67, R99, R108, and R127.

6. QEII is interested in the following particular issues:

(a) Ensuring that Taupō Swamp is appropriately acknowledged as an Outstanding Natural Wetland and is suitably and adequately protected from the effects of inappropriate subdivision, use and development;

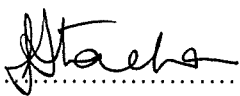
(b) Ensuring the Natural Resources Plan incorporates adequate provisions to ensure adverse effects on Taupō Swamp from subdivision, use and development in its catchment will be avoided;

(c) Ensuring the provisions of the Natural Resources Plan give effect to the Regional Policy Statement; and

(d) Ensuring the provisions of the Natural Resources Plan recognise and provide for the matters of national importance in sections 6(a), (b) and (c) of the RMA.

7. QEII conditionally opposes the relief sought because it does not consider that the amendments sought by the appellant will satisfactorily address the particular issues of interest to QEII.

8. QEII agrees to participate in mediation or other alternative dispute resolution of the proceedings.

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Jane Strachan

Solicitor

Acting pursuant to delegated authority on behalf of

**THE QUEEN ELIZABETH THE SECOND NATIONAL TRUST**

Dated the 9<sup>th</sup> day of October 2019

**Address for service of Appellant:**

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