

**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** **ROBERT GRANT**

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:

Rule 20(a)(iii)(3)(E) Intensive Winter Grazing – Mob Size

- Federated Farmers submitted on, and lodged their own appeal to this rule.
- Based on our experience, the proposed maximum number for a mob is unnecessarily restrictive. The provision is blunt and discounts the broad range of ways Southlander's farm their land.
- Often larger mobs are grazed over larger blocks with a lessened impact on the soils. This rule will negate this ability for no environmental gain.
- The rule suggests the effects of 120 calves is equitable to 120 heifers. No provision has been applied to consider the effect of animal bulk in determining the mob size. This can be addressed in the Farm Management Environmental Plan, which recognises every farm has its own unique circumstances.
- We support the appellant in relation to this provision. Should the appeal of FFNZ (Southland) be unsuccessful, we support the relief proposed by the appellant as an alternative.

Rule 20(a)(iii)(1) Intensive Winter Grazing - Area

- 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 support the appellant's relief sought for Rule 20.

Rule 25(a)(iv) - Cultivation

- Federated Farmers lodged a Submission and Further Submission on this Rule. We also appealed this provision.
- With respect to Rule25(a)(iv), Federated Farmers supports set-backs from waterways for cultivation to reduce sedimentation and loss of top-

soil, but disagree with the extent of those proposed in the Plan. Under the rules as drafted, there is a significant amount of land that would not be able to be worked for crops, even those crops that are fast growing, and would not be used for intensive winter grazing.

- Federated Farmers considers land sloping between 20 and 30 degrees can be cultivated under some circumstances.
- We support the appellant in relation to this provision and support the relief they seek should our appeal be unsuccessful.

4. Federated Farmers of New Zealand (Southland) agrees to attend mediation and/or dispute resolution in regard to these proceedings.

Dated the 22<sup>nd</sup> day of June 2018



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