## ENV-2018-CHC-243

## IN THE ENVIRONMENT COURT

**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 Dune

the Dunedin City District Plan

BETWEEN DIRECTOR-GENERAL OF

**CONSERVATION** 

Appellant

AND DUNEDIN CITY 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) lodged a submission and Further submission to the District 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 aspects of the appeal:

## a. Policy 10.2.3.2

- We oppose the appellant's relief sought.
- It is against the purpose and principles of the RMA to avoid all land uses in the Outstanding Natural Coastal Character (ONCC) and High Natural Coastal Character (HNCC) unless there were no adverse effects.
- We agree with the Reporting Officer that some land use and development activities, where they support, or do not detract from, natural character values are permitted in ONCC and HNCC. Such activities include farming and grazing.

## b. Rule 10.3.2.A

- We oppose the appellant's relief sought.
- We agree with the Hearing Panel that the exemptions listed in the Rule, which includes erection of fences, construction of tracks of no more than 2m wide, and clearing areas of manuka adversely affected by manuka blight, can involve clearing vegetation without compromising the values of an Area of Significant Biodiversity Value (ASBV).
- 4. Federated Farmers of New Zealand (Inc) agrees to attend mediation and/or dispute resolution in regard to these proceedings.

Dated the 31st of January 2019

Caroline Ryder Senior Policy Advisor Address for Service: Federated Farmers of New Zealand (Inc) PO Box 5242 Dunedin

Mobile: 027 475 5615

Email: <a href="mailto:cryder@fedfarm.org.nz">cryder@fedfarm.org.nz</a>