

**BEFORE THE ENVIRONMENT COURT
AT AUCKLAND
I MUA I TE KOOTI TAIAO O AOTEAROA
TĀMAKI MAKĀURAU**

ENV-2020-AKL-000087

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal under clause 14(1) of Schedule 1 to the Act

BETWEEN **HORTICULTURE NEW ZEALAND**

Appellant

AND **WAIKATO REGIONAL COUNCIL**

Respondent

**NOTICE OF BEEF+LAMB NEW ZEALAND LIMITED'S WISH TO BE A
PARTY TO PROCEEDINGS
29 September 2020**

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TO: The Registrar
Environment Court
Auckland

1. Beef+Lamb New Zealand Ltd (B+LNZ) wishes to be a party to the following proceedings:

Horticulture New Zealand v Waikato Regional Council
ENV-2020-AKL-000087.

2. B+LNZ made a submission about the subject matter of the proceedings.
3. B+LNZ has an interest in the proceedings that is greater than the interest that the general public has because:
 - (a) The proceedings seek relief that will impact on the natural and physical resources of the region.
 - (b) B+LNZ is a representative body that promotes sustainable farming practices and develops and implements programmes aimed at improving farming systems.
 - (c) The Appeal will impact farmers who B+LNZ represent and who rely on natural and physical resources to provide for their health and well-being.
4. B+LNZ is not a trade competitor for the purposes of s 308C or 308A Resource Management Act 1991.
5. B+LNZ is interested in all of the proceedings.
6. B+LNZ is interested in the following particular issues:
 - (a) Any relief sought that is inconsistent with its appeal *Beef+Lamb New Zealand v Waikato Regional Council* ENV-2020-AKL-99.
 - (b) Any relief sought that seeks or has the consequential effect of amending PC1 in respect of low intensity farming.

- (c) Any relief that seeks to amend the plan framework for Commercial Vegetable Production to the extent it impacts on the issues of interest pleaded above.
- 7. B+LNZ is neutral on the relief sought except to the extent pleaded below.
- 8. B+LNZ conditionally opposes the relief sought because:
 - (a) B+LNZ supports the findings of the Respondent that the Decisions version of PC1 provides for restoration and protection of the Waikato and Waipā Rivers and their tributaries, subject to the relief sought in its appeal.
 - (b) Any relief granted should be the most appropriate way to achieve the purpose of the Act, give effect to Te Ture Whaimana, the New Zealand Coastal Policy Statement, other relevant national policy statements (notably the National Policy Statement for Freshwater Management) and Regional Policy Statement, and implement the objectives and policies of the relevant plans, including by supporting and providing for a sustainable and strong rural sector in the Waikato Region that operates while restoring and protecting the Awa.
 - (c) PC1's approach to enabling low-intensity farming activities, including extensive drystock farms, enables people and communities to provide for their wellbeing while at the same time recognising the Awa are degraded and ensuring that there is no further degradation and providing a pathway for improvement in the short term and long term.
 - (d) To the extent the relief sought results or may result in amendments to PC1's approach to drystock farming it is opposed.
- 9. B+LNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



CP Thomsen

Counsel for s 274 party

Beef+Lamb New Zealand Ltd

29 September 2020

This notice was filed by **CHRISTOPHER PAUL THOMSEN**, solicitor for the party of the firm Fletcher Vautier Moore. The address for service of the above-named party is at the offices of Fletcher Vautier Moore, Solicitors, 265A Queen Street, Richmond, Nelson.

Documents for service on the party may be:

- (a) Posted to the solicitor at Fletcher Vautier Moore, Solicitors, P O Box 3029, Richmond, Nelson; or
- (b) Left for the solicitor at a document exchange for direction to DX WC71017, Richmond, Nelson; or
- (c) Transmitted to the solicitor by facsimile to (03) 543 8302 provided original documents are then posted to the solicitor; or
- (d) Sent by email to cthomsen@fvm.co.nz and cluisetti@fvm.co.nz provided original documents are then posted to the solicitor.

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.