

**BEFORE THE ENVIRONMENT COURT  
AT WELLINGTON.**

**Env-2019-WGN-**

**IN THE MATTER  
AND**

of the Resource Management Act 1991 (“Act”)

**IN THE MATTER**

of an appeal pursuant to clause 14(1) of the First Schedule  
of the Act in relation to the Proposed Natural Resources  
Plan for the Greater Wellington Regional Council

**BETWEEN**

**ANDREW & BRIDGET MATHEWSON**

Appellant

**AND**

**GREATER WELLINGTON REGIONAL COUNCIL**

Respondent

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**S274 RMA NOTICE OF APPEAL**

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Mr & Mrs A & B Mathewson  
Whakapuni Stn  
2409 White Rock Road  
Martinborough 5782  
Tel 06 307 8117  
Email [bridg.andy@gmail.com](mailto:bridg.andy@gmail.com)

TO The Registrar  
Environment Court  
Wellington.

FORM 33

1 We, Andrew Mathewson and Bridget Mathewson wish to be a party to the following proceedings and support the appellants Appeals to the Environment Court :

ENV-2019-WLG-000126 by Federated Farmers of New Zealand

ENV-2019-WLG-000133 by Beef and Lamb of New Zealand

of the proposed Natural Resources Plan for Greater Wellington.

2 We have an interest greater than the general public, because we farm livestock at Whakapuni Station in the South Wairarapa.

3 We are not\* a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.


4 We were aware of / involved in the Respondent GW's community consultation over the proposed Natural Resources Plan. Sheep were never discussed as animals to be excluded from wetlands or waterways. We believed there would be no additional vegetation or earthworks rules" after consultation.

We believe that Greater Wellington Regional Council's consultation was misleading in terms of caselaw and our written submission on the Draft Proposed Natural Resources Plan November 2014 should be treated as a submission.

5 We are interested in all of the proceedings

6 We especially oppose Landuse Rules 95-101 constraining Vegetation Removal, Earthworks and Livestock Grazing since over time these will force us to abandon livestock farming and amount to a substantial deprivation of our property rights in terms of the Supreme Court decision in *Waitakere City Council v Estate Homes Ltd* [2007] NZLR 149 at para 44 and following

7 We agree to participate in mediation or other alternative dispute resolution of the proceedings.

  
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B Mathewson

Signature of person wishing to be a party

Date 9 October 2019

Address for service of person wishing to be a party:

Mr & Mrs A & B Mathewson

Whakapuni Station

2409 White Rock Road

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