

**IN THE ENVIRONMENT COURT  
AT WELLINGTON**

ENV-2016-CHC-000071

**IN THE MATTER** of the Resource Management Act  
1991 ("the Act")

**AND**

**IN THE MATTER** of an application for declarations  
under Part 12 of the Act

**BETWEEN** **ENVIRONMENTAL DEFENCE  
SOCIETY INCORPORATED**

Applicant

**AND**

**MACKENZIE DISTRICT COUNCIL**

Respondent

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**NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS**  
Section 274, Resource Management Act 1991

**Federated Farmers of New Zealand**

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To: The Registrar  
Environment Court  
WX11113  
Christchurch

I, Federated Farmers of New Zealand, wish to be a party to the following proceedings:  
ENV-2016-CHC-000071  
Environmental Defence Society Incorporated v Mackenzie District Council  
an application for a declaration.

I am a person who has an interest in the proceedings that is greater than the interest that the general public has. The grounds for saying that I come within this category are that:

Federated Farmers of New Zealand is a representative body representing farmers in New Zealand. The subject matter of the appeal is a matter of

interest for the farmers of the Mackenzie District, and they constitute a sector of the general public. Federated Farmers is in an appropriate position to represent that interest.

I am not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.

I am interested in all of the proceedings.

I am interested in the following particular issues:

All of the issues raised by the applicant in the application

I oppose the relief sought because:

With respect to Ground 8(d), significant, irreparable and inter-generational harm that is diminishing values of national and international importance in the Mackenzie District has not occurred and has not been caused by the Council's wrong reliance on Rules 12.1.1.g and 12.1.1.h;

With respect to Ground 8(f), the Council has not wrongly interpreted Rules 12.1.1.g and 12.1.1.h and the exemptions therein, has not mistaken its position in law;

With respect to Ground 8(g), the Council has not wrongly interpreted Rule 15.1.1 and the associated District Plan definitions.

I agree to participate in mediation or other alternative dispute resolution of the proceedings.



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Richard Gardner  
Solicitor  
Federated Farmers of New Zealand

2 December 2016

Address for service of person wishing to be a party:

Bob Douglas  
Regional Policy Advisor  
Federated Farmers of New Zealand  
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Contact person: Bob Douglas, Regional Policy Advisor

*Advice*

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