

**BEFORE THE ENVIRONMENT COURT**

**ENV-2018-CHC-000044**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of an Appeal under clause 14 of the First Schedule of the Resource Management Act 1991 in relation to the proposed Southland Water and Land Plan

**BETWEEN** **CAMPBELL'S BLOCK LIMITED**

**Appellant**

**AND** **SOUTHLAND REGIONAL COUNCIL**

**Respondent**

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**NOTICE OF REQUEST TO BE PARTY TO PROCEEDINGS UNDER SECTION 274 OF THE RESOURCE MANAGEMENT ACT 1991**

**FAIRLIGHT STATION LIMITED**

Dated this *22<sup>nd</sup>* day of June 2018

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PRESENTED FOR FILING BY:

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**NOTICE OF REQUEST TO BE A PARTY TO PROCEEDINGS UNDER S274 OF THE RESOURCE  
MANAGEMENT ACT BY FAIRLIGHT STATION LIMITED**

1. Fairlight Station Limited ("**Fairlight**") wishes to be a party to Notice of Appeal ENV-2018-CHC-000044 dated 17 May 2018 by Campbell's Block Limited to the Environment Court ("**the Appeal**") against the Decision of the Southland Regional Council on the Proposed Southland Water and Land Plan.
2. Fairlight is entitled to be a party to the Appeal because it made a Submission on the Proposed Plan.
3. Fairlight is not a trade competitor for the purposes of s308C or s308CA of the Resource Management Act 1991.
4. Fairlight is interested in that part(s) of the Appeal that relates to:

**Rule 20 Farming**

- a. The restrictions for intensive winter grazing area size and mob size

**Rule 25 Cultivation on sloping ground**

- a. The restrictions on cultivation on certain slopes

5. Fairlight supports the relief sought in the Appeal regarding **Rule 20 Farming** and **Rule 25 Cultivation** for the reasons set out below, which are based on my submission and the reasons in the Appeal.

**6. Rule 20 Farming**

*(i) Area size – Rule 20(a)(iii)(1) - The proposal to allow intensive winter grazing on no more than 15% of a landholding or 100 hectares, whichever is the lesser*

- a. The effective stock area of Fairlight is 2,500 ha with another 850ha in forestry. We do not grow a continuous block of 100ha – we use crop rotation for pasture renewal and development.
- b. It is difficult to see how water quality will be improved on Fairlight if a consent has to be obtained to winter graze on more than 100ha.
- c. If there needs to be a rule, it should be based on stock units.

(ii) *Mob size - Rule 20(a)(iii)(3)(E) –*

- a. It is unclear what sized area the provision applies to;
- b. It creates a meaningless split of mobs (herds) for the same environmental impact; and
- c. Larger properties are penalised because of the larger scale, larger mobs (herds) and more land per animal.

7. **Rule 25 Cultivation on sloping ground**

(i) *Cultivation on land with a slope greater than 20 degrees - Rule 25(a)(iv)*

- a. is not practical and creates an inefficient use of land via 10m corridors;
- b. results in a loss of productive land;
- c. creates breeding grounds for weeds and pests;
- d. results in greatly increased costs of maintenance, including spraying;
- e. potentially devalues the Appellant's (and other) property;
- f. is not necessary, as with good management practices (as required in the Farm Environmental Management Plan), any adverse effects associated with a 3m setback can be adequately avoided, remedied or mitigated;

8. Fairlight agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Signed for and on behalf of Fairlight Station Limited:-



**Clare Lenihan**  
Counsel

Dated this 22 day of June 2018

**Address for service of s274 party:**

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