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Notes to Plan change 1 Block 2 hearing May 27th 2019.

We have made a number of submission points. Most are related directly to our own property at 1149 Honikiwi Road, Otorohanga, and the way the plan change will impact that.

One is of more general concern which we will address first.

1. This concerns restrictions on future land use changes (3.11.5.7 on p45)

Rapidly growing population both in NZ and globally is creating increased demand for food. Food should be being produced **firstly** as close to centres of population as possible and **secondly** on the most fertile soils, so that inputs, transport requirements and therefore emissions are all minimised. Costs will also be kept down.

There are in the Waikato catchment, tracts of land of high fertility, flat or gentle contour which are not currently used intensively but which would easily support the production of food eg vegetables. The plan change rules should not make it difficult for owners of such land to make changes from low intensity use such as grazing a few horses, to market gardening. As food requirements increase and transport impacts need to be lessened to mitigate climate change, it will make sense to put such land into food production. Under the rule in the proposed plan change such change will require resource consent.

We suggest the use of the Land Capability Framework which enables land to be classified according to its capability. Changes of use of land which are within its Land Use Capability classification should be permitted.

It is of great importance that NZ's own security of food supply is ensured. Tricky rules which make it difficult to, or prevent using fertile, highly capable land to grow our food, must not be allowed to stand in the way of that. We do not want NZ to end up dependent on food imports.

Now to our other submission points:

1. We've made two points about slope. The first points out **inconsistencies within the proposed rules regarding property size and grazing slopes steeper than 15 deg.**

We simply now ask the question: Why should it not be OK to graze slopes steeper than 15 deg if your property is 20.1ha but it is OK if your property is 19.9ha?

The second point questions the use of 15 deg as a threshold for grazing or not grazing. Apart from the fact that we have not found any reference to scientific evidence within the proposed plan change for the use of this figure, we maintain that slope alone is a blunt tool to determine whether or not land is suitable to be grazed.

We refer to the Land Use Capability Framework... a system of land classification used since the 1950s throughout NZ and revised in 2009... which classifies land according to its capability for long term sustained use. It takes into account slope, erodibility, wetness, climate, aspect, soil type.

It is surprising to us that other than a footnote on p.52 there is no reference in the proposed plan change to this Framework.

A few years ago we began a programme of work under the Waipa Catchment Plan as we are within the Moakurarua Priority sub-catchment. The first step of this was the writing of a Land Use Capability Assessment and Soil Conservation recommendations. Garth Eyles walked our property and produced a fine scale map which identified different units according to their Land Use Capability. His overall description of the property was of "a block dominated by 5ha of retired native bush with most of the remainder being easy hill country."

Generally that "easy hill country" is classified as Land Use Capability class 6. "Suitable uses include grazed pasture, tree crops and/or forestry, and in some cases vineyards. Erosion is commonly the dominant limitation but it is readily controlled by appropriate soil conservation and pasture management." (quote from LUC handbook)

So what are those management strategies??

- Not grazing overly heavy stock. Sheep or young cattle are better suited than heavy breeding cattle.
- Retiring steeper slopes where aspect means that they remain wet in winter and so become overly prone to erosion by grazing .
- Stocking sensibly so that animals are not confined.
- Not over grazing so as to leave bare patches.
- Space planting to help reduce wetness and likelihood of slipping.

The crude rule about 15 degrees takes no account of stock type that are grazed. Steeper slopes can be well managed if lighter animals are grazed. We have observed this on our own property where in the first few years we owned it we leased land to neighbouring dairy farmers who ran R2 heifers and at times dry cows. These heavy animals did cause soil damage and since we have changed to running only young cattle from weaning through to 16-18 months this is no longer the case.

The rule about grazing slope needs to be far more refined. It needs to consider all the other factors considered within the LUC framework and stock type as well as stock numbers. The weight and type of animal is important here as well as their numbers.

