

**BEFORE THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV-2024-WLG-000046

**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

**Wellington City 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**

Royal Forest & Bird Protection Society Inc

Solicitor Acting: May Downing/Erika Toleman

E: m.downing@forestandbird.org.nz / e.toleman@forestandbird.org.nz

Ph: 022 048 1970 / 021 988 315

**To: The Registrar
Environment Court
Wellington**

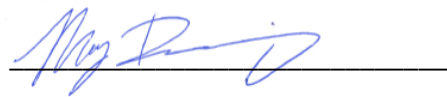
1. The Royal Forest and Bird Protection Society of New Zealand Incorporated (**Forest & Bird** or **the Society**) wishes to be a party to the appeal by Wellington City Council (Appellant) on Greater Wellington Regional Council's (**respondent**) decisions on the non-freshwater planning instrument parts 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.¹
5. Forest & Bird is interested in all of the proceeding other than Policy UD.3 and the definitions for "high density development" and "medium density development".
6. Forest & Bird **opposes** the relief sought because:
 - a. The relief sought is not consistent with the Resource Management Act or relevant national direction and will not ensure that ecosystems are safeguarded.
 - b. The changes sought seek to either delete or dilute provisions that help to achieve a significant reduction in greenhouse gas emissions and improve the resilience of the Wellington Region to the effects of climate change. The relevant provisions are already broadly framed, providing for spectrum of ways in which they will be achieved, and are complementary to existing legislative tools designed to address climate change such as the Climate Change Response Act 2002.
 - c. The dual tasks of reducing greenhouse gas emissions and improving resilience to climate change are fast becoming a critical part of resource management. The

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

changes sought by the Appellant are inconsistent with the Resource Management Act, renders the mechanisms the Act provides to address climate change ineffective, and ultimately fail to ensure life-supporting capacity.

7. 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 / e.toleman@forestandbird.org