

BEFORE THE ENVIRONMENT
COURT I MUA I TE KOOTI TAIAO O
AOTEAROA

IN THE MATTER of the Resource Management Act
1991

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

BETWEEN **Te Anau Downs Station**

AND **SOUTHLAND REGIONAL COUNCIL**

Respondent

SECTION 274 NOTICE

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 part of the proceeding Rule 20(a)(iii)(1) – Grazing not occurring on >15% of landholding or 100ha. 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 part of the proceeding Rule 70 (e.) – Stock exclusion from water bodies. We support the relief sought:

Farm/stock type	Land slope (as classified by the LRI slope dataset)		
	Plains (0 - 3°)	Undulating/rolling land (>3-15°)	Steeper land (>15° and over)
Beef cattle and deer	<p>All water bodies from 1 July 2025 All water bodies over 1 metre wide from 1 July 2030, unless the average stocking rate on the land directly adjacent to the water body is less than 6 stock units per hectare.</p>	<p>All water bodies over 1 metre wide from 1 July 2030, unless the average stocking rate on the land directly adjacent to the water body is less than 6 stock units per hectare.</p>	
All water bodies where break feeding occurs from 1 July 2022.			

7. We support this relief because this is allowing for sensible discretionary management that will not have statistically significant impacts on water quality and will mitigate adverse social or economic effects. The existing rule proposed is not practical in consideration of the requirement to fence off extensive areas of creeks and rivers in the 0-3 degree slope bracket. The huge cost of fencing will render extensive deer or cattle farming in these regions uneconomical, it will render productive land unproductive and the fences will be impractical to maintain with the inevitable flooding damage. The fenced off areas will become a breeding ground for weeds and pests requiring mechanical or chemical control posing further environmental risk.

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

Date: 22-6-18

Address for service of person wishing to be a party: 1018 Waipounamu Road, RD6 GORE 9776.

Telephone: 03 2016 246

Email: sonofray@wilkinsfarming.co.nz