

IN THE ENVIRONMENT COURT

ENV-2018-CHC-133

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 Queenstown Lakes
District Plan Stage 1

BETWEEN

**ROYAL FOREST AND BIRD
PROTECTION SOCIETY OF
NEW ZEALAND
INCORPORATED**

Appellant

AND

**QUEENSTOWN LAKES
DISTRICT 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) 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) lodged a submission and Further submission to the Proposed District 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) is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.

Extent of interest

3. Federated Farmers has an interest in all aspects of the proceedings, particularly as they relate to provisions applying to the entirety of the plan or in the rural areas of the District. The following reasons are key concerns raised by the Otago membership:
 - a. Federated Farmers is a representative of a number of farmers in the Queenstown Lakes District;
 - b. These farms incorporate a large proportion of the District's biodiversity, vegetation, fauna and habitat addressed through the appellant's appeals on the decisions version;
 - c. The matters under appeal and the relief sought have the potential to materially and significantly impact the viability of farming in the District;
 - d. The relief sought by the appellant in respect to the identification and particularly the protection of significant indigenous vegetation and significant habitats of indigenous fauna goes beyond what is required;
 - e. The appellant's inclusion of the term 'nature conservation values' throughout the relief sought would diminish the workability and clarity of the proposed plan, if adopted;
 - f. The appellant seeks amendments to broaden the Plan to include reference to winter buffers, wetlands, stock intensity and other aspects in a manner that overlaps with Otago Regional Council's water quality provisions, creating unnecessary duplication, confusion and unnecessarily broadening the Respondent's roles;
 - g. The appellant seeks the removal of the potential for offsetting, which provides an important and valuable tool for meeting the plan's objectives while allowing for development and resource use;
 - h. The appellant seeks amendments which will significantly increase the proportion of indigenous vegetation covered under the plan, or (in the case of additional criteria around indigenous vegetation clearance) significantly hinder farming practices, without consideration of the feasibility or cost of this increased protection or the additional consenting requirements;

- i. The appellant seeks to add 'connectivity' as a matter for consideration in respect to the retention and enhancement of indigenous vegetation without consideration of the feasibility or cost of this increased protection;
 - j. The appellant's relief sought generally introduces unnecessary costs and restrictions for plan users, particularly farmers, without considering the implications of these additional costs and restrictions.
4. Federated Farmers of New Zealand (Inc) agrees to attend mediation and/or dispute resolution in regard to these proceedings.

Dated the 10th day of July 2018.



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