

**BEFORE THE ENVIRONMENT COURT**

**ENV-2020-CHC-000041,  
44, 47**

**AT CHRISTCHURCH**

**I MUA I TE KOOTI TAIAO**

**IN THE MATTER**

of an appeal under clause 14  
of Schedule 1 of the Resource  
Management Act 1991

**BETWEEN**

**KPF Investments Limited  
and United Fisheries  
Limited**

**Beleve Limited, RJ  
Davidson Family Trust  
and Treble Tree Holdings  
Limited**

**Goulding Trustees  
Limited and Shellfish  
Marine Farms Limited**

*Appellants*

**AND**

**Marlborough District  
Council**

*Respondent*

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**NOTICE OF WISH TO BE A PARTY TO PROCEEDINGS BY THE  
MINISTER OF CONSERVATION**

**Dated: 8 June 2020**

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Department of Conservation

Solicitor/Counsel acting: M Pemberton/D van Mierlo

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## **Notice of person's wish to be a party to proceedings**

### **Section 274 Resource Management Act 1991**

To: The Registrar  
Environment Court  
CHRISTCHURCH

1. The **Minister of Conservation** (the **Minister**) wishes to be a party to the following proceedings:
  - 1.1.1. KPF Investments Limited and United Fisheries Limited;
  - 1.1.2. Beleve Limited, RJ Davidson Family Trust and Treble Tree Holdings Limited; and
  - 1.1.3. Goulding Trustees Limited and Shellfish Marine Farms Limited.
2. The Minister made submissions and appeared at the Council hearing on the proposed Marlborough Environment Plan (the Plan).
3. The Minister is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (RMA).
4. The Minister also has an interest greater than the interest the general public has, specifically regarding conservation values and the implementation of the New Zealand Coastal Policy Statement.
5. The Minister is interested in all of the proceedings, but has a particular interest in parts of the appeal relating to:
  - 5.1. Chapter 6, Natural Character and Chapter 7, Landscape.
6. The Minister **opposes** the relief sought.

### ***Relief opposed***

7. The Minister opposes the relief sought in relation to:

- 7.1. the provisions of Chapters 6 and 7 in Volume 1;
  - 7.2. the mapping of the extent of landscapes and natural features, and natural character of the coastal environment and the methodology behind the mapping; and
  - 7.3. the related schedules in Appendix 1 and Appendix 2 in Volume 3.
8. The reasons for opposition are that the Minister supports the Plan as decided by the Council in respect of the matters listed in paras 7.1 to 7.3. The Plan in respect of these matters was based on robust assessments using sound methodology and is consistent with the NZCPS.
9. The Minister agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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Matt Pemberton/Dean van Mierlo  
Solicitor/Counsel for the Minister of Conservation

8 June 2020

Address for service of person wishing to be a party:

**Minister of Conservation**  
Planning Shared Services  
Department of Conservation  
Private Bag 4715, Christchurch Mail Centre, Christchurch 8140

*Contact persons*  
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And

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**Advice**

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