

IN THE MATTER of an appeal under clause 14(1) of
the First Schedule of the Resource
Management Act 1991

AND IN THE MATTER OF the Proposed Southland Water
and Land Plan

BETWEEN **PETER DONALD CHARTRES,
TE ANAU DOWNS STATION**

Appellant

AND **SOUTHLAND REGIONAL
COUNCIL**

Respondent

**NOTICE PURSUANT TO SECTION 274
OF THE RESOURCE MANAGEMENT ACT 1991**

To: The Registrar
Environment Court
Christchurch

TAKE NOTICE that Federated Farmers of New Zealand Inc (Southland) gives notice pursuant to s274 of the Resource Management Act 1991 that it wishes to appear as a party to the above proceedings.

This Notice is made upon the following grounds:

- 1 Federated Farmers of New Zealand Inc (Southland) lodged a submission and Further submission to the Proposed Southland Water and Land Plan to which this appeal relates and/or has an interest in these proceedings that is greater than the public generally.
- 2 Federated Farmers of New Zealand Inc (Southland) is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
- 3 Federated Farmers of New Zealand Inc (Southland) has an interest in, and supports all of the appeal, in particular in relation to:

Rule 20(a)(iii)(1) & (e) Intensive Winter Grazing – Area & Mob Size

- Federated Farmers lodged a Submission and Further Submission on this Rule.
- We consider the rule is inequitable and creates uncertainty for future farm development and productivity improvements on larger, extensively farmed properties.
- We agree with the appellant that the requirement is arbitrary and impractical, for the same reasons as set out in our appeal;
- We oppose the restriction on herd size proposed. We believe it will lead to perverse outcomes and won't achieve the objectives intended.
- We support the appellant's relief sought for Rule 20.

Rule 70

- Federated Farmers lodged a Submission and Further Submission on this Rule.
- We oppose hill and high country farmers from being subject to the requirements in this rule.
- For hill and high country farms, the cost of fencing waterways and providing a reticulated water system would be prohibitive, and in some areas impossible. We do not consider the exclusion of extensively grazed cattle is justified from a water quality, biodiversity, or bank erosion point of view. In addition, flooding can wash fences away meaning investment in flood-prone areas is a dead loss.
- The cost of compliance with this Rule will significantly and disproportionately outweigh any positive environmental benefits.
- We support the appellant's relief sought for Rule 70.

Appendix A- Regionally Significant Wetlands

- Federated Farmers lodged a Further Submission on this Rule.
- We oppose the additional sites added to Appendix A.
- It is inappropriate to revise Appendix A without thorough research, investigation and ground-truthing.

- Extensive public consultation and landowner consultation is required before making such significant additions to Appendix A.
 - Federated Farmers considers many of the additional wetlands listed are not regionally significant.
 - To revise the scope from 'regionally significant wetlands' to 'regionally significant wetlands and sensitive waterbodies' takes the Appendix beyond the scope of what was originally notified.
 - There is no s32 analysis on the additional 'sensitive' waterbodies being incorporated into the Appendix.
 - We support the appellant's relief sought for Appendix A.
 - We seek all additional entries to Appendix A be deleted from the Plan.
4. Federated Farmers of New Zealand Inc (Southland) agrees to attend mediation and/or dispute resolution in regard to these proceedings.

Dated the 22nd day of June 2018



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