

BEFORE THE ENVIRONMENT COURT  
AT WELLINGTON

ENV-2019-WLG-000201

I MUA I TE KOOTI TAIAO O AOTEAROA  
TE WHANGANUI-A-TARA

IN THE MATTER of the Resource Management Act 1991 (“**the Act**”)

A N D

IN THE MATTER of an appeal under Clause 14(1) of the First Schedule of the Act in relation to the proposed Natural Resource Plan for the Greater Wellington Region.

BETWEEN **CASTLEPOINT RESIDENTS AND RATEPAYERS ASSOCIATION**

*Appellants*

A N D **GREATER WELLINGTON REGIONAL COUNCIL**

*Respondent*

---

**NOTICE OF INTENTION TO APPEAR  
BY RANGITĀNE TŪ MAI RĀ TRUST AND RANGITĀNE O WAIRARAPA  
INCORPORATED SOCIETY**

**Dated 9 March 2020**

---

---

Counsel Acting  
**Aidan Warren**  
aidan.warren@mccawlewis.co.nz

Counsel Acting  
**Kuru Ketu**  
kuru.ketu@mccawlewis.co.nz

  
**McCaw Lewis**  
GOOD PEOPLE. GREAT LAWYERS.

LEVEL 6, 586 VICTORIA STREET, PO BOX 9348  
HAMILTON 3240, NEW ZEALAND  
DX GP 20020, PH 07 838 2079  
WWW.MCCAWLEWIS.CO.NZ

**To** the Registrar, Environment Court Wellington

**This notice, notifies you that:**

1. Pursuant to section 274 of the RMA, Rangitāne Tū Mai Rā Trust and Rangitāne o Wairarapa Incorporated Society (“Rangitāne”) file this Notice of Intention to Appear on the appeal by the Castlepoint Residents and Ratepayers Association (“the Appeal”).
2. Rangitāne are neutral to the Appeal.

**Grounds to be a section 274 Party**

3. The Appeal relates to various decisions on the provisions of the Greater Wellington Regional Council Proposed Natural Resource Plan (“the Decision”), that Rangitāne submitted on or have also appealed.
4. Rangitāne:
  - (a) Are the representative groups for the iwi of Rangitāne who have Mana Whenua in the Greater Wellington area;
  - (b) Are not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991;
  - (c) Made submissions on the proposed natural resource plan;
  - (d) Are interested in all of the matters raised in the appeal;
  - (e) Are an iwi that has an interest in the Decision that is greater than the interest that the general public has given their cultural and spiritual relationships within the Greater Wellington area; and
  - (f) Filed an appeal against the decision on 18 September 2019.
5. Specifically, Rangitāne are interested in the following appeal points and the relief now sought by the Castlepoint Residents and Ratepayer Association, as it differs from the submissions made by Rangitāne and parts of their appeal:

- (a) Policy 147;
  - (b) Policy 148
  - (c) Rule 196;
  - (d) Rule 198; and
  - (e) Schedule F2c.
6. The general relief sought by the Castlepoint Residents and Ratepayers Association seeks an exemption to allow recreational access onto the beach for vehicles, namely at the Basin/the Lagoon car park area only and Castlepoint Beaches not covered by the Masterton District Council By-law.

#### **Rangitāne Position**

7. As per the Rangitāne Deed of Settlement and Rangitāne Tū Mai Rā (Wairarapa Tamaki nui-ā-Rua) Claims Settlement Act 2017, Rangitāne have a cultural and historical association with the Mataikona (Castlepoint) area and have signed shared redress for this area (Overlay Classification for Castlepoint) that is yet to be enacted into legislation.
8. Rangitāne consider that, if the relief sought is granted, there may be an impact to the cultural value, significance and association Rangitāne place on the coastal area, various archaeological sites, coastal bird life, coastal habitats and other coastal sites.
9. Such relief may impact on Rangitāne.
10. Many of the activities that currently take place have had a significant effect on the coastal area, specifically motor vehicle use by the public. This has affected the coastal area and, in turn, its cultural value and significance.
11. Rangitāne seek to mitigate and, where appropriate, remove any further degradation to the coastal area.

## Conclusion

12. Rangitāne agree to participate in mediation or other alternative dispute resolution of the proceedings and will abide by any further directions of the Court.

Dated: 9 March 2020



---

**Aidan Warren/Kuru Ketu**  
Counsel for the Appellants

This document is filed by Aidan Warren of McCaw Lewis Lawyers. The address for service for Rangitāne is at the offices of McCaw Lewis Lawyers, Level 6, 586 Victoria Street, Hamilton 3240.

Documents for service may be left at the address for service, or may be:

- (a) Posted to Aidan Warren at PO Box 9348, Hamilton 3240; or
- (b) Emailed to Aidan Warren at [aidan.warren@mccawlewis.co.nz](mailto:aidan.warren@mccawlewis.co.nz) and [kuru.ketu@mccawlewis.co.nz](mailto:kuru.ketu@mccawlewis.co.nz).