

**Before the Environment Court  
At Wellington  
ENV-2018-WLG-000018**

**Under** Clause 14 of the First Schedule to the Resource  
Management Act 1991

**Between** **Winstone Aggregates (A division of Fletcher Concrete  
and Infrastructure Limited)**

**Appellant**

**And** **Kapiti Coast District Council**

**Respondent**

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**Notice of intention of Wellington Regional Council to become a party  
pursuant to section 274 of the Resource Management Act 1991**

**Date:** 16 February 2018

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Solicitor on the record

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**To** The Registrar  
Environment Court  
WELLINGTON

1 Wellington Regional Council (**WRC**) wishes to become a party to the appeal by Winstone Aggregates (A division of Fletcher Concrete and Infrastructure Limited) (**Winstone**) against the decisions made by the Kapiti Coast District Council (**KCDC**) on the proposed Kapiti Coast District Plan (**the Decisions**).

2 WRC is a local authority under the Resource Management Act 1991 (**RMA**) and it made submissions on the subject matter of these proceedings.

3 WRC is not a trade competitor for the purposes of section 308C or 308CA of the RMA.

### **Proceedings**

4 WRC is interested in all of the proceedings.

5 In particular, WRC is interested in the following issues:

5.1 The management of extraction of aggregates and minerals to enable the sustainable development of the region and provide for the environmental, social, economic and cultural wellbeing of communities.

5.2 The need to manage extraction appropriately to reduce adverse effects on environmental and amenity values,

including extraction in hazard areas, such as the river corridor.

5.3 The effect of heavy vehicle movements associated with gravel extraction on the operation and safety of the transport network.

5.4 Consistency of the provisions in the Decisions with the higher order documents and the RMA.

**Position on the relief sought**

6 WRC opposes the relief sought in the notice of appeal for the following reasons:

6.1 The extraction of aggregate resources for beneficial purposes is supported, provided that adverse effects are managed and the regulatory regime is appropriate. Any changes to that regulatory regime needs to be assessed appropriately.

6.2 A Quarry Zone which includes the river corridor does not allow for effective river and flood hazard management.

6.3 It is appropriate to control the extraction of both river gravels in channel and in the river corridor for effects on river and hazard management and flood protection and the proposed changes to permitted activity status rules by the appellant do not allow for those effects to be assessed.

6.4 The relief seeks to delete the requirement for a traffic assessment for any new activity that will generate vehicle movements over the threshold in the proposed Plan. Requiring an assessment as to whether traffic generated by a proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network is an appropriate method of integrating the effects of land use on the transport network.

### **Mediation**

7 WRC agrees to participate in mediation or other alternative dispute resolution in the proceedings.

**Date:** 16 February 2018



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Kerry Anderson  
Counsel for the Wellington Regional  
Council

This document is filed by Kerry Anderson of DLA Piper New Zealand, solicitor for the Wellington Regional Council.

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- left at the above address for service, or
- posted to the solicitor at PO Box 2791, Wellington 6140, or
- transmitted to the solicitor by fax on +64 4 472 7429.

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