

**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

PAUL AND CHERRY CUTFIELD

Appellant

AND

**GREATER WELLINGTON REGIONAL
COUNCIL**

Respondent

S274 RMA NOTICE OF APPEAL

Mr & Mrs P & C Cutfield
Homeburn Stn
419 Kaiwaka Road
RD2 Martinborough 5782
Tel 06 3078818
Email <homeburn@farmside.co.nz>

Environment Court
Wellington.

1 We, Paul Cutfield and Cherry Cutfield 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 Homeburn 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.

Signature of person wishing to be a party

Date 9 October 2019

Address for service of person wishing to be a party:

Mr & Mrs P & C Cutfield
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