

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
AT WELLINGTON
I MUA I TE KŌTI TAIAO O AOTEAROA**

ENV-2019-WGN-

IN THE MATTER OF: An appeal under clause 14 of Schedule 1 of the Resource Management Act 1991

BETWEEN New Zealand Transport Agency

Appellant

AND Greater Wellington Regional Council

Respondent

Notice of Heritage New Zealand Pouhere Taonga's wish to be party to proceedings
Section 274 Resource Management Act 1991

Heritage New Zealand Pouhere Taonga
PO Box 2629
Wellington 6140
gbaumann@heritage.org.nz

NOTICE OF HERITAGE NEW ZEALAND POUHERE TAONGA'S WISH TO BE PARTY TO
PROCEEDINGS

Section 274 Resource Management Act 1991

To: The Registrar
Environment Court
Wellington

1. Heritage New Zealand Pouhere Taonga (Heritage New Zealand) wishes to be a party to the appeal by the New Zealand Transport Agency (NZTA) against a decision of Greater Wellington Regional Council on the Greater Wellington Proposed Natural Resources Plan (Proposed Natural Resources Plan).

Heritage New Zealand's interest in these proceedings

2. Heritage New Zealand is a person who made a submission about the subject matter of the proceedings.
3. Heritage New Zealand is a person who has an interest in the proceedings greater than the public generally in that Heritage New Zealand is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead historic heritage agency.
4. Heritage New Zealand Pouhere Taonga made a submission dated 23 September 2015 on the Greater Wellington Proposed Natural Resources Plan.
5. Heritage New Zealand is not a trade competitor the purposes of sections 308C or 308CA of the Resource Management Act 1991 (RMA).
6. Heritage New Zealand is interested in parts of the appeal and any further relief or consequential amendments relating to this.
7. Heritage New Zealand is interested in the parts of the proceedings relating to:
 - 7.1. Policies 4, 45, 138, 143, 144 of the Proposed Natural Resources Plan; and
 - 7.2. Rule 167 of the Proposed Natural Resources Plan
8. Heritage New Zealand opposes the relief sought because the amendments sought:
 - 8.1. Do not promote the sustainable management of natural and physical resources;
 - 8.2. Do not give effect to the matters of national importance in section 6 of the Resource Management Act 1991 and in particular sections 6(e) and 6(f);

- 8.3. Do not give effect to the relevant provisions of policy statements and plans, including the New Zealand Coastal Policy Statement 2010 (NZCPS) and the Greater Wellington Regional Policy Statement 2013;
- 8.4. Will not result in the most appropriate plan provisions in accordance with section 67 of the RMA; and
- 8.5. Is contrary to good resource management practice.

Mediation

9. Heritage New Zealand agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Signed for and on behalf of Heritage New Zealand Pouhere Taonga:



Rebecca Vertongen

Legal Advisor

7 October 2019