

**Before the Environment Court
At Wellington
I Mua I te Kōti Taiao
Te Whanganui-a-Tara Rohe
ENV-2024-WLG-00036**

Under the Resource Management Act 1991 (**Act**)

In the matter of an appeal under Clause 14(1) of Schedule 1 of the Act

Between **Fonterra Limited**
Appellant

And **Manawatū-Whanganui Regional Council**
Respondent

Notice of Palmerston North City Council's wish to be party to proceedings

Date: 12 September 2024



Solicitor on the Record
Contact solicitor

Kerry Anderson
Mike Campbell

kerry.anderson@dlapiper.com
mike.campbell@dlapiper.com

+64 4 474 3255
+64 4 474 3203

Level 4, 20 Customhouse Quay, Wellington 6011
PO Box 2791, Wellington 6140
Tel +64 4 472 6289

TO: the Registrar
Environment Court
Wellington

- 1 Palmerston North City Council (**PNCC**) wishes to be party to Fonterra Limited's appeal against Manawatū-Whanganui Regional Council's decision on Plan Change 3 to the Manawatū-Whanganui One Plan (**Proceedings**).
- 2 PNCC is a local authority. It also made a submission on Plan Change 3 in relation to the implications it has on planning for future urban growth in its district.
- 3 PNCC is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**RMA**).
- 4 PNCC is interested in all the Proceedings. In particular, how intensification and expansion of urban environments is provided for where reverse sensitivity effects may arise, what reverse sensitivity effects should be addressed and the relationship between regionally significant industry and well-functioning urban environments.
- 5 PNCC opposes the relief sought because:
 - 5.1 It will adversely impact PNCC's ability to provide for urban growth, including through amending its district plan;
 - 5.2 it fails to properly give effect to higher order documents, including the National Policy Statement for Urban Development 2020;
 - 5.3 it is not the most appropriate set of provisions in light of the plan change tests set out in the RMA; and

5.4 it will not promote the sustainable management of natural and physical resources and it is not in accordance with Part 2 of the RMA.

6 PNCC agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Date: 12 September 2024



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Kerry M Anderson / M T N Campbell
Solicitors for Palmerston North City
Council

This document is filed by Kerry Anderson of DLA Piper New Zealand, solicitor for the Palmerston North City Council.

The address for service on the Palmerston North City Council is at:

DLA Piper New Zealand
Level 4, 20 Customhouse Quay
Wellington 6011

Documents for service on the Palmerston North City Council may be:

- left at the above address for service, or
- posted to the solicitor at PO Box 2791, Wellington 6140, or
- emailed to the solicitor at both kerry.anderson@dlapiper.com and mike.campbell@dlapiper.com.

Please direct enquiries to:

Mike Campbell
Tel +64 4 474 3203
Email mike.campbell@dlapiper.com

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.