

**IN THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV- 2025-WLG-000035

**I MUA I TE KOOTI TAIAO O AOTEAROA
WHANGANUI-A-TARA ROHE**

IN THE MATTER

of an appeal under Clause 14 of the First
Schedule of the Resource Management
Act 1991

AND IN THE MATTER

of the proposed Wairarapa Combined
District Plan

BETWEEN

**FEDERATED FARMERS OF NEW ZEALAND
INCORPORATED
Appellant**

AND

**CARTERTON, MASTERTON, AND SOUTH
WAIRARAPA DISTRICT COUNCILS
Respondent**

**NOTICE OF INTENTION BY ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW
ZEALAND INCORPORATED TO BE A PARTY**

12 December 2025

To: The Registrar
Environment Court
Wellington

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

Federated Farmers of New Zealand Incorporated v Carterton, Masterton, and South Wairarapa District Councils ENV-2025-WLG -35.

2. Forest & Bird made a submission and further submission on the matters included in the appeal.
3. Forest & Bird also has an interest greater than the public generally by virtue of being:
 - a. New Zealand's largest nature conservation non-government organisation with more than 70,000 members and supporters; and
 - b. active in RMA processes for many years to achieve improved outcomes for nature conservation.
4. The Environment Court has accepted Forest & Bird's interest as being greater than the public generally for the purposes of s274, in that it is 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 [30]).
5. Forest & Bird is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
6. Forest & Bird is interested in the relief sought with respect to: Objectives RE-O4, NH-O2, ECO-O1, NFL-O2 and PA-O1; Policies ECO-P3, ECO-P4, ECO-P5, ECO-P8, NFL-P2, NFL-P3, NFL-P4 and PA-P2; and Rules NH-R1, ECO-R1; Standards NFL-S1, NFL-S2, NFL-S3 and CE-S1 – 3; and the definitions of "ancillary rural earthworks" and "surface water body", discussed in Appendix 1 of the appeal.
7. Forest & Bird opposes that relief as it:
 - a. is inconsistent with part 2 of the RMA;

- b. is inconsistent with the Council's function under 31(1)(b)(iii) to control the effects of the use of land for the purpose of the maintenance of indigenous biodiversity;
 - c. does not give effect to higher order planning instruments;
 - d. does not represent best resource management practice; or
 - e. any combination of the above matters.
8. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 12 December 2025



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