

**IN THE ENVIRONMENT COURT AT  
AT CHRISTCHURCH**

**ENV-2025-CHC-000110**

**I TE KOTI TAIAO O AOTEAROA  
KI ŌTAUTAHI**

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

**AND**

**IN THE MATTER** of an appeal under clause 14(1) of the First Schedule of  
the Act and pursuant to Section 274 of the Act

**BETWEEN** **BULLER CONSERVATION GROUP**

Appellant

**AND** **THE TE TAI O POUTINI PLAN COMMITTEE**

Respondent

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**NOTICE OF FEDERATED FARMERS OF NEW ZEALAND  
INCORPORATED'S WISH TO BE PARTY TO PROCEEDINGS**

2 February 2026

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**TO:** The Registrar of the Environment Court at Christchurch

**AND TO:** The Buller Conservation Group (**Appellant**); and  
the Te Tai o Poutini Plan Committee (**Respondent**).

1. Federated Farmers of New Zealand Incorporated (**Federated Farmers**) gives notice pursuant to section 274 of the Resource Management Act 1991 (**RMA**) that it wishes to be a party to the following proceedings:

*The Buller Conservation Group v Te Tai o Poutini Plan Committee*  
ENV-2025-CHC-000110 (**Appeal**).

2. Federated Farmers made a submission (submitter number S524) and further submission (further submitter number 103) about the subject matter of the proceedings.
3. Federated Farmers has an interest in the proceedings that is greater than the interest that the general public has. The subject matter of the proceedings directly impacts the ability of farmers to use their land. Federated Farmers is a primary sector organisation that represents the interests of farmers and rural communities.
4. Federated Farmers is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
5. Federated Farmers is interested those parts of the proceedings relating to Te Tai o Poutini Plan (**the Plan**):
  - (a) the definition of Riparian Margin;
  - (b) Strategic Direction for Land-Based Primary Production;
  - (c) Ecosystem and Indigenous Biodiversity provisions (policy ECO-P8, and rules ECO-R3 and ECO-R8);
  - (d) Natural Character (rule NC-R1);

- (e) restrictions in 'unmodified areas' of the Coastal Environment (policy SUB-P6(e) and rules SUB-R6 and CE-R4); and
  - (f) restrictions on building in the Coastal Environment (rule CE-R5).
6. Federated Farmers conditionally oppose the relief sought by the appellant because:
- (a) While proposed wording has been provided in relation to some appeal points, for other provisions insufficient detail has been provided as to the relief sought. This includes the absence of any proposed wording capable of assessment.
  - (b) In relation to 'unmodified areas', the relief sought seeks use of a subjective and undefined term in a rule. This would add significant uncertainty to its interpretation and application. In relation to the associated policy, the relief seeks to remove the ability to remedy or mitigate effects, leaving only an 'avoid' management response which would create unwarranted barriers for land uses.
  - (c) Other relief sought will result in overly restrictive outcomes for rural land use by increasing regulatory controls in a manner that is likely to shift everyday activities into consenting pathways, with associated cost, delay, and administrative burden.
  - (d) The relief requested by the Appellant is inconsistent with Part 2 of the RMA, as it does not appropriately provide for the sustainable management of natural and physical resources, including enabling the appropriate use, development, and subdivision of those resources to provide for the social, economic, and cultural wellbeing of people and communities.

7. Federated Farmers agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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**K L Sannazzaro**  
Senior Policy Advisor

**Dated:** 2 February 2026

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**Advice**

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