

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 **TRANSPower NEW ZEALAND
LIMITED**

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 Inc (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 Inc (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 Inc (Southland) is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
- 3 Federated Farmers of New Zealand Inc (Southland) opposes the appeal, and is interested in all parts of the proceeding, in particular in relation to:

Policy 26A

- Federated Farmers opposes relief sought.
- We do not consider it unreasonable for the plan to require that Transpower remedies or mitigates its environmental impacts (where avoidance is not practicable);
- The National Policy Statement for Electricity Transmission does not provide Transpower (and all other owners of Critical Infrastructure) with an overriding ability to disregard its environmental footprint.
- The proposed Water and Land Plan applies to all resource users within the region, and Transpower is not absolved of responsibility in this regard;

Rule 59

- Federated Farmers strongly opposes the relief sought.
- There are no higher order documents that provides for such a restrictive level of relief;
- By seeking a 12m setback from Transpower's structures, in effect a 24m 'grab of land' is being sought, which is completely unnecessary, unreasonable and unjustified.
- There is no precedent elsewhere in the country where Transpower has been able to substantiate justifying the need for such unreasonable restrictions on the very landowners hosting Transpower's assets.
- There is no evidence to show that a culvert would permanently physically impede Transpower's access and subsequent ability to maintain, operate or upgrade its assets.
- Policy 10 of the National Policy Statement for Electricity Transmission only requires decision-makers to the extent reasonably possible, to manage activities to ensure that operation, maintenance, upgrading and development of the electricity transmission network are not compromised.
- There has been absolutely no justification provided for seeking a blanket 24m 'buffer' around Transpower's assets from culverts; a culvert in and of itself will certainly not compromise access to Transpower's assets, more likely it would aid access to them;

- Landowners' designing and erecting culverts are already required to comply with all other regional and district plan rules, including earthworks rules taking into consideration the requirements of the New Zealand Electricity Code of Practice 34:2001;
4. Federated Farmers of New Zealand Inc (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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