

**BEFORE THE ENVIRONMENT COURT**

**AT AUCKLAND**

**ENV-2014-AKL-000054**

**IN THE MATTER of the Resource Management Act 1991  
("Act")**

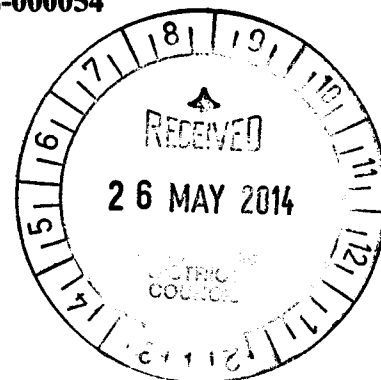
**AND**

**IN THE MATTER of an appeal under clause 14 of the First Schedule of the Act**

**BETWEEN Director-General of Conservation  
Appellant**

**AND WHANGAREI DISTRICT COUNCIL  
First Respondent**

**WHANGAREI RACING CLUB  
Second Respondent**



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**NOTICE OF BREAM BAY COASTAL CARE TRUST'S WISH TO BECOME  
A PARTY TO PROCEEDINGS**

**15 MAY 2014**

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**Bream Bay Coastal Care Trust  
PO Box 216  
Ruakaka 0151  
Phone 09 4328414**

**TO: The Registrar  
Environment Court  
Auckland**

**1. The BREAM BAY COASTAL CARE TRUST (BBCCT) gives notice under section 274 of the Resource Management Act 1991 ("RMA") that it wishes to be a party to the appeal by Director General of Conservation ("the Appellant") against the decision of the Whangarei District Council to approve the Proposed Private Plan Change 113.**

**2. BBCCT is a person who has an interest in the proceedings that is greater than the interest of the general public. BBCCT is a not-for-profit local environmental advocacy group. BBCCT was established in 2006 with the objective of helping to care for and enhance the 700 hectares of coastal land held by the Department of Conservation (DOC) in Bream Bay. BBCCT is directly involved in protecting rare and endangered species from extinction through predator control and directing human activities away from roosting and nesting sites and habitat restoration.**

**3. BBCCT made a submission, further submissions and presented evidence at the hearing on Plan Change 113.**

**4. BBCCT is not a trade competitor for the purposes of section 308C of the RMA.**

**5. 5.1 BBCCT supports 6.1 the appeal against Rule REE1.2.1 which states: 'Any Management Plan or development that would result in more than 350 residential units in total within the whole of the REE shall be a non-complying activity'.**

**5.2 BBCCT supports all of 6.2 of Director General of Conservation's appeal**

**6. BBCCT supports all of the Director General of Conservation's reasons for the appeal.**

**7. 7.1 BBCCT supports the following relief: 8.2.1, 8.2.2, 8.2.3**

**7.2 BBCCT supports the following relief 8.3**

**8. In relation to 7.1 of the appeal BBCCT opposes the relief sought because 100 residential units**

**a) would not give effect to the NZCPS**

**b) The relief sought does not promote sound resource management practice.**

**c) The relief sought by the Appellant does not promote the sustainable**

management of natural and physical resources under section 5 of the RMA

d)The relief sought by the Appellant does not recognise and provide for matters of national importance under section 6 of the RMA including the preservation of the natural character of the coastal environment including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development (section 6(a)).

(e)The relief sought by the Appellant does not have particular regard to other matters under section 7 of the RMA.

9. BBCCT agrees to participate in mediation or other alternative dispute resolution.

**Dated 16 May 2014**

Signed for and on behalf of the BREAM BAY  
COASTAL CARE TRUST by it's duly authorised  
agent

**David Lourie**



**ADDRESS FOR SERVICE**  
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