As the rule around slope is written, and if our property were slightly larger, we would not be allowed to graze it. So what would we do? The LUC framework for Class 6 suggests such land is no more suitable for forestry than it is for grazing. The damage forestry causes at harvest and post-harvest is well known. We are of the firm belief that less sediment will be being lost to the catchment under grazing than would be the case under forestry.

| LUC Class | Arabic cropping suitability ¹ | Pastoral grazing suitability | Production forestry suitability ² | General suitability |
|-----------|--|------------------------------|--|---------------------|
| 1 | High | High | High | Mixed use land |
| 2 | ↓ | ↓ | ↓ | |
| 3 | | | | |
| 4 | Unsuitable | | | Low |
| 5 | | Unsuitable | Unsuitable | |
| 6 | | | | Unsuitable |

¹ Includes vegetable cropping (see Section 3 in Explanatory notes)

² LUC Class 6 with a water access restriction, and also some in low rainfall areas (i.e. hill country) or those occurring on shallow soils (and) are normally not suited to production forestry

Figure 8: Increasing limitations to use and decreasing versatility of use from LUC Class 1 to LUC Class 8.

The proposed plan change document is clear on what won't be possible to do but is silent on what realistic possibilities are for properties of contour such as ours.

2. Four of our submission points relate directly or indirectly to stocking rates.

a) **Definition of stock unit.** A system is needed which recognises that animals grow gradually and do not suddenly change from one figure to another at a certain age. We have suggested a system of liveweight accounting be used to avoid the nonsense suggested in the table on pages 84-5 that a steer suddenly changes from 2.7 to 5.8 between the ages of 11.5 and 12 months. What figures are used as stock units affects the calculation of stocking rate. And that can make the difference between a permitted activity or not and thousands of dollars difference in compliance costs to the landowner.

b) **Definition of stocking rate.** There needs to be clarity about what is meant. Is it the numbers of SU on the property at any one time? Or averaged over the year? Depending on what is meant, and taking figures for our property a couple of years ago when it was leased, sometimes it fell into the permitted category and at other times did not. If not then we would become subject to expensive compliance costs, likely to be more than we earned from lease fees.

c) **Permitted stocking rates need to be matched to Land Capability.**

Permitted stocking rates need to be set according to the carrying capacity of the land. This is a complex function of many factors which include: grass growth, pasture species, aspect, soil type, rainfall, climate, slope. This varies from property to property. The safe, environmentally sound stocking rate for a permitted activity needs to be determined on a case by case basis and not arbitrarily set at 6 SU/ha.

For example, our property is hilly and north facing. It is easily able to support a stocking rate above 6 SU/ha because grass grows well. Over the hill, facing south with similar soils and slope the land will carry less than 6 SU/ha.

Land which is capable of carrying a higher stocking rate than it does will result in uneaten, rank grass which will decay and contribute nutrients to the soil and nutrient run off to waterways. A higher permitted stocking rate should be allowed where the factors which contribute to a higher carrying capacity are favourable and without consequent negative environmental impacts.

Growth of weeds such as gorse and blackberry will also result from understocking. Costs of weed control will increase, further hampering the ability of the farmer to make a profit and be able to continue to farm.

- d) Referring to 3.11.5.1 on page 39 **definition of "grazed land"**. Without reiterating the figures in our submission, in our case a significant difference results from calculating stocking rate over the whole property vs over the pasture paddocks. There is no definition in Part C of "grazed land". There needs to be. If the rate is calculated over only the pasture then in our case we are given no credit for the mitigation steps which we have taken, many at our own cost, (retirement of steep slopes and wetlands and bush areas). We have sought clarity from WRC staff about the interpretation of the term "grazed land". Their opinions tended towards the understanding that the definition should be for the whole property not just the area that is grazed.

3. Enterprises operating over more than one property.

What we've said in our submission related to a previous lease arrangement we had on our land. This has changed as we are not currently leasing our land but operating it ourselves in conjunction with a neighbour. What we say about responsibility for compliance needing to rest with the lessee still stands.

But we want to speak to the general situation of otherwise compliant activity operating over more than one property regardless of whether land is leased or not.

If what you're doing on one property is classed as "permitted" and what you're doing next door or down the road is also "permitted" (except for the fact that your activity runs over the two properties) then the activity should be classed as "permitted".

eg We now share animals with our neighbour across the road who has 2ha. We also now own another small block down the road just over 2ha. If our stocking rate calculated in proportion to each property falls into the permitted category for each property, then the fact that we rotate the animals around the three properties shouldn't make it discretionary and render us liable for all the associated compliance costs.