

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

**ENV-2018-CHC-000030**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of appeals pursuant clause  
14 of Schedule 1 to the Act  
in relation to the Decision  
on the Proposed Southland  
Water and Land Plan

**BETWEEN** **WILKINS FARMING  
COMPANY LIMITED**

**Appellant**

**AND** **SOUTHLAND REGIONAL  
COUNCIL**

**Respondent**

---

**NOTICE OF PERSON'S INTENTION TO BECOME A PARTY TO PROCEEDINGS  
PURSUANT TO SECTION 274 OF THE RESOURCE MANAGEMENT ACT 1991**

**DATED 22 JUNE 2018**

---

---

 **Simpson Grierson**  
Barristers & Solicitors

Simpson Grierson  
J G A Winchester  
Telephone: +64-4-924 3503  
Facsimile: +64-4-472 6986  
Email: james.winchester@simpsongrierson.com  
DX SX11174 PO Box 2402  
SOLICITORS  
WELLINGTON 6140

## NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS

*Section 274, Resource Management Act 1991*

**To:** The Registrar  
Environment Court  
Christchurch

1. Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Oraka Aparima (collectively Ngā Rūnanga), and Te Rūnanga o Ngāi Tahu (collectively Ngāi Tahu) (collectively, **Ngā Rūnanga**), wish to be a party to the above proceeding.
2. Ngā Rūnanga made a submission about the subject matter of the proceedings.
3. In addition, Te Rūnanga is the iwi authority over the takiwā of Ngāi Tahu which includes all of the area covered by the Southland Regional Council. Te Rūnanga is comprised of 18 Papatipu Rūnanga including Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua and Te Rūnanga o Oraka Aparima within whose takiwā the Southland region lies. In that respect, Te Rūnanga has an interest in the proceedings greater than the general public.
4. Ngā Rūnanga are not trade competitors for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**RMA**).
5. Ngā Rūnanga are interested in part of the proceedings.
6. The parts of the proceedings Ngā Rūnanga are interested in are:
  - (a) **Policy 42 Consideration of water permit applications** - Amending Policy 42 to read "If a groundwater management zone is within the last 10% of its primary groundwater allocation limit, then existing consent holders should be offered consent renewal options before further allocating groundwater to new applicants".
  - (b) **Appendix L.5 Groundwater Allocation** – Basing groundwater restrictions should be based on a transparent and consistent formula applied fairly across all ground water zones.

7. Ngā Rūnanga opposes in the relief sought by Wilkins Farming Co. because:
- (a) The proposed plan was intended to “hold the line” in terms of the quality of the region’s environment and freshwater resources. Ngā Rūnanga is concerned that the amendments to the groundwater provisions will not achieve this.
8. Ngā Rūnanga agrees to participate in mediation or other alternative dispute resolution of the proceedings.

**DATED** at Wellington this 22 day of June 2018



---

J G A Winchester  
Counsel for Ngā Rūnanga

**Address for service of person wishing to be a party:**

Simpson Grierson  
HSBC Tower  
Level 24, 195 Lambton Quay  
Wellington  
P O Box 2402  
Wellington 6140  
Attention: James Winchester

Email: james.winchester@simpsongrierson.com  
Telephone: 0-4-924 3503  
Facsimile: 0-4-472 6986