

**BEFORE THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV-2024-WLG-000052

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

IN THE MATTER

**of an appeal under Clause 14 of
Schedule 1 of the Resource
Management Act 1991**

BETWEEN

**Waka Kotahi New Zealand Transport
Agency
Appellant**

AND

**Greater Wellington Regional Council
Respondent**

**NOTICE OF THE ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND
INCORPORATED'S WISH TO BECOME A PARTY TO PROCEEDINGS PURSUANT TO SECTION 274
RESOURCE MANAGEMENT ACT 1991**

Royal Forest & Bird Protection Society Inc

Solicitor Acting: May Downing/Erika Toleman


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**To: The Registrar
Environment Court
Wellington**

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated (**Forest & Bird** or **the Society**) wishes to be a party to the appeal by Waka Kotahi New Zealand Transport Agency (appellant) on Greater Wellington Regional Council's (**respondent**) decisions on the non-freshwater planning instrument parts of Proposed Change 1 and variation 1 to the Regional Policy Statement for the Wellington Region (**PC1**).
2. Forest & Bird made a submission and further submission on PC1.
3. Forest & Bird is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
4. Forest & Bird has an interest greater than the public generally as an incorporated society with a well-known role in the protection of indigenous biodiversity.¹
5. Forest & Bird is interested in all of the proceeding.
6. Forest & Bird **opposes** the relief sought in relation to all parts of the appeal because:
 - a. The changes sought seek to either delete or dilute Policy CC.1. Policy CC.1 is already broadly framed, providing for spectrum of ways in which greenhouse gas emissions will be reduced, and is complementary to existing legislative tools designed to address climate change.
 - b. Reducing greenhouse gas emissions is a critical part of resource management. The changes sought by the Appellant are inconsistent with the Resource Management Act, renders the mechanisms the Act provides to address climate change ineffective, and ultimately fails to ensure life-supporting capacity.
7. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 9 December 2024



M Downing / E Toleman
Counsel for the Royal Forest and Bird Protection Society of New Zealand Incorporated

¹ See *Marlborough District Council v Burkhardt Fisheries Ltd* [2018] NZEnvC 26 and [31]

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