

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-26 to 50

Under the Resource Management Act 1991 (**RMA**)

In the matter of appeals under clause 14 of Schedule 1 of the RMA
relating to the proposed Southland Water and Land
Plan (**pSWLP**)

Between **Federated Farmers of New Zealand**
Appellants in ENV-2018-CHC-40, and section 274 party to appeals:

ENV-2018-CHC-39 Alliance Group Limited;
ENV-2018-CHC-29 Aratiatia Livestock Limited
Ballance AgriNutrients Limited
Buckingham, Owen
ENV-2018-CHC-44 Campbell's Block Limited
ENV-2018-CHC-48 Chartres, Peter
Cockburn, Grant and Rachel
Dairy Holdings Limited
ENV-2018-CHC-36 Director General of Conservation
DR and JAE Pullar Limited
English, Hamish
Fairlight Station Limited
ENV-2018-CHC-27 Fonterra Co-operative Group Limited
ENV-2018-CHC-31 Gore District Council and others
ENV-2018-CHC-45 Grant, Robert
Gunton Farms Limited
ENV-2018-CHC-28 Horticulture NZ
Invercargill Airport Limited
ENV-2018-CHC-38 Meridian Energy Limited
Mt Linton Station Limited
Oil Companies
Rayonier NZ Limited
ENV-2018-CHC-50 Royal Forest and Bird Protection Society of
NZ Inc
ENV-2018-CHC-37 Southland Fish and Game Council
ENV-2018-CHC-42 Stoney Creek Station Limited
ENV-2018-CHC-47 Te Runanga o Ngai Tahu and others
ENV-2018-CHC-43 The Terraces Limited
ENV-2018-CHC-26 Transpower NZ Limited
Waiau River Liaison Committee
Waiau Rivercare Group

And **Southland Regional Council (Environment Southland)**

Respondent

Will Say statement of Peter Wilson

29 October 2021

Introduction

- 1 My full name is Peter Gordon Wilson
- 2 I am a senior planner with Federated Farmers of New Zealand Inc.
- 3 My qualifications and experience will be set out in my evidence in chief.
- 4 I confirm that I have read the Code of Conduct for expert witnesses in the Environment Court's Practice Note 2014. I confirm that I have complied with the practice note when preparing this statement and the opinions I express are within my area of expertise and are my own unless stated otherwise. I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

Scope of brief

- 5 The Court's Record of Pre-Hearing Conference Timetable Direction for Topic B issued 22 October 2021 directed witnesses to prepare will-say statements in respect of the Topic B matters remaining unresolved.
- 6 Federated Farmers has a number of unresolved topics remaining in the Topic B5 farming matters, namely:
 - (a) Policy 18(2) – stock exclusion, and subsequent and consequential changes to Rule 70
 - (b) Rule 20 – farming, in particular, the provisions for intensive winter grazing, and buffers for farming activities.
 - (c) Rule 35A – Feed pads/lots
 - (d) Rule 52A – The Manapouri hydro-electric generation scheme
 - (e) Definitions of cultivation, minimum cultivation, feedpads/lots
- 7 My Will Say statement is limited to the issues that relate to those policies.

Summary

- 8 For intensive winter grazing and stock exclusion matters the proposed policies and rules predate the adoption of the National Environmental Standard-Freshwater, and the s360 Stock Exclusion Regulations. There are inconsistencies between the

proposed plan and the national provisions. Some of these are easily resolved through adoption of the national requirements, other resolution requires the testing of the relative stringency and leniency between the proposed plan and the national instruments in order to properly reflect the national instrument requirements within the proposed plan. Resolution on these planning technicalities is best reached at planning expert caucusing.

- 9 Furthermore, changes may be made to the national instruments ahead of the hearing, and whilst the content of these cannot be known in advance, my planning evidence will consider mechanisms by which these could be tested and or incorporated.
- 10 I will provide similar evidence drawing on national policy instrument direction on definitions for feedpads/lots, cultivation, and the adoption of minimum tillage standards for higher slope land.
- 11 I will provide evidence on the need for a restricted discretionary activity status for the Manapouri Power Scheme in Rule 52A, rather than the currently existing controlled activity status.

Peter Wilson

29 October 2021