

**IN THE ENVIRONMENT COURT
AT CHRISTCHURCH**

ENV-2018-CHC - 254

IN THE MATTER

of an appeal pursuant to clause 14
of the First Schedule of the
Resource Management Act 1991

BETWEEN

**FEDERATED FARMERS OF NEW
ZEALAND INC.**
Appellant

AND

DUNEDIN CITY COUNCIL
Respondent

**NOTICE OF THE ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW
ZEALAND INCORPORATED'S WISH TO BE PARTY TO PROCEEDINGS**
31 January 2019

To: The Registrar
Environment Court
Christchurch

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated ('Forest & Bird') wishes to be a party to the appeal by Federated Farmers of New Zealand Inc ("the Appellant") reference **ENV-2018-CHC-254** against decisions of the Dunedin City Council ("the Respondent") on the Proposed Dunedin City District Plan.
2. Forest and Bird is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991.
3. Forest and Bird submitted on the subject matter of the proceedings.
4. Forest and Bird is interested in part of the proceeding.
5. The particular issues the Society is interested in are:
 - a. Relief point 17. 12 seeking that the Plan be amended to permit farming and grazing of existing paddocks in ASCV's.
 - b. Relief point 18. To amend Objective 10.2.3 and Policy 10.2.3.7 so that the values of areas of ONCC, and HNCC are required to be maintained or enhanced rather than preserved.
 - c. Relief point 19.9. To amend Rule 10.3.2A (a) (xiv) to change the permitted clearance of indigenous vegetation from areas that have been cultivated or clear of indigenous vegetation from 10 years to 15 years.and any consequential changes arising from or concerning the appeal.
6. The Society opposes in part the relief sought by the appellant, because the Plan must protect significant indigenous vegetation and habitat and maintain biodiversity and preserve values of outstanding and high natural character of the coastal environment, and the relief as sought will not achieve those outcomes. The Appellant's relief seeks to amend or delete provisions Forest and Bird supported in its submissions and/or the provisions appealed overlap with Forest and Bird's own appeal.
7. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated 31 January 2019

A handwritten signature in blue ink, appearing to read 'Sally Gepp'.

Sally Gepp

Counsel for the Royal Forest and Bird Protection Society of New Zealand Inc

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