## IN THE ENVIRONMENT COURT OF NEW ZEALAND CHRISTCHURCH REGISTRY

## I MUA I TE KŌTI TAIAO O AOTEAROA TE ŌTAUTAHI ROHE

ENV-2021-CHC-00092

**UNDER** The Resource Management Act

1991("Act")

**IN THE MATTER** An appeal under clause 14 Schedule

1 of the Act

BETWEEN THE DIRECTOR-GENERAL OF

**CONSERVATION** 

Appellant

AND MACKENZIE DISTRICT COUNCIL

Respondent

## NOTICE OF HALDON STATION LIMITED'S WISH TO BE A PARTY TO PROCEEDINGS

Dated: 26 August 2021

GRESSON DORMAN & CO Solicitors PO Box 244, Timaru 7940 Telephone 03 687 8004 Facsimile 03 684 4584 Solicitor acting: G C Hamilton georgina@gressons.co.nz Notice of Haldon Station Limited's wish to be a party to proceedings Section 274, Resource Management Act 1991

**TO:** The Registrar

**Environment Court** 

Christchurch

- 1. Haldon Station Limited wishes to be a party to the appeal ENV-2021-CHC-92.
- 2. Haldon Station Limited has an interest in the proceedings that is greater than the interest that the general public has. This interest is based on the grounds that Haldon Station Limited owns and leases land in the Mackenzie Basin on which it runs a mixed farming business and which is subject to the Mackenzie District Plan. Haldon Station Limited's land stewardship and farming operations are directly impacted on by the subject matter of the Appeal.
- 3. Haldon Station Limited is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
- 4. Haldon Station Limited is interested in all of the proceedings.
- 5. The relief sought by the Appellant has the potential to disadvantage Haldon Station Limited through constraints on land use leading to direct consequences including the environmental, economic, and social costs of any change to the decision version of Plan Change 18.
- 6. Haldon Station Limited is interested in the following particular issues:
  - (a) Appeal points listed in **Table 1** appended to the Appellant's notice of appeal; and
  - (b) All associated and / or ancillary matters.
- 7. Haldon Station Limited opposes the relief sought because:

- (a) The changes being sought are unnecessarily restrictive and have the potential to severely constrain the ability of Haldon Station Limited to care for its land, flora and fauna and its ability to farm sustainably and as such, the decision version of Plan Change 18 is preferred; and
- (b) The relief sought is inconsistent with:
  - (i) The purpose and principles of the RMA outlined in Part 2;
  - (ii) The Canterbury Regional Policy Statement;
  - (iii) Integration of the district plan;
  - (iv) Section 32 of the RMA; and
  - (v) Requirements for district plans set out in sections 72, 74 and 75 of the Act.
- 8. Haldon Station Limited agrees to participate in mediation or other alternative dispute resolution of the proceedings.

**Georgina Hamilton/Nicola Hornsey** 

Counsel for Haldon Station Limited

Date: 26 August 2021

**Address for service of Haldon Station Limited** 

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