

IN THE ENVIRONMENT COURT

ENV-2021-CHC-92

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

Plan Change 18 of the Mackenzie
District Plan

BETWEEN

**DIRECTOR-GENERAL OF
CONSERVATION**

Appellant

AND

**MACKENZIE 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) (Federated Farmers) lodged a submission and Further submission to Plan Change 18 of the Mackenzie District Plan (PC18) to which this appeal relates.
2. Federated Farmers has members across the Mackenzie District and on that basis, has an interest in these proceedings that is greater than the public generally.
3. Federated Farmers of New Zealand (Inc) (Federated Farmers) is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
4. Notice of the decision on PC18 was received by Federated Farmers on 24 June 2021, and we determined not to lodge an appeal to the Environment Court.
5. Federated Farmers is interested in all of the proceedings, in particular in relation to:

Definitions

Federated Farmers opposes the appellant's relief sought for the following definitions, which are intrinsically connected, with relief sought resulting in perverse, unnecessarily restrictive and resource intensive requirements. The definitions at issue are those for:

- improved pasture;
- significant indigenous vegetation;
- significant habitats of indigenous fauna; and
- vegetation clearance.

Rule 1.1.1(1)(a)


We oppose the appellant's relief sought to this rule, the inclusion of stock tracks and stock crossings as a permitted activity is appropriate and extremely unlikely to result in the clearance of areas of significant indigenous vegetation as suggested. We consider it is not substantiated via section 32 cost benefit appraisals and is not backed up by robust evidence.

Rule 1.1.1.7

We oppose the appellant's relief sought to the rule in relation to the improved pasture definition.

6. Federated Farmers of New Zealand (Inc) agrees to attend mediation and/or dispute resolution in regard to these proceedings.

Dated the 26th day of August 2021.



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