

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 **DIRECTOR GENERAL OF
CONSERVATION**

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 (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 (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 (Southland) is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
- 3 Federated Farmers of New Zealand (Southland) has an interest in all of the appeal, in particular in relation to:

Policy 16 – Farming Activities that Affect Water Quality

- Federated Farmers lodged a Submission and Further Submission on this policy.
- We oppose the relief sought by the appellant. The relief lacks certainty and is open to misinterpretation. Plan users would not easily be able to determine whether they would satisfy this policy or not.

Policy 29- Provide for the Extraction of Gravel

- Federated Farmers lodged a Submission and Further Submission on this policy.
- We oppose the relief sought by the appellant as it lacks certainty. The locations of bird breeding habitat must be defined otherwise all areas could be potentially excluded for gravel extraction.
- We oppose the relief sought by the appellant.

Rule 78 – Weed and Sediment removal for drainage maintenance

- Federated Farmers lodged a Submission and Further Submission on this Rule.
- The appellant seeks to remove the term “sediment” and replace with the term “mud”. The proposed wording is unclear as it seeks to remove a term used within the RMA in favour of a term that is not.
- When applying the rule as suggested by the appellant, if a landowner cleared their drainage system and extracted a pebble within the sediment, the permitted rule would no longer apply and resource consent for that pebble would be required. At times, the intent of the excavation will be to remove some gravels in conjunction with sediment and weeds.
- The relief then sought for Rule 78(a)(iii) refers to gravels, however should the term “sediment” be removed in favour of ‘mud’, the rule would not allow for the incidental extraction of gravels.

- We consider the use of the word “sediment” is both practical and has been tested in the RMA environment.
 - With respect to the concern of galaxiids being affected by occasional drainage maintenance, we consider the biggest threat to galaxiid populations are trout and more emphasis should be directed to reducing predation.
 - We oppose the relief sought by the appellant.
4. Federated Farmers of New Zealand (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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