

**BEFORE THE ENVIRONMENT COURT  
AT WELLINGTON**

**ENV-2020-WLG-014**

**I TE KŌTI TAIAO  
TE WHANGANUI-Ā-TARA ROHE**

**IN THE MATTER** of a direct referral under s87G of the Resource  
Management Act 1991

**BETWEEN** **NEW ZEALAND TRANSPORT AGENCY**  
  
Applicant

**AND** **MANAWATŪ-WHANGANUI REGIONAL COUNCIL**  
  
Regulatory Authority

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**SECTION 274 NOTICE BY THE ROYAL FOREST AND BIRD PROTECTION SOCIETY  
OF NEW ZEALAND INCORPORATED**

17 June 2020

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Royal Forest and Bird Protection Society of New Zealand Inc.  
PO Box 2516  
Christchurch 8140  
Ph 03 9405524  
Solicitor acting: Peter Anderson/Erika Toleman

To: The Registrar  
Environment Court  
Wellington

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated ("Forest and Bird") wishes to be a party to the following proceedings:

Waka Kotahi NZ Transport Agency v Manawatū-Whanganui Regional Council ENV-2020-WLG-014

2. Forest and Bird:
  - a. made a submission on the application; and
  - b. has an interest greater than the public generally as an incorporated society with a well known role in the protection of indigenous biodiversity (see *Marlborough District Council v Burkhart Fisheries Ltd* [2018] NZEnvC 26 at [31]).
3. Forest and Bird is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991.
4. Forest and Bird is interested in all of the proceedings.
5. Forest and Bird opposes the relief sought by the applicant, for the reasons set out in its submission on the resource consent application, dated 24 April 2020. Counsel understands this submission has already been filed with the Court by the applicant.
6. Forest and Bird agrees to participate in mediation or other alternative dispute resolution of the proceedings.

17 June 2020



Erika Toleman  
Counsel for Royal Forest and Bird Protection Society of New Zealand Inc.