
**IN THE ENVIRONMENT COURT
AT WELLINGTON**

**I TE KŌTI TAIAO O AOTEAROA
KI TE WHANGANUI-A-TARA ROHE**

ENV-2024-WLG-00036

IN THE MATTER OF of the Resource Management Act 1991
(the Act)

AND IN THE MATTER OF an appeal under clause 14(1) of the First
Schedule to the Act

BETWEEN FONTERRA LIMITED

Appellant

AND MANAWATŪ-WHANGANUI REGIONAL
COUNCIL

Respondent

**NOTICE OF THE MINISTER OF DEFENCE'S WISH TO BE A PARTY TO AN APPEAL BY
FONTERRA LIMITED**

13 September 2024

CROWN LAW
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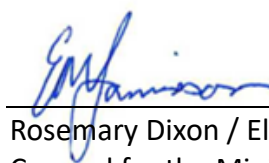
TO: The Registrar
Environment Court
Wellington

INTRODUCTION

1. The **MINISTER OF DEFENCE** (the **Minister**) gives notice under section 274 of the Act that she wishes to be a party to Fonterra Limited's appeal on the Manawatū-Whanganui Regional Council's decisions on Proposed Plan Change 3 (Urban Development) to the Regional Policy Statement component of the Manawatū-Whanganui One Plan (**Proposed PC3**),.
2. The Minister made a submission on Proposed PC3 about the subject matter of the appeal.
3. The Minister is not a trade competitor for the purposes of section 308D of the Act.
4. The Minister has an in interest in all of the proceedings being:
 - 4.1 Objective UFD-O3; and
 - 4.2 Policy UFD-P4.
5. The Minister supports in part/opposes in part the relief sought:
 - 5.1 The Minister supports in part/opposes in part the proposed relief relating to UFD-O3 (1)(f).
 - 5.1.1 The Minister supports the relief that seeks to avoid rather than manage reverse sensitivity effects on the operation, maintenance and upgrade of infrastructure of national and regional importance.
 - 5.1.2 The Minister opposes the qualification "as far as reasonably practicable" as this would provide insufficient protection for defence facilities from reverse sensitivity effects.

- 5.2 The Minister supports in part/opposes in part the proposed relief relating to UFD-P4(2)(d).
- 5.2.1 The Minister supports the relief that seeks to avoid rather than manage reverse sensitivity effects.
- 5.2.2 The Minister opposes the addition of the qualification “as far as reasonably practicable and otherwise mitigates any potential or actual” reverse sensitivity effects as this would provide insufficient protection for defence facilities from reverse sensitivity effects.
6. The Minister agrees to participate in mediation or other alternative dispute resolution of the proceedings.

13 September 2024



Rosemary Dixon / Eleanor Jamieson
Counsel for the Minister of Defence