

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 Marlborough
Environmental Plan

BETWEEN **Royal Forest and Bird
Protection Society of New
Zealand Incorporated**

Appellant

AND **Marlborough District Council**

Respondent

**NOTICE PURSUANT TO SECTION 274
OF THE RESOURCE MANAGEMENT ACT 1991**

Address for Service:
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To: The Registrar
Environment Court
Christchurch

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 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 (the Act).

Extent of interest

3. Federated Farmers has an interest in the following aspect of the appeal:
 - a. **Policy 5.2.11**
 - We oppose the appellant's relief sought.
 - We consider the timeframe of 2024 is simply too tight and presents an administrative issue should appeals and central Government policies delay the process.
 - Faster planning processes do not necessarily equate to better quality plans.
 - Federated Farmers seeks the decisions version on the policy be retained.
 - b. **Policy 5.3.16**
 - We oppose the appellant's relief sought.
 - We understand the phrasing '*and seek to avoid*' of the policy in the decisions version is deliberate to distinguish itself from the phrase '*avoid*' which is effectively a prohibition.
 - Federated Farmers seeks to retain the wording of the decisions version.
 - c. **Policy 7.2.2**
 - We oppose the appellant's relief sought.

- Some lawfully established activities in the rural environment are consistent with the existing landscape and historical use of the land but may result in effects on landscape values that may be no more than minor.
- Federated Farmers prefers the wording of the decisions version.

d. Objective 8.1

- We oppose the appellant's relief sought.
- Federated Farmers is opposed to the addition of the wording proposed.

e. Policy 8.1.2 and 8.2.2

- We oppose the relief sought and consider that while the mapping of significant wetlands is appropriate, mapping of those considered not significant is not.
- Federated Farmers does not agree with the statement that the policy does not give effect to s6(c), the NPSFM or the NPCPS.
- Mapping is carried out by GIS audits and irrespective of whether a wetland is mapped or not, if it contains attributes that are significant it will be captured to some degree.
- Many areas that feature obligate wetland plant species are considered to be wetlands by some stakeholders irrespective of its size or value. It is not appropriate to map and adopt protections to all marginal wetland areas.
- Federated Farmers supports voluntary mechanisms for mapping wetlands.

f. Policy 8.2.10

- We oppose the relief sought in this provision and seek to retain the decisions version wording.
- This policy relates to areas that have indigenous biodiversity but do not meet the significance criteria. More directive management is appropriate in areas with significant indigenous biodiversity, but controls on lower values indigenous vegetation should have less stringent controls which overall is consistent with ss30 and 31.

g. Method 13.M.4

- We oppose the relief sought in this provision and prefer the decisions version.

- Not all permitted activities result in no more than minor adverse effects. They are nonetheless considered an effect that is consistent with the environment and part of the lawfully established use of the land.

h. **Standards Indigenous Vegetation**

3.3.12, 4.3.10, 7.3.7, 17.3.2, 18.3.3 and 19.3.4

- We oppose the relief sought in these standards by the appellant and prefer the wording of the decisions version.
- We consider the decisions version does give effect to ss6(c), 30, 31 and 5(a) & (b).
- Federated Farmers note that the genus *Chionochloa* has been spelt incorrectly throughout the Plan.
- This issue has been thoroughly traversed in other Plans throughout the country and we are frustrated with the proposed inflexible approach for landowners to responsibly manage their own properties.

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

Dated the 4th of June 2020



Kim Reilly
South Island Regional Policy Manager
Federated Farmers of New Zealand (Inc)