

**BEFORE THE ENVIRONMENT COURT  
AT CHRISTCHURCH**

ENV-2020-CHC-000035

**I TE KŌTI O AOTEAROA  
ŌTAUTAHI ROHE**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of an appeal under clause 14(1) of the First Schedule  
of the Act in relation to the Proposed Marlborough  
Environment Plan

**BETWEEN** **NELSON-MARLBOROUGH FISH AND  
GAME COUNCIL**

**Appellant**

**AND** **MARLBOROUGH DISTRICT COUNCIL**

**Respondent**

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**NOTICE OF ENVIRONMENTAL DEFENCE SOCIETY  
INCORPORATED'S WISH TO BECOME A PARTY TO  
PROCEEDINGS PURSUANT TO SECTION 274 RESOURCE  
MANAGEMENT ACT 1991**

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**TO:** The Registrar  
Environment Court  
CHRISTCHURCH

1. The Environmental Defence Society Incorporated (**EDS**) wishes to be party to the appeal by Nelson-Marlborough Fish and Game Council (**Appellant**) on the Marlborough District Council's decisions on the Proposed Marlborough Environment Plan (**PMEP**).
2. EDS made a submission on the PMEP in respect of matters raised in the appeal.
3. EDS has an interest in the proceedings that is greater than that of the public generally. EDS is a not-for-profit national environmental advocacy group. It was established in 1971 with the objective of bringing together the disciplines of law, science and planning to advocate for better environmental outcomes in resource management matters. It has been active in assessing the effectiveness of the Resource Management Act 1991 (RMA) and statutory planning documents in addressing key environmental issues
4. EDS is not a trade competitor for the purposes of s308D of the RMA.
5. EDS is interested in the aspects of the appeal listed below. It supports the relief sought in so far as it aligns with the relief in its own appeal.
  - a. Chapter 3 – Introduction
  - b. Chapter 5 – Introduction, Policy 5.2.3, Policy 5.2.4, Policy 5.2.7, Policy 5.2.8, Objective 5.7, Objective 5.8 and appeal point on over-allocation policies
  - c. Chapter 15 – Issue 15B and Table 15.1, Objectives 15.1(c) – (e), Policy 15.1.2, Policy 15.1.4, Methods 15.M.1 – 15.M.4 and 15.M.25 and the additional policies sought in relation to water degradation as a result of intensive agriculture

6. EDS also interested in any other consequential relief relating to biodiversity, freshwater quality and quantity, natural character and landscape protection.
7. EDS agrees to participate in mediation or other alternative dispute resolution.

**Reasons**

8. The Appellant seeks changes to the PMEP to give effect to, and ensure consistency with, the National Policy Statement on Freshwater Management 2017 (NPSFM). It also seeks recognition that the NPSFM has not yet been fully implemented in the Marlborough region.
9. EDS considers that the changes sought are in accordance with sound resource management practice, appropriately provide for the protection of the natural environment, give effect to national policy instruments and are consistent with Part 2 RMA.

**DATED** 8 June2020



**Cordelia Woodhouse**

Signed for and on behalf of the  
**ENVIRONMENTAL DEFENCE  
SOCIETY INCORPORATED** by its  
duly authorised agent

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