

**BEFORE THE ENVIRONMENT COURT  
WELLINGTON REGISTRY**

**ENV-2024-WLG-000054**

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

**IN THE MATTER**

**of an appeal under Clause 14 of  
Schedule 1 of the Resource  
Management Act 1991**

**BETWEEN**

**Kāpiti Coast District Council  
Appellant**

**AND**

**Greater Wellington Regional Council  
Respondent**

**NOTICE OF THE ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND  
INCORPORATED'S WISH TO BECOME A PARTY TO PROCEEDINGS PURSUANT TO SECTION 274  
RESOURCE MANAGEMENT ACT 1991**

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**Royal Forest & Bird Protection Society Inc**

Solicitor Acting: May Downing/Erika Toleman

E: [m.downing@forestandbird.org.nz](mailto:m.downing@forestandbird.org.nz) / [e.toleman@forestandbird.org.nz](mailto:e.toleman@forestandbird.org.nz)

Ph: 022 048 1970 / 021 988 315

**To: The Registrar  
Environment Court  
Wellington**

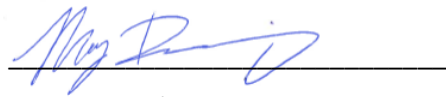
1. The Royal Forest and Bird Protection Society of New Zealand Incorporated (**Forest & Bird** or **the Society**) wishes to be a party to the appeal by Kāpiti Coast District Council (Appellant) on Greater Wellington Regional Council's (**respondent**) decisions on the non-freshwater planning instrument parts of Proposed Change 1 and variation 1 to the Regional Policy Statement for the Wellington Region (**PC1**).
2. Forest & Bird made a submission and further submission on PC1.
3. Forest & Bird is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
4. Forest & bird has an interest greater than the public generally as an incorporated society with a well-known role in the protection of indigenous biodiversity.<sup>1</sup>
5. Forest & Bird is interested in all of the proceeding other than the definitions for "medium density development", Policy 30, and Policy 57.
6. The Appellant's relief is wide-ranging and interconnected. Forest & Bird is interested in and **opposes** the relief sought where the Appellant seeks changes that:
  - a. Do not safeguard the life-supporting capacity of air, water, soil, and ecosystems;
  - b. Do not accord with the provision of Part 2 of the Resource Management Act;
  - c. Renders the mechanisms provided under the Resource Management Act to address climate change ineffective;
  - d. Fail to give effect to relevant national policy statements; and
  - e. Do not achieve the objectives of the Regional Policy Statement for the Wellington Region and/or purpose of the Resource Management as required by section 32.

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<sup>1</sup> See *Marlborough District Council v Burkhardt Fisheries Ltd* [2018] NZEnvC 26 and [31]

7. Forest & Bird signals a particular interest in the relief in relation to the Indigenous Ecosystems Chapter, particularly where it may conflict with provisions supporting greater ecological protection or where Forest & Bird has sought relief seeking clearer environmental bottom lines.
  
8. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 9 December 2024



M Downing / E Toleman  
Counsel for the Royal Forest and Bird Protection Society of New Zealand Incorporated

**Address for Service**

May Downing / Erika Toleman  
PO Box 631, Wellington

Telephone: 022 048 1970 / 021 988 315

E-mail: [m.downing@forestandbird.org.nz](mailto:m.downing@forestandbird.org.nz) / [e.toleman@forestandbird.org](mailto:e.toleman@forestandbird.org)