#### BEFORE THE ENVIRONMENT COURT

ENV-2018-CHC-000030

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** 

WILKINS FARMING COMPANY LIMITED

**Appellant** 

AND

**SOUTHLAND REGIONAL COUNCIL** 

Respondent

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

### **ROBERT GRANT**

Dated this 22 day of June 2018

PRESENTED FOR FILING BY:

Counsel for the Appellant

Clare Lenihan
Barrister
102 Jed Street
INVERCARGILL 9810
Tel: (03) 214 1674

E: clare.lenihan@environmentallawyer.co.nz

Instructing Counsel

Jeff Walker

Walker Murdoch Law Ltd

PO Box 1188 INVERCARGILL 9840 Tel: (03) 214 0777

E: jeff@wmlaw.co.nz

# NOTICE OF REQUEST TO BE A PARTY TO PROCEEDINGS UNDER \$274 OF THE RESOURCE MANAGEMENT ACT BY ROBERT GRANT

- Robert Grant wishes to be a party to Notice of Appeal ENV-2018-CHC-000030 dated 17 May 2018 by Wilkins Farming Company Limited to the Environment Court ("the Appeal") against the Decision of the Southland Regional Council on the Proposed Southland Water and Land Plan.
- 2. Robert Grant is entitled to be a party to the Appeal because:-
  - (a) He lodged Notice of Appeal ENV-2018-CHC-000045 dated 17 May 2018 ("Robert Grant Appeal") which seeks relief on matters addressed in the Appeal.
  - (b) He owns and farms land on Otamita, Eastern Southland, the management of which will be directly affected by the relief sought in the Appeal.
- 3. Robert Grant is not a trade competitor for the purposes of s308C or s308CA of the Resource Management Act 1991.
- 4. Robert Grant is interested in that part(s) of the Appeal that relates to Rule 20 Farming, in particular the restriction on mob (herd) size, Rule 20(a)(iii)(3)(E).
- 5. Robert Grant supports the relief sought in the Appeal regarding the restriction on mob (herd) size, Rule 20(a)(iii)(3)(E), to the extent that it is consistent with the relief in the Robert Grant Appeal, for the following reasons:-
  - (a) The grounds set out in the Appeal.
  - (b) The grounds set out in the Robert Grant Appeal.
- 6. Robert Grant agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Signed for and on behalf of Robert Grant:-

Clare Lenihan

Counsel

Dated this  $\frac{72}{2}$  day of June 2018

### Address for service of s274 party:

The offices of Clare Lenihan Barrister 102 Jed Street Invercargill 9810

Tel: (03) 214 1674

E: clare.lenihan@environmentallawyer.co.nz