

BEFORE THE ENVIRONMENT  
COURT I MUA I TE KOOTI TAIAO  
OAOTEAROA

IN THE MATTER of the Resource Management Act  
1991

AND of appeals under Clause 14 of the  
First Schedule of the Act

BETWEEN **Robert Grant – Otamita Valley**

AND **SOUTHLAND REGIONAL COUNCIL**

Respondent

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**SECTION 274 NOTICE**

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To: The Registrar  
Environment  
Court  
Auckland, Wellington and Christchurch

1. Wilkins Farming Co Ltd (Wilkins Farming) wish to be a party to this proceeding being an appeal against the proposed Southland Land and Water Plan.
2. Wilkins Farming is an entity which has an interest in the proceedings that is greater than the interest that the general public has because it is a large Southland rural landowner and farmer and it is also an entity which made a submission about the subject matter of the proceeding.
3. Wilkins Farming is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
4. Wilkins Farming is interested in following Rule 20 (a) (iii) (1) Intensive Winter Grazing Area. We support the relief sought to delete the words “or 100 hectares, whichever is the lesser”.
5. Wilkins Farming support this relief because the existing stance unjustifiably penalizes properties greater than 667ha. This is inappropriate and does not necessarily promote the objective of improved water quality and reduced contaminant loss. It is a misinterpretation of ‘holding the line’ on water quality. The rule is arbitrary and impractical, it will create unnecessary cost and compliance while compromising land use options. This could compromise land values when compared to smaller farms or to an identical farm in adjacent Otago which does not have such restrictions attached.
6. Wilkins Farming is interested in following the Rule 25 (a) (iv) Cultivation Slope. We support the relief sought so that “20 degrees” is replaced by “30 degrees”. ~~We support this relief because the existing stance unjustifiably penalizes properties greater than 667ha.~~
7. Wilkins Farming supports the relief because the existing stance is unjustifiably restrictive as it does not allow for flexibility or sensible management discretion to be applied in a local context. The risks of

nutrient loss exist regardless of gradient if a system is not managed appropriately. The gradient is one contributing factor to consider among many and applying this overly restrictive rule will cause perverse outcomes. This will result in a loss in productive land which will limit the winter grazing area for the province, increasing stock concentration elsewhere on the farms. This will create unnecessary cost and compliance while compromising land use options. This could compromise land values when compared to an identical farm in adjacent Otago which does not have such restrictions attached.

8. Wilkins Farming agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Signed for and on behalf of Wilkins Farming Company Limited

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Sean Wilkins  
Manager

Date: 22-6-18

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