

IN THE MATTER of the Resource Management Act 1991
AND
IN THE MATTER of the hearing of submissions on Proposed
Plan Change 5 (Nutrient Management and
Waitaki Sub-region) to the Canterbury Land
and Water Regional Plan

BY **NATHANIEL SMALL**

AND **WAITAKI IRRIGATORS COLLECTIVE
LIMITED**

Submitters

TO **CANTERBURY REGIONAL COUNCIL**

Local authority

STATEMENT OF EVIDENCE OF NATHANIEL JAMES SMALL

Dated: 21 July 2016

Prudence Steven QC
Canterbury Chambers
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INTRODUCTION

1. My name is Nat Small. I am a sheep, beef, and cropping farmer living in the Hakataramea Valley. I am an active member of the local community, and I am a member of the Waitaki Independent Irrigators Incorporated Society ("**WIII**"), which I also sit on the committee of.

SCOPE OF EVIDENCE

2. My evidence will discuss the following:
 - (a) my farming operation;
 - (b) the implications and effects of the proposed Plan Change 5 in the Hakataramea.

MY FARMING OPERATION

3. My family farm is 4,500 hectares of land on the West side of the Hakataramea River. The farm has been in our family since the 1950s. My farm is currently dryland, but I hold four water permits that will allow me to irrigate in the future once issues relating to the use of storage water have been resolved.
4. I have operated a no-till practice since the early 1990s and a system of farming full retention of standing straw in our cropping operation since 2007.
5. Under the operative Land and Water Regional Plan, my farm is located within an orange zone. I have run the OVERSEER programme to determine what my Nitrogen baseline figure is, and it is 7kg/ha/year.
6. My water permits have conditions attached to them that require me to have an auditable Farm Environment Plan. There are also comprehensive water quality conditions relating to fencing, riparian management, and shelter belts. These will have to be complied with when I give effect to my water permits.
7. Under the Proposed Plan, the majority of my farm is in the 'Hakataramea Flat Zone' with a small percentage in the 'Hakataramea River Zone.'

PLAN CHANGE 5

8. I have been an active participant in the Hakataramea catchment group established by Environment Canterbury since 2013. The community came together many times to discuss our values and the outcomes we sought for the catchment. It was my

understanding that the outcome of this process was that people would continue to be able to farm as they had been, without complex rules and multiple consents being imposed on them, provided they were implementing good management practices on farm.

9. Good management practices should incorporate a range of practices with a focus on outcomes, not just determined according to modelled nitrogen leaching rates. This is particularly important for the Hakataramea, as phosphorous and the sediment that carries it through wind-blown erosion are a large source of nutrients.
10. However, the Plan as drafted is extremely complex and difficult to interpret without continually obtaining expert advice. Unlike dairy farming or intensive coastal stock farming, operating a large extensive mixed farm in the Hakataramea has massive variation in stocking patterns from season to season and year to year. This makes numbers generated by OVERSEER and in turn the Farm Portal is very difficult to use with any accuracy or certainty.
11. During the community process, a map was used to identify different classifications of land use and capability. It now seems that this map has been used as a tool to draw lines to promote the 'consent to farm' philosophy, which was not what the community had anticipated or agreed to. Morton Stream, which has been included in "near River" is no different and somewhat less alluvial than other tributaries in the Haka. Below is a photo of soil clay base and rock starter.



12. The Plan requires even extensive farms to gain a resource consent in order to have over 20 hectares of dryland green feed for cattle. This is totally unrelated to overall farm size and seems unfair for those where twenty hectares is such a small proportion of their total operation. For example:
- 20ha of a 200ha property is 10% of the land
 - 450ha of a 4500ha property is 10% of the land
 - 225ha of a 4500ha property is 5% of the land
 - 90ha of a 4500ha property is 2% of the land.
13. Green feed is often grown in large areas in the Hakataramea with very low yields due to climatic conditions. But when conditions are right the crop can end up beyond the needs of the farmer's own stock.
14. I do not understand how the transfer of N from 90% of the land in the Hakataramea to our waterways has been determined. How often is the soil moisture at a level that it can travel past the root zone and then move through tight clays to ground water (of which there is very little known to exist)? Other than in areas of alluvial gravels (being mainly only in the riverbed) or maybe under intense irrigation this is of any issue in the Hakataramea.
15. Farming in the Hakataramea means farming around challenging climatic conditions. Systems need to be flexible to allow them to be responsive to seasonal changes as often this will be there are the only profitable opportunities. Essentially, the community believed the Plan would allow such "wriggle room", particularly for those leaching very low levels of nitrogen. However, the proposed Plan as drafted actually locks in practices and does nothing to encourage flexible farming.
16. The community had requested that water quantity allocation issues be addressed through this Plan Change process, but these have been put aside. Future use of water has, to a certain extent, been done away with anyway by the proposed Rule Framework removing the "wriggle room". If water storage was available to most farms with extensive irrigation with appropriate uses, it would be a great benefit to farms and their environment by improving soil cover.

CONCLUSION

17. I request the following changes to the Plan:

- (a) Morton stream to be removed from the near river zone.
- (b) Flexible cap on N so further water harvesting and irrigation can be done on appropriate soils.
- (c) Consent requirement (if any) appropriate for property size for green feed but good management practice required.
- (d) It is extremely important for the farms in the Hakataramea to remain profitable - this could easily be taken away by the "tight lid" method. With respect to climate change, changing technology, and economics this Plan appears to have little consideration for future growth and true protection of the environment.

Nathaniel Small

22 July 2016