

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
WELLINGTON REGISTRY**

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

**ENV-2024-WLG-000046**

**UNDER THE** Resource Management Act 1991

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

**BETWEEN** **WELLINGTON CITY COUNCIL**  
Appellant

**AND** **WELLINGTON REGIONAL COUNCIL**  
Respondent

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**NOTICE OF HUTT CITY COUNCIL'S WISH TO BE A SECTION 274 PARTY TO  
THE PROCEEDINGS**

9 December 2024

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**BUDDLEFINDLAY**  
Barristers and Solicitors  
Wellington

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**TO:** The Registrar  
Environment Court  
Wellington

1. Hutt City Council (**HCC**) wishes to be a party to the appeal proceedings lodged by Wellington City Council (**Appellant**) in respect of the decisions of Wellington Regional Council (**GWRC**) on Proposed Change 1 (**PC1**) (and Variation 1) to the Wellington Regional Policy Statement (**Decisions**).
2. HCC is a local authority. HCC also made a submission on PC1 dated 14 October 2022.
3. HCC is not a trade competitor for the purposes of sections 308C or 308CA of the Resource Management Act 1991 (**RMA**).
4. HCC is interested in all parts of the proceedings and the grounds and relief sought by the Appellant in its entirety.
5. HCC supports the grounds and all of the relief sought by the Appellant for the following reasons:
  - (a) the provisions in the Decisions Version that are subject to the appeal are unworkable, unclear, unnecessary and/or unachievable, including:
    - (i) in relation to the role of the RPS, and district plans, within the broader resource management system;
    - (ii) as they apply to individual resource consents and/or plan changes; and
    - (iii) because they contain:
      - (1) definitions that are unclear and/or overly restrictive;
      - (2) climate change policies that are unclear, unnecessary, unworkable, unduly onerous from a regulatory standpoint and/or contain unachievable timeframes; and
      - (3) unclear and/or overly restrictive policies relating to urban development and natural hazards<sup>1</sup>; and

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<sup>1</sup> Including Policies 29 and 51, noting HCC has sought different relief to that sought by the Appellant however the overall basis for the two appeals, in respect of those policies, aligns.

- (b) the provisions in the Decisions Version that are subject to the appeal may conflict with and/or duplicate higher order planning documents and/or national regulation; and
  - (c) the provisions in the Decisions Version that are subject to the appeal do not serve a resource management purpose, promote the sustainable management of natural and physical resources in accordance with section 5, further the principles of Part 2, or otherwise accord with the RMA.
6. HCC agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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**Thaddeus Ryan / Esther Bennett**  
Counsel for Hutt City Council

Dated: 9 December 2024

Address for service of person wishing to be a party:

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