

BEFORE THE ENVIRONMENT COURT

I MUA I TE KOOTI TAIAO O AOTEAROA

AT CHRISTCHURCH

ENV – 2018 – CHC – 000035

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of an appeal under clause 14(1) of the First Schedule of
the Act in relation to the Proposed Southland Water and
Land Plan

BETWEEN

Beef + Lamb New Zealand

Appellant

AND

Southland Regional Council

Respondent

NOTICE OF DIRECTOR-GENERAL OF CONSERVATION'S

WISH TO BECOME A PARTY TO PROCEEDINGS

Section 274 Resource Management Act 1991

Department of Conservation

Planning, Permissions and Land

Department of Conservation

Private Bag 4715

Christchurch 8140

Phone: 03 371 3700

Solicitor: Pene Williams

To: The Registrar
 Environment Court
 Christchurch

1. I, Lou Sanson, Director-General of Conservation (the Director-General) wish to be a party to an appeal against part of the decision of the Southland Regional Council on the Proposed Southland Water and Land Plan (the proposed Plan) by Beef + Lamb (the appellant), ENV – 2018 – CHC – 000035 (the notice).
2. I made a submission on the proposed Plan¹, in particular on Rule 20².
3. I am not a trade competitor for the purposes of section 308C or section 308CA of the Resource Management Act 1991 (RMA).
4. I am interested in all of the appeal.
5. My interests are as follows:

Rule 20 – Farming

- 5.1. In paragraphs 6 – 13 of its notice, the appellant appeals that part of the decision dealing with Rule 20, as the appellant considers the decision is contrary to Part 2 of the RMA and will not give effect to the National Policy Statement for Freshwater Management 2014 (as amended 2017) (NPSFM).
- 5.2. The appellant seeks the matters for discretion in Rule 20(d) be amended:
 - 5.2.1. To ensure water quality will not be adversely affected and ensure that water quality standards, limits, and targets are met; and
 - 5.2.2. To discourage land use intensification and conversion which would affect the catchment’s ability to meet water quality standards and targets; and
 - 5.2.3. To prevent the allocation of nutrients in the catchment by resource consent; and
 - 5.2.4. To ensure that existing land users and communities are recognised and provided for.
6. I oppose the relief sought in the notice with respect to Rule 20(d). My reasons for opposing the relief are as follows:

¹ Submitter Number 210

² Submission Point 210.82

- 6.1. It is not appropriate to recognise and provide for existing land users. This implies that existing land users may not be subject to water quality limits that are established in the Freshwater Management Unit processes.
- 6.2. The relief sought by the appellant:
 - 6.2.1. is contrary to section 10(4) of the RMA.
 - 6.2.2. fails to give effect to the NPSFM as required by section 67(3) of the RMA in particular: Objectives A1 and A2.
 - 6.2.3. fails to give effect to New Zealand Coastal Policy Statement as required by section 67(3) of the RMA, in particular: Objectives 1 and 7, and policies 3, 5, 11,13, 21 and 23.
 - 6.2.4. fails to give effect to the Southland Regional Policy Statement as required by section 67(3) of the RMA, in particular: Objectives WQUAL.1, WQUAL.2 and WQUAL.3, and Policies WQUAL.1, WQUAL.2 WQUAL.5 and WQUAL.6.
7. I agree to participate in mediation or other alternative dispute resolution of the proceedings.

Dated the 22nd of June 2018



Aaron Fleming, Director Operations, Southern South Island Region
Pursuant to delegated authority from the Director-General of Conservation³

Address for service of interested party:

Director-General of Conservation
Planning, Permissions and Land
Department of Conservation
Private Bag 4715
Christchurch 8011

³ A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18-32 Manners Street, Wellington 6011
SAR-04-83-117 Beef + Lamb No.2 - proposed Southland Water and Land Plan - s274 joining notice - DOC-5504219 - DOC-5

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