

BEFORE THE ENVIRONMENT COURT
AT WELLINGTON

ENV-2019-WLG-000122

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

IN THE MATTER of the Resource Management Act 1991 (“**the Act**”)

A N D

IN THE MATTER of an appeal under Clause 14(1) of the First Schedule of the Act in relation to the proposed Natural Resource Plan for the Greater Wellington Region.

BETWEEN **WELLINGTON FISH AND GAME ASSOCIATION**

Appellants

A N D **GREATER WELLINGTON REGIONAL COUNCIL**

Respondent

**NOTICE OF INTENTION TO APPEAR
BY RANGITĀNE TŪ MAI RĀ TRUST AND RANGITĀNE O WAIRARAPA
INCORPORATED SOCIETY
Dated 9 October 2019**

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To the Registrar, Environment Court Wellington

This notice, notifies you that:

1. Pursuant to section 274 of the RMA, Rangitāne Tū Mai Rā Trust and Rangitāne o Wairarapa Incorporated Society (“Rangitāne”) file this Notice of Intention to Appear on the appeal by the Wellington Fish and Game Association (“the Appeal”).
2. Rangitāne support the Appeal in part.

Grounds to be a section 274 Party

3. The Appeal relates to various decisions on the provisions of the Greater Wellington Regional Council Proposed Natural Resource Plan (“the Decision”), that Rangitāne submitted on or have also appealed.
4. Rangitāne:
 - (a) Are the representative groups for the iwi of Rangitāne who have Mana Whenua in the Greater Wellington area;
 - (b) Are not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991;
 - (c) Made submissions on the proposed natural resource plan;
 - (d) Are interested in all of the matters raised in the appeal;
 - (e) Are an iwi that has an interest in the Decision that is greater than the interest that the general public has given their cultural and spiritual relationships within the Greater Wellington area; and
 - (f) Filed an appeal against the decision on 18 September 2019.
5. Specifically, Rangitāne are interested in the following appeal points and the relief now sought as it is consistent with the matters Rangitāne made submissions on and sought similar relief for or seeks similar relief through the Rangitāne appeal. The relief sought will give better effect to the National Policy Statement for

Freshwater Management and the New Zealand Coastal Policy Statement as well as the RMA:

- (a) Definition of Good management practice;
- (b) Definition of Natural Character;
- (c) Objective O5: Fresh and coastal water;
- (d) Objective O19: Natural processes;
- (e) Objective O24: Contact recreation and Maori customary use;
- (f) Objective O25: Aquatic ecosystem health and mahinga kai;
- (g) Objective O28: Extent of wetlands;
- (h) Objective O31: Outstanding water bodies;
- (i) Objective O35: Significant indigenous biodiversity values;
- (j) Objective O44: Land use impacts on soil and water;
- (k) Objective O46: Discharges to land
- (l) Objective O47: Sediment runoff;
- (m) Policy P5: Review of existing consents;
- (n) Policy P31: Biodiversity, aquatic ecosystem health and mahinga kai;
- (o) Policy P38: Restoration of wetlands;
- (p) Policy P65: Minimising effects of rural land use activities;
- (q) New policies to manage cumulative effects of rural land use activities;
- (r) Policy P70: Managing point source discharges for aquatic ecosystem health and mahinga kai;
- (s) Policy P71: Quality of point source discharges to rivers;

- (t) Policy P99: Livestock access to a surface water body and the coastal marine area;
- (u) Policy P101: Management of riparian margins;
- (v) Policy P105: Protecting trout habitat;
- (w) Policy P111: Water takes at minimum flows and minimum water levels;
- (x) Policy P117: Supplementary allocation amounts at flows above the median flow;
- (y) Rule R.R1: Take and use of water in the Ruamahanga Whaitua - restricted discretionary activity;
- (z) New Policy in section 4.9 and whaitua chapters - end use of water;
- (aa) Policy R.P2: Core allocation in the Ruamahanga Whaitua;
- (bb) Rule R42: Minor discharges - permitted activity;
- (cc) Rule R97: Livestock access to a surface water body or the coastal marine area - permitted activity;
- (dd) Rule R99: Earthworks- permitted activity;
- (ee) Rule R100: Vegetation clearance on erosion prone land - permitted activity;
- (ff) Policy P102: Reclamation or drainage of the beds of lakes and rivers;
- (gg) Rule R104: Structures in significant natural wetlands - permitted activity;
and
- (hh) Rule R105: Planting and pest plant control in significant natural wetlands and outstanding natural wetlands - permitted activity.

Conclusion

6. Rangitāne agree to participate in mediation or other alternative dispute resolution of the proceedings and will abide by any further directions of the Court.

Dated: 9 October 2019



Aidan Warren/Kuru Ketu
Counsel for the Appellants

This document is filed by Aidan Warren of McCaw Lewis Lawyers. The address for service for Rangitāne is at the offices of McCaw Lewis Lawyers, Level 6, 586 Victoria Street, Hamilton 3240.

Documents for service may be left at the address for service, or may be:

- (a) Posted to Aidan Warren at PO Box 9348, Hamilton 3240; or
- (b) Emailed to Aidan Warren at aidan.warren@mccawlewis.co.nz and kuru.ketu@mccawlewis.co.nz.