

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

ENV-2024-WLG-000048

IN THE MATTER

An appeal under Schedule 1 of the Resource Management Act 1991 to Greater Wellington Regional Councils Regional Policy Statement Change 1.

BETWEEN

UPPER HUTT CITY COUNCIL

Appellant

AND

**GREATER WELLINGTON REGIONAL
COUNCIL**

Respondent

**NOTICE OF INTENTION TO BE A PARTY TO PROCEEDINGS UNDER
SECTION 274 ON BEHALF OF WAIKANAЕ NORTH DEVELOPMENTS
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**

1. Waikanae North Developments Limited (**WNDL**) wishes to be a party to the following proceeding:
 - a) Upper Hutt City Council's (**HCC**) appeal against the decision of the Wellington Regional Council on proposed Plan Change 1 to the Wellington Regional Policy Statement.
2. WNDL made a submission and further submission on Change 1.
3. WNDL has an interest in the proceedings that is greater than the interest that the general public has. WNDL is a land developer and owns a large greenfields site at Waikanae. The WNDL site has been identified as a high priority development and is a listed project under the Fast Track Approvals Bill. It is a regionally significant land development project. The WNDL site is affected by the provisions of proposed Plan Change 1.
4. WNDL is not a trade competitor for the purposes of section 308 of the Resource Management Act 1991.
5. WNDL is interested in **part** of the proceeding. The parts of the proceedings GTC is interested in are:
 - (a) The definitions '*Ecosystem processes*' and '*Environmentally responsive*'
 - (b) Policy 51
 - (c) Policy 55
 - (d) Policy 56
 - (e) Policy 57
 - (f) Policy 58
 - (g) Policy UD.3

- (h) Policy UD.4
- (i) Policy UD.5
- (j) Policy CC.2 and
- (k) CC.2A

6. In particular, WNDL is interested in any aspects of the appeal that could result in changes to the RPS- PC1 that assist to ensure that PC-1 (and the RPS):

- (a) properly recognises the importance and benefits of appropriately located and well-designed greenfield housing developments;
- (b) provides policy support for greenfield housing in the region;
- (c) ensures that land that is suitable for greenfield housing development is not sterilised as a result of the Policy framework implemented through RPS-PC-1;
- (d) introduces policy that gives effect to NPS-FM and NPS-UD in a more balanced way than the notified version, by ensuring that it gives appropriate recognition to the use as well as to the protection elements of National Directions;
- (e) does not overreach by attempting to manage the effects of climate through planning instruments in a manner that fails to adequately recognise and provide for the benefits of greenfield housing and other development and which does not properly recognise the relative efficiency of other policy, statutory and economic levers to manage greenhouse gas emissions, rather than attempting to manage these effects indirectly and inefficiently by restricting greenfield housing opportunities and other activities; and
- (f) avoids unnecessary duplication or repetition.

7. WNDL **supports** in part and **opposes in part** the requested relief sought by UHCC's appeal.
8. WNDL agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 8 December 2024.



A Beatson

For Waikanae North Developments Limited

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