

Tabled at Hearing 18/9/2014.
Fed Farmers.

Submission on the Proposed Canterbury Land and Water Regional Plan – Variation 1 : The Selwyn-Waihora catchment.

My name is James Guild and I have farmed in the headwaters of the Selwyn/ Waikirikiri catchment since 1973. My submission relates to three main points (1) that the topography, hydrology, climate and farming systems of the upper catchment have not been properly considered in the plan; (2) that a rigid regulatory regime in the upper catchment will be unfair, unnecessarily restrictive and counter-productive; and (3) that as a general rule farmers are more responsive to encouragement than coercion.

Background

As well as farming I have a background in conservation and tourism. In the past I have held a number of elected and appointed positions in agri-business and agri-politics including President of the NZ Deer Farmers Association, director of the Game Industry Board and have been a director of venison and velvet marketing export businesses. I am a former chair of the Canterbury/Aoraki Conservation Board and I am currently President of the NZ Association of Game Estates and chair of the Queen Elizabeth II National Trust.

The property I have farmed for over 40 years is High Peak Station which is 3760 ha and encompasses the junction of the South and North branches of the Selwyn- Waikirikiri River and numerous tributaries between the Big Ben range on the west and the High Peak/ Rockwood/ Lady Barker ranges on the east. It is an area prone to high winds and snow and has a wide range of soil types, slope, vegetation cover, and now supports a wide range of productive income streams.

Accuracy

My first submission relates to the accuracy of some of the data in the Section 32 report. Even though the hill and high country area is a part of the water management zone, as shown in Figures 5.1 and 5.2, the maps in Figure 6.1 and again in 10.1 and 10.2 showing land use, distribution of farms and relative change all exclude the headwaters of the Selwyn/Waikirikiri, an area including at least 10 properties that are part of the Selwyn catchment and comprising at least 20,000 ha. I would have thought the land use practices in these area would have been critically important to the statistical data produced, particularly in Clause 10 – Managing land Use. If the plan is truly to reflect 'ki uta, ki tai' – from the mountains to the sea – then surely the headwaters should be included.

Environmental variability

When I commenced farming on High Peak Station 41 years ago the property had 4 main sources of income – wool, store lambs, calves and annual draft breeding stock. Today, after considerable development and diversification we have 18 income streams – wool, prime lambs, store lambs, and annual draft ewes from sheep; weaner calves, prime cattle and annual draft cows from beef cattle; weaner deer, venison, velvet and trophy stags from deer; guided hunting, ski-ing, fishing and farm tourism and accommodation; and beekeeping and forestry. My wife and I, our three children and their spouses all derive their livelihoods from the property and we now employ 6 permanent and seasonal staff.

Definitions in the plan are of concern. It seems hard to find a universally accepted definition of waterway or river, which is defined differently in the RMA, and various regional council plans. The repercussions are enormous when put alongside the recommendation to fence stock from all waterways. Again if I were to accept the definition that a river is *'a permanently flowing body of water'*, (and it must be noted that most definitions use 'intermittently' not 'permanently') then I would be looking at over 100 km of streams, creeks and rivers on High Peak Station. And if I wished to continue to farm cattle and deer then I would have to erect fences on both sides at an approximate cost of \$20/m which equates to \$4million, just for the fencing and without taking into account the troughs, piping, pumping and power required to reticulate stock water to about 80 paddocks and hill blocks – and which would probably freeze solid most winters.

Similarly, schedule 24 requires a 5 metre setback for 'any intensive winter grazing' from any water way. Five metres is an arbitrary figure which does not take into account what class of stock is being grazed, what slope and drainage, soil type and climate. In some instances 30 metres may be too close and in others 2 could be adequate. I support the staff clarification of 'intensive winter grazing' where *'the grazing results in significant pugging or de-vegetation. This is usually associated with break feeding behind temporary fencing.'*

On my property we have already fenced off several kms of creeks and wetlands and we have 94 ha under QE II National Trust covenant, which brings me to my final point. My experience with the National Trust and its 37 year history of land and water protection is that encouragement beats coercion every time. Farmers in hill and high country will willingly protect special places on their land, partly because it often makes good operational sense and partly because it is the right thing to do. While the National Trust has firm bottom lines and rigorous monitoring of its covenants, it starts from the principle that each proposal is unique and is a partnership initiated by the landowner, and that the landowner is the best guardian and steward of his/her land. Now with over 4000 covenants protecting 185,000 ha of private land in every part of the country, I believe some regional planners could do well to learn from that example and consider a more flexible mutually supportive approach to protecting and restoring land and water health.

To summarise, I submit that the guiding principles for establishing nutrient and water management in the Selwyn- Waihora zone should:

1. Be fair to all land users, specific to their environment and allow for flexibility and innovation.
2. Recognise that where measurement and modelling are imperfect and evolving, controlling mechanisms must be adaptive and allow for evolving standards and change in a biological timeframe.
3. Adjust regulatory control commensurate with environmental impact. (i.e low impact = low compliance costs)
4. Adopt a principle of encouragement and incentives to change on-farm behaviour before using coercion and penalties.

James Guild

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