

IN THE MATTER of the Resource Management Act
1991

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

**NOTICE UNDER SECTION 274 OF INTENTION TO APPEAR BY THE
ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND INCORPORATED**

1 December 2016

To: The Registrar
Environment Court
Christchurch

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated ('Forest and Bird') wishes to be a party to the application by the Environmental Defence Society Incorporated for declarations under Part 12 of the Act.
2. Forest and Bird has an interest in the proceeding that is greater than the interest that the general public has. Forest and Bird is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991 ('RMA').
3. Forest and Bird is interested in all parts of the proceeding. Forest & Bird supports the application on the basis that:
 - a. The scale and rate of conversion of indigenous dryland vegetation to exotic pasture in the Mackenzie Basin is a matter of urgent national concern.
 - b. The indigenous vegetation clearance rules in the Mackenzie District Plan:
 - i. Are either being interpreted erroneously by the Mackenzie District Council, such that pastoral intensification (including oversowing and topdressing) is being treated as a permitted activity contrary to the relevant rules; or
 - ii. If correctly interpreted, are wholly inadequate to maintain indigenous biodiversity, protect significant indigenous vegetation and significant habitat of indigenous fauna, and do not give effect to the Canterbury Regional Policy Statement.
4. Forest and Bird agrees to participate in mediation or other alternative dispute resolution of the proceeding.

Dated: 1 December 2016



Peter Anderson/Sally Gepp
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Address for service of person wishing to be a party:

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