

**BEFORE THE ENVIRONMENT COURT / I MUA I TE KOOTI TAIAO O
AOTEAROA**

AT AUCKLAND

UNDER the Resource Management Act 1991

A N D

IN THE MATTER of an appeal under clause 14 of Schedule 1 of the Act

BETWEEN **WAIKATO AND WAIPA RIVER IWI**

(ENV - 2020 - AKL - 000100)

Appellant

WAIKATO REGIONAL COUNCIL

Respondent

**NOTICE OF WAIRAKEI PASTORAL LIMITED'S
WISH TO BE PARTY TO APPEAL**

29 SEPTEMBER 2020

Counsel instructed:
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SECTION 274 NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS BEFORE THE ENVIRONMENT COURT

**TO: THE REGISTRAR
ENVIRONMENT COURT
AUCKLAND**

WAIRAKEI PASTORAL LIMITED (WPL) wish to be a party to the appeal by the Waikato and Waipa River Iwi against a decision of the Respondent on Proposed Plan Change 1: Waikato and Waipa River Catchments to the Waikato Regional Plan as amended by Variation 1 (**PC1**).

WPL:

1. Made a submission on PC1 in 2016;
2. Made a submission on Variation 1 to PC1 in 2018;
3. Made a further submission on PC1 as amended by Variation 1 in 2018; and
4. Lodged an appeal on PC1 on 8 July 2020.

WPL is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**Act**).

WPL is interested in the parts of the appeal relating to:

1. Policy 2
2. Policy 4
3. Rule 4.3
4. Rule 4.4
5. Rule 4.5
6. Rule 4.6
7. Rule 4.7

8. Rule 4.8
9. Schedule D1
10. Schedule D2
11. Table 3.11.1
12. Table 3.11.2
13. Table 3.11.3

WPL supports the relief sought in relation to Policy 2 and Policy 4 and agrees with the reasons set out in the appeal.

WPL opposes the “recalibration” of Rule 4.3, which is in direct conflict with the relief sought in the WPL appeal, for the reasons set out in the WPL appeal.

WPL opposes the new conditions sought to be introduced to Rules 4.4, 4.5, 4.6, 4.7 and 4.8 on the basis that the concepts, while supported, cannot be imposed as plan standards to be met.

WPL supports the relief sought in relation to Schedules D1 and D2 as it agrees with the reasons set out in the appeal.

WPL is opposed to the vague and unspecified relief sought in relation to Table 3.11.1.

WPL opposes the request to expand the scope and role of Table 3.11.2 to identify “relative reductions” and “relative improvements” on the basis that Table 3.11.1 clearly and appropriately establishes the improvements required in each sub-catchment.

WPL supports in part the request to review the prioritisation order in Table 3.11.1 and agrees with the reasons set out in the appeal.

WPL agrees to participate in mediation or other alternative dispute resolution of the proceedings.

WAIRAKEI PASTORAL LIMITED, by its counsel:



Signature:
Date:

B S Carruthers
29 September 2020

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TO:

Registrar, Environment Court, Auckland

AND TO:

The Respondent