

**IN THE ENVIRONMENT COURT
AT WELLINGTON
TE KŌTI TAIAO O AOTEAROA**

ENV-2024-WLG-000046

IN THE MATTER the Resource Management Act 1991

AND

IN THE MATTER OF An appeal under clause 14(1) of Schedule 1 of the
Resource Management Act 1991

BETWEEN **WELLINGTON CITY COUNCIL**

 Appellant

AND **WELLINGTON REGIONAL COUNCIL**

 Respondent

**NOTICE OF INTENTION TO BE A PARTY TO PROCEEDINGS UNDER
SECTION 274 ON BEHALF OF GUILDFORD TIMBER COMPANY LIMITED**

9 December 2024

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To the Registrar
Environment Court
Wellington

**NOTICE OF INTENTION TO BE A PARTY TO PROCEEDINGS
UNDER SECTION 274 OF THE RESOURCE MANAGEMENT ACT
1991**

1. The Guildford Timber Company Limited (**GTC**) wish to be a party to the following proceedings:
 - a) Wellington City Council's (**WCC**) appeal against the decision of the Wellington Regional Council on proposed Plan Change 1 to the Wellington Regional Policy Statement.
2. GTC has an interest in the proceedings that is greater than the interest that the general public has as it owns a large greenfield site (330ha) in Upper Hutt much of which is currently in commercial forestry known as the Southern Growth Area and has prepared a Masterplan for the development of its land for residential and mixed used development. The Southern Growth Area is affected by the provisions of proposed Plan Change 1. The GTC land had previously been identified as a Future Grown Area in the Wellington Regional Council's Future Development Strategy (FDS). GTC's land has subsequently been left out of the recent FDS. Development of the Southern Growth Area for up to 2040 residential homes is listed as a project under the Fast Track Approvals and GTC has sought to rezone its land via submission on UHCC Proposed Plan Change 50. Development of GTC's land will be directly affected by the provisions of RPS-0PC1 including policy shifts in management of significant, indigenous biodiversity, Greenfield development, transport, stormwater and forestry in the region.
3. GTC is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
4. GTC is directly affected by an effect of the subject of the appeal that—
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
5. GTC is interested in part of the proceedings. The part of the proceedings GTC is interested in is:
 - a) Policy 51
 - b) Policy 55
 - c) Policy 56

- d) Policy 57
 - e) Policy 58
 - f) Policy UD.3
 - g) Policy UD.4
 - h) Policy UD.5
 - i) Policy CC.2 and CC.2A
6. GTC is interested in the following particular issues addressed in the appeal that would result in changes to the RPS-PC1 that would:
- a) Properly recognises the importance and benefits to the region of appropriately located and well-designed greenfield housing development to achieve well-functioning urban development and rural areas;
 - b) Provides policy support for greenfield development that contributes to well-functioning urban development and rural areas;
 - c) Introduces policy that gives effect to the NPS-FM and NPS-UD in a more balanced way than the notified version of PC1;
 - d) Does not include unduly restrictive references to compact urban form that would limit greenfield development, including integrating land use and transportation.
7. GTC **supports** the requested relief sought by WCC's appeal in relation the following specific provisions:
- a) Amendments to Policy 51 to ensure greater pathways to enable development in areas at high risk of natural hazards while managing risk, and deletion of the requirement for policy to be given consideration at the resource consent processing level;
 - b) Amendments to Policy 55 to ensure it does not constrain future development options which will affect housing affordability, is clear, and deletion of the requirement for policy to be given consideration at the resource consent processing level;
 - c) Amendments to Policy 56 to ensure it does not constrain future development options which will affect housing affordability, is clear, and deletion of the requirement for policy to be given consideration at the resource consent processing level;
 - d) Amendments to Policy 57 to ensure it is not overly prescriptive in directing development to be located in areas near centres, and deletion of the requirement for policy to be given consideration at the resource consent processing level;
 - e) Amendments to the Explanation to Policy 58 to delete the requirement for policy to be given consideration at the resource consent processing level;
 - f) Amendments to Policy UD.3 to ensure to ensure it does not constrain future development options which will affect housing affordability, is clear, and deletion of the requirement for policy to be given consideration at the resource consent processing level;
 - g) Deletion of Policy UD.4 or amend to ensure it does not constrain future development options which will affect housing affordability, is clear, and deletion of the requirement for policy to be given consideration at the resource consent processing level;

- h) Amendments to Policy UD.5 to ensure it is clear, and deletion of the requirement for policy to be given consideration at the resource consent processing level;
 - i) Deletion of Policies CC.2 and CC.2A.
8. GTC agree to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 9 December 2024



Andrew Beatson

Counsel for Guildford Timber Company Limited, person authorised to sign on behalf of person wishing to be a party

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Documents for service on the person wishing to be a party may be left at that address for service or may be emailed to counsel at andrew@beatson.co.nz.