

Form 33

Notice of a person's wish to be party to proceeding (section 274, Resource Management Act 1991)

The Registrar  
Environment Court  
Wellington

1. I, Frederick David Edmonds, wish to be a party to the following proceedings:  
A Notice of Appeal lodged on 18 August 2025 by The Royal Forest and Bird Protection Society of New Zealand (Forest and Bird) against decisions made by the Wellington City Council on the Proposed Wellington District Plan.
2. I am a person who made a submission about the subject matter of the proceedings.
3. I am not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
4. I am interested in part of the proceedings, namely a new rule proposed by Forest and Bird to manage indigenous vegetation clearance outside SNAs (Item 35 in the Table included in Forest and Bird's Notice of Appeal). I oppose the relief sought by Forest and Bird for the reasons outlined below.
5. In its Notice of Appeal, Forest and Bird seeks to reverse the decision of the Wellington City Council to accept the recommendation of the Independent Hearing Panel (IHP) regarding indigenous vegetation clearance rules as they apply to All Other Zones, ie zones other than General Rural, Open Space and Recreational and Wellington Town Belt. My particular interest is in indigenous vegetation clearance rules as they apply to Residential Zones, a topic I covered in my presentation to the IHP on 13 September 2024.
6. The introduction of indigenous vegetation clearance rules had been recommended by Council planning officer Mr McCutcheon but the IHP disagreed with his recommendation and did not include any rules in their recommendation to Council. In their appeal, Forest and Bird seek the introduction of indigenous vegetation clearance rules, but with amendment to the rules recommended by Mr McCutcheon.
7. In their Notice of Appeal, Forest and Bird seek to introduce rules that include a limit on the permitted clearance of indigenous vegetation on a residential lot to a contiguous area of no more than 100m<sup>2</sup>. They further seek to exclude from trimming, pruning or removal as a permitted activity any tree larger than

those listed in Schedule 9 – Indigenous Tree Sizes, irrespective of whether such trees are inside or outside the 100m<sup>2</sup> area.

8. I oppose the relief sought by Forest and Bird as the introduction of indigenous vegetation clearance rules could well result in building a dwelling on a residential lot no longer being a permitted activity. The introduction of any vegetation clearance rules in the District Plan would have a disproportionate impact upon a vacant residential lot as compared to an existing developed lot, for the simple reason that vegetation clearance will already have been carried as part of the development.
9. The Council is seeking to intensify residential development along main transport corridors. If any vegetation clearance rules were to be introduced, development of a vacant bush covered residential lot near a main transport corridor would no longer be a permitted activity, as it is not feasible to build a dwelling on a 100m<sup>2</sup> footprint. Even if the clearance area were to be doubled to 200m<sup>2</sup>, which would make it possible to accommodate a modest sized dwelling, additional clearance may be needed for paths, corridors for underground services and clearance around the house to meet fire safety concerns.
10. It is for the above reasons that I oppose the introduction of any indigenous vegetation clearance rules for residentially zoned lots, particularly for vacant residentially zoned lots.
11. I agree to participate in mediation or other alternative dispute resolution of the proceedings.

*FD Edmonds*

Signature of person wishing to be a party

Date *1 Sept 2025*

Address for service of person wishing to be a party:  
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