

**UNDER** the Resource Management Act 1991 ("RMA")

**IN THE MATTER** of appeals under Clause 14 of the First Schedule to the RMA in relation to the decision on the proposed Southland Water and Land Plan

**BETWEEN** **WILKINS FARMING COMPANY LTD**  
**Appellant / s274 Party**

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

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**MEMORANDUM OF COUNSEL CONFIRMING CHANGES BEING PURSUED BY  
WILKINS FARMING COMPANY LTD**

**7 JUNE 2022**

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**MAY IT PLEASE THE COURT**

1. All parties have been directed to file a memorandum by 7 June 2022 identifying any errors in the Consolidated Plan.
2. Wilkins is pursuing its request to change the permitted activity standard for Intensive Winter Grazing to read:

*intensive winter grazing does not occur on more than  
15% of the area of the landholding.*
3. Until scope is established for the proposed changes to Rule 20A(a)(i), it would be more appropriate for the Wilkins request to read as above.
4. Until scope is established for the proposed introduction of the slope control in Rule 20A(a)(ii), it would be more appropriate for Wilkins to be noted as seeking the removal of Rule 20A(a)(ii).
5. In the event there is scope to reduce the area control to 10% and/or to introduce the slope control and the Court decides there is merit to do so, Wilkins seeks the version of Rule 20A(aa) recorded in the Consolidated Plan as being requested by Federated Farmers. The heading should note it is "if changes sought to (a)(i) and (a)(ii) not accepted."

**DATED** 7 June 2022



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B S Carruthers  
Counsel for Wilkins Farming Co Ltd