

**BEFORE THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV-2018-WLG-000012

IN THE MATTER OF

Resource Management Act
1991

AND IN THE MATTER OF

An appeal against the
decision of Kapiti Coast
District Council in respect of
the Proposed Kapiti Coast
District Plan

BETWEEN

**FEDERATED FARMERS OF
NEW ZEALAND
INCORPORATED**

Appellant

AND

**KAPITI COAST DISTRICT
COUNCIL**

Respondent

SECTION 274 NOTICE

Royal Forest and Bird Protection Society
of New Zealand Inc.
PO Box 631
Wellington 6140
Ph 021 988315
Solicitor acting: Erika Toleman
e.toleman@forestandbird.org.nz

SECTION 274 NOTICE

To: The Registrar
Environment Court
Wellington

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated ('Forest and Bird') wish to be a party to the appeal by Federated Farmers of New Zealand Incorporated in respect of the Kapiti Coast District Council's decision on the Kapiti Coast District Plan.
2. Forest and Bird:
 - a. made a submission on the matters included in this appeal; and/or
 - b. has an interest greater than the public generally by virtue of being:
 - i. New Zealand's largest nature conservation non-government organisation with more than 70,000 members and supporters; and
 - ii. active in RMA processes for many years to achieve improved outcomes for nature conservation.
3. Forest and Bird is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
4. Forest and Bird is interested in the following matters appealed by Federated Farmers:
 - a. Definitions of:
 - i. Earthworks
 - ii. Farming
 - b. Rule 3A.1.4
 - c. Rule 3A.3.8
 - d. Rule 3A.1.6
 - e. Schedule 3.2 and Rules pertaining to Key Indigenous Tree Species.
5. Forest and Bird oppose the relief sought by Federated Farmers in its appeal on the grounds the relief sought is:
 - a. not in accordance with sound resource management practices; and
 - b. inconsistent with Part 2 of the Resource Management Act 1991.

6. Forest and Bird agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 14 February 2018



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

Address for service:

Royal Forest & Bird Protection Society of NZ Inc.
PO Box 641
Wellington 6140
Attn: Erika Toleman
e.toleman@forestandbird.org.nz
021 988 315