

BEFORE THE ENVIRONMENT COURT

ENV-2018-CHC-000045

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 **ROBERT GRANT**

Appellant

AND **SOUTHLAND REGIONAL COUNCIL**

Respondent

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

Dated this 21st day of June 2018

Mt Peel Ltd
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**NOTICE OF REQUEST TO BE A PARTY TO PROCEEDINGS UNDER S274 OF THE RESOURCE
MANAGEMENT ACT BY ROBERT GRANT**

1. Mt Peel Ltd wishes to be a party to Notice of Appeal ENV-2018-CHC-000045 dated 17 May 2018 by Robert Grant to the Environment Court ("**the Appeal**") against the Decision of the Southland Regional Council on the Proposed Southland Water and Land Plan ("**the Proposed Plan**").
2. Mt Peel Ltd is entitled to be a party to the Appeal because:-
 - (a) We made a submission on the Proposed Plan.
 - (b) We own and farm land in Southland, the management of which will be directly affected by the relief sought in the Appeal.
3. Mt Peel Ltd is not a trade competitor for the purposes of s308C or s308CA of the Resource Management Act 1991.
4. We are interested in the parts of the Appeal as set out below:-
5. **Rule 20 – Farming**
Intensive Winter Grazing – size of area allowed to be grazed – rule 20 (a) (iii) (1)

Decision Appealed

The council's decision to accept only in part my submissions 332.2 with the result that the area of permissible intensive winter grazing is 15% of a land holding or 100 hectares, whichever is the lesser.

Reason for support

We do not agree with the 100-hectare limit, as this penalizes larger operators who need more than 100 hectares to feed their capital stock.

We believe for bedrock/hill country zone a percentage basis will work more effectively as farms on average need 7-12% of their land to grow winter feed to feed their capital stock. So a hectare limit is not practical, 15% would be a far better solution in this physiographic zone.

6. **Rule 25 – Cultivation (a) (1v)**

Decision Appealed

The council's decision to reject my submission 332.3.2, requesting it allow a percentage of land over 20 degrees be cultivated as a permitted activity.

Reason for Support

This rule will affect approximately 80% of our farm, so therefore we will not be able to grow the winter feed required to feed our capital stock. By using alternative practices spray and pray/direct drilling the risk of overland flow into waterways can be hugely reduced compared to traditional cultivation.

7. Mt Peel Ltd agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Signed for and on behalf of Mt Peel Ltd



Logan Evans

Dated this 22nd day of June 2018

Address for service of s274 party:

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