

**BEFORE THE ENVIRONMENT COURT  
I MUA I TE KOOTI TAIAO O AOTEAROA  
IN CHRISTCHURCH**

**ENV-2018-CHC-000028**

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

**AND**

**IN THE MATTER** of appeals pursuant clause  
14 of Schedule 1 to the Act  
in relation to the Decision  
on the Proposed Southland  
Water and Land Plan

**BETWEEN** **HORTICULTURE NEW  
ZEALAND**

**Appellant**

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

**Respondent**

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**NOTICE OF PERSON'S INTENTION TO BECOME A PARTY TO PROCEEDINGS  
PURSUANT TO SECTION 274 OF THE RESOURCE MANAGEMENT ACT 1991**

**DATED 22 JUNE 2018**

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## NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS

*Section 274, Resource Management Act 1991*

**To:** The Registrar  
Environment Court  
Christchurch

1. Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Oraka Aparima (collectively Ngā Rūnanga), and Te Rūnanga o Ngāi Tahu (collectively Ngāi Tahu) (collectively, **Ngā Rūnanga**), wish to be a party to the above proceeding.
2. Ngā Rūnanga made a submission about the subject matter of the proceedings.
3. In addition, Te Rūnanga is the iwi authority over the takiwā of Ngāi Tahu which includes all of the area covered by the Southland Regional Council. Te Rūnanga is comprised of 18 Papatipu Rūnanga including Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua and Te Rūnanga o Oraka Aparima within whose takiwā the Southland region lies. In that respect, Te Rūnanga has an interest in the proceedings greater than the general public.
4. Ngā Rūnanga are not trade competitors for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**RMA**).
5. Ngā Rūnanga are interested in part of the proceedings.
6. The parts of the proceedings Ngā Rūnanga are interested in are:
  - (a) **Policy 39A Consideration of Resource Consent Applications** – Applying or considering integrated catchment management at a resource consent level. Moving the requirement from a consideration for resource consent application to a requirement for policies developed under the Freshwater Management Unit process.
  - (b) **Rule 14 Fertiliser** – Applying rule only to natural wetlands not wetlands generally. Changing the rule from non-complying to restricted discretionary where it does not meet the permitted rule.

- (c) **Rule 25 Cultivation on sloping ground** – Increasing the frequency of cultivation which does not meet setback distance from more than once in any five year period. Including an option allowing for cultivation to be undertaken in accordance with the ‘Erosion and Sediment Control Guidelines for vegetable production (Horticulture NZ 2014)’.
- (d) **Definition natural wetland** – Removal of sediment traps and artificial wetlands from definition.
- (e) **Definition wetland** – Clarifying, through a list of exclusions, what is a wetland and what is a natural wetland for the purposes of the Plan.

7. Ngā Rūnanga opposes in the relief sought by Horticulture New Zealand because:

- (a) They are concerned amendment to the provisions for wetlands will mean that some sites of significance to Ngā Rūnanga for protection of taonga species and/or mahinga kai may be degraded.
- (b) Integrated catchment management aligns with ki uta ki tai and Ngā Rūnanga agreed with the s42A Report that it is appropriate that consideration is given to this in resource consent hearings as it assists in achieving Objective 1, which seeks that land water and associated ecosystems are managed as integrated resources.
- (c) The proposed plan was intended to “hold the line” in terms of the quality of the region’s environment and freshwater resources. Ngā Rūnanga are concerned that the amendment to the frequency of cultivation on sloping ground will not achieve this.

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

**DATED** at Wellington this 22 day of June 2018



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J G A Winchester  
Counsel for Ngā Rūnanga

**Address for service of person wishing to be a party:**

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