

**BEFORE THE ENVIRONMENT COURT**

**I MUA I TE KOOTI TAIAO O AOTEAROA**

**AT CHRISTCHURCH**

**ENV – 2018 – CHC – 00026**

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of an appeal under clause 14(1) of the First Schedule of  
the Act in relation to the Proposed Southland Water and  
Land Plan

**BETWEEN**

**Transpower New Zealand Limited**

Appellant

**AND**

**Southland Regional Council**

Respondent

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**NOTICE OF WISH OF DIRECTOR-GENERAL OF CONSERVATION TO BECOME A  
PARTY TO PROCEEDINGS**

Section 274 Resource Management Act 1991

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**Department of Conservation**

Planning, Permissions and Land

Department of Conservation

Private Bag 4715

Christchurch 8140

Phone: 03 371 3700

Solicitor: Pene Williams

**To:** The Registrar  
 Environment Court  
 Christchurch

1. I, Lou Sanson, Director-General of Conservation (the Director-General) wish to be a party to an appeal against part of the decision of the Southland Regional Council on the Proposed Southland Water and Land Plan (the proposed Plan) by Transpower New Zealand Limited (the appellant), ENV – 2018 – CHC – 000026 (the notice).
2. I made a submission and further submission on the proposed Plan<sup>1</sup>, in particular new Policy 26A<sup>2</sup>.
3. I am not a trade competitor for the purposes of section 308C or section 308CA of the Resource Management Act 1991 (RMA).
4. I am interested in part of the appeal.
5. My interests are as follows:

Policy 26A – Infrastructure

5.1. In paragraphs 9 – 15 of the notice, the appellant appeals the part of the decision dealing with Policy 26A and seeks amendments to better reflect policy direction in the Southland Regional Policy Statement 2017 (SPRS) and the National Policy Statement on Electricity Transmission Activities 2008 (NPSET).

5.2. The appellant seeks to amend Policy 26A as follows:

*Recognise and provide for the effective development, operation, maintenance and upgrading of regionally significant, nationally significant and critical infrastructure in a way that, where practicable, avoids, ~~where practicable, or otherwise~~ remedies, or mitigates, adverse effects on the environment.*

6. I oppose the relief sought in the appeal with respect to Policy 26A. The reasons for opposing the relief sought are as follows:
  - 6.1. I consider the relief sought by the appellant considerably weakens the policy. As the policy is not limited to electricity transmission activities the relief sought is inappropriate and may have unintended consequences.
  - 6.2. The relief sought by the appellant:

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<sup>1</sup> Submitter Number 210

<sup>2</sup> Further submission point on GDC, ICC and SDC 330.1

- 6.2.1. is contrary to Part 2 of the RMA by not achieving the sustainable management purpose in section 5; and failing to recognize and provide for matters of national importance including: section 6(a) natural character of wetlands, lakes, rivers and coastal environment and their margins, section 6(b) protection of outstanding landscapes and natural features and section 6(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.
- b) fails to give effect to the National Policy Statement for Freshwater Management 2014 (as amended 2017) as required by section 67(3) in particular: Objectives A1, A2 and B1.
- c) in the coastal environment, fails to give effect to the New Zealand Coastal Policy Statement 2010 as required by section 67(3) of the RMA, in particular: Objective 1 and 7, and Policies 3, 5, 11, 13, 21 and 23.
- d) fails to give effect to the SRPS as required by section 67(3) of the RMA, in particular: Objective WQUAL.1, Policies WQUAL.1 and WQUAL.2.

7. I agree to participate in mediation or other alternative dispute resolution of the proceedings.

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



Aaron Fleming, Director Operations, Southern South Island Region

Pursuant to delegated authority from the Director-General of Conservation<sup>3</sup>

*Address for service of interested party:*

Director-General of Conservation

Planning, Permissions and Land

Department of Conservation

<sup>3</sup> A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18-32 Manners Street, Wellington 6011  
SAR-04-83-117 Transpower - proposed Southland Water and Land Plan - s274 joining notice - DOC-5505963

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