

**IN THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

ENV-2019-WLG-000133

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of appeals under Clause 14(1) of the
First Schedule of the Act in relation to
Proposed Natural Resources Plan for
Wellington Region

BETWEEN **Beef+Lamb New Zealand Ltd**

Appellant

AND **Wellington Regional Council**

Respondent

**NOTICE OF WISH TO BE
PARTY TO PROCEEDINGS PURSUANT TO
SECTION 274 RESOURCE MANAGEMENT ACT 1991**

To: The Registrar
Environment Court
Wellington

1. Horticulture New Zealand ("**HortNZ**") wishes to be a party pursuant to section 274 of the Resource Management Act 1991 ("**RMA**") to the following proceedings:
Beef+Lamb New Zealand Ltd v Wellington Regional Council **ENV-2019-WLG-000133** being an appeal against decisions of the Wellington Regional Council on Proposed Natural Resource Plan for Wellington Region
2. HortNZ made submissions and further submissions on Proposed Natural Resources Plan for Wellington Region.
3. HortNZ also has an interest in these proceedings that is greater than the general public as it represents interest groups in the community that are likely to be adversely affected by the proposed relief sought by the Respondent
4. HortNZ is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
5. The parts of the proceedings HortNZ is interested in are:
 - a) AP 8a) Definition Erosion prone land
 - b) AP 8b) Table 3.4 (O25)
 - c) AP 8c) Nutrient allocation framework
6. The parts of the proceedings HortNZ is interested in, including the particular issues and whether HortNZ supports, opposes or conditionally opposes the relief sought are set out in the attached table.
7. HortNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



Jordyn Landers
Environmental Policy Advisor
Natural Resources and Environment
Horticulture New Zealand
9 October 2019

Address for service of the Appellant:

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ATTACHMENT 1

Appeal ref	Provision Appealed	Scope for s274	Support / Oppose	Reasons
AP 8a)	Definition Erosion prone land	HortNZ made a further submission opposing the Beef+Lamb submission S311/007 seeking changes to the definition of erosion prone land.	Oppose	The appellant seeks to include all land that has an erosion (e) classification under the Land Use Capability soil classification system as Erosion prone land regardless of slope. The intent of the rules and definition as proposed is effects-based as it is linked to slope.
AP 8 b)	Table 3.4 (O25)	HortNZ made a submission seeking to amend Objective 025 Tables 3.4-3.8 to include simpler numerics and narratives as the interim measures pending the Waitua plan processes for specific areas.	Support in part	The appellant seeks to amend the numeric freshwater objectives to reflect the natural character of waterbodies and their life supporting capacity, in the context of geology, catchment characteristics and surrounding land use. The appellant is concerned that the freshwater objectives should seek to maintain current state where appropriate and improve water quality where required, as identified in the waitua process. HortNZ supported reliance on the outcomes of the waitua process so supports the relief sought by the appellant and to ensure that the freshwater objectives are realistic and related to the current state.
AP 8c)	Principles of nutrient allocation	HortNZ made a further submission opposing in part the Beef+Lamb submission S311/002 seeking inclusion of a nutrient allocation policy based on a set of principles included in the submission	Oppose in part	The direction of national policy on nutrient allocation is different to that sought by the appellant. While HortNZ accepts some of the principles as being appropriate it has concerns about the natural capital of soils being the primary consideration when establishing an allocation mechanism for nutrient loss as it does not retain flexibility of land use. The use of good management practice is supported.