

I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
TE WHANGANUI-A-TARA

BEFORE THE INDEPENDENT HEARING COMMISSIONERS
AT WELLINGTON

IN THE MATTER

of the Resource Management Act 1991
(RMA)

AND

IN THE MATTER OF

Plan Change 1 to the Natural Resources
Plan for the Wellington Region

MEMORANDUM ON BEHALF OF THE ROYAL FOREST AND BIRD PROTECTION
SOCIETY INC

HEARING STREAM 3
26 MAY 2025



Royal Forest and Bird Protection Society of New Zealand
Solicitors acting: M Downing
PO Box 631
Wellington
Ph 022 048 1970
m.downing@forestandbird.org.nz

MAY IT PLEASE THE COMMISSIONERS

1. Counsel for the Royal Forest & Bird Protection Society Inc (**Forest & Bird**) regrets to advise that it is no longer able to attend the HS3 hearings. This because of capacity and availability reasons, including Environment Court mediation scheduled during the same weeks.
2. Forest & Bird's position set out in its legal submissions dated 9 May 2025 has not changed after considering Greater Wellington Regional Council's rebuttal evidence on Rural Land Use and Earthworks. Forest & Bird maintains the concerns raised in its legal submissions.
3. Counsel is happy to provide written answers to any questions the Commissioners may have.

Dated this 26th day of May 2026



May Downing

Counsel for the Royal Forest and Bird Protection Society Inc