

**BEFORE THE ENVIRONMENT COURT / I MUA I TE KOOTI TAIAO O
AOTEAROA**

AT AUCKLAND

UNDER the Resource Management Act 1991

A N D

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

BETWEEN **WAIKATO REGIONAL COUNCIL**

(ENV - 2020 - AKL - 000089)

Appellant

WAIKATO REGIONAL COUNCIL

Respondent

**NOTICE OF WAIRAKEI PASTORAL LIMITED'S
WISH TO BE PARTY TO APPEAL**

29 SEPTEMBER 2020

Counsel instructed:
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SECTION 274 NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS BEFORE THE ENVIRONMENT COURT

**TO: THE REGISTRAR
ENVIRONMENT COURT
AUCKLAND**

WAIRAKEI PASTORAL LIMITED (WPL) wish to be a party to the appeal by the Waikato Regional Council against its decision on Proposed Plan Change 1: Waikato and Waipa River Catchments to the Waikato Regional Plan as amended by Variation 1 (**PC1**).

WPL:

1. Made a submission on PC1 in 2016;
2. Made a submission on Variation 1 to PC1 in 2018;
3. Made a further submission on PC1 as amended by Variation 1 in 2018; and
4. Lodged an appeal on PC1 on 8 July 2020.

WPL is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**Act**).

WPL is interested in the parts of the appeal relating to:

1. The calculation of stocking rate in Schedule C(1)(b)
2. The use of cattle age and weight as thresholds in Schedules C and D1
3. Amending the definitions to align with the Essential Freshwater Programme
4. The definition of Stock Unit

WPL supports the request to clarify the calculation of stocking rate in Schedule C(1)(b) and agrees with the rationale provided in the appeal.

WPL opposes the request to delete “older than 2 years or greater than 400kg lwt” from Schedules C and D1. There is no effects based rationale for restricting all cattle, regardless of age or weight, from grazing on pasture or forage crops in the winter months.

WPL opposes in part the request to align the definitions with those to be established through the Essential Freshwater programme. While WPL agrees with the desire to have definitions used consistently across all relevant planning documents, extreme care must be taken when amending definitions given the critical role definitions play when interpreting and applying the rules and other provisions.

WPL supports the request to amend the definition of “Stock Unit” and agrees with the reasoning provided in the appeal.

WPL agrees to participate in mediation or other alternative dispute resolution of the proceedings.

WAIRAKEI PASTORAL LIMITED, by its counsel:



Signature:
Date:

B S Carruthers
29 September 2020

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TO:

Registrar, Environment Court, Auckland

AND TO:

The Respondent