

**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** **THE ROYAL FOREST AND BIRD PROTECTION  
SOCIETY OF NEW ZEALAND INCORPORATED**

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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**FEDERATED  
FARMERS  
OF NEW ZEALAND**

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

**AND TO:** The Royal Forest and Bird Protection Society of New Zealand Incorporated (**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 Royal Forest and Bird Protection Society of New Zealand Incorporated 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 in the following parts of the proceedings:
  - (a) Appeal points 5 and 8, relating to the definitions of Lake and Riparian Margin;
  - (b) Appeal points 9, 10, 13 and 14, relating to Strategic Direction;

- (c) Appeal points 3, 46, 50, 51, 52, 53, 56, 57, 58, 59, 60, 63, 65, 68, 72 and 125, relating to Ecosystems and Indigenous Biodiversity provisions;
  - (d) Appeal points 76 - 80, relating to Natural Character and the Margins of Waterbodies;
  - (e) Appeal points 93, 94, 95, 97, 98 and 101, relating to the Coastal Environment;
  - (f) Appeal points 117, 118 and 119, relating to the Rural Zone;
6. Federated Farmers conditionally oppose the relief sought because:
- (a) Amendments to waterbody definitions and Strategic Direction provisions influence the interpretation and application of multiple objectives, policies, and rules affecting rural land use, and therefore have the potential to materially affect the certainty, scope, and operation of provisions applying to farming activities.
  - (b) The relief seeks a series of detailed amendments, some of which may be appropriate in principle or in isolation, but which collectively risk increasing prescription and complexity without a clear or proportionate improvement in planning outcomes.
  - (c) In relation to Indigenous Biodiversity, the relief seeks greater restriction on the areas able to be cleared and changes to the application of rule ECO-R1. This will result in overly restrictive outcomes for rural land use by increasing regulatory controls in a manner that is likely to shift everyday farming and land management activities into consenting pathways, with associated cost, delay, and administrative burden.

While greater clarity regarding the relationship between the rules may be appropriate, it would be inappropriate and unworkable to

impose rule ECO-R1 general area limits on indigenous vegetation clearance undertaken that is expressly provided for under rules ECO-R2 to ECO-R6.

For example, applying the ECO-R1 limits to maintenance of existing lawful structures and activities as expressly provided for under rule ECO-R3, would require resource consent for routine maintenance, such as fencing, water supply pipelines, and grazing activities, particularly on larger farms.

- (d) In relation to Natural Character and the Margins of Waterbodies, the relief seeks to reduce certainty, and the policy direction that currently provides for necessary activities to occur within riparian margins.
- (e) In relation to the Coastal Environment, the relief similarly seeks to reduce certainty and the policy direction that currently provides for necessary activities to occur, in a manner that appears to be inconsistent with the associated rule framework.
- (f) In the Rural Zone, the relief seeks the introduction of a new objective and policy for natural values, for which no wording has been provided. These provisions would be in addition to an already comprehensive suite of objectives and policies in Part 2 - District Wide Matters. Locating additional natural values provisions within the Rural Zone chapter appears inconsistent with the National Policy Standard 2019 framework. The relief also seeks to amend an existing policy in a manner that appears inconsistent with the relevant rules.

8. 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.