

Good afternoon, I am Grant Morris a trustee in the GG & RM Morris Family Trust. I am here today to speak regarding two parts of the Water & Land management plan which we are specifically concerned about.

These being:

a The Physiographic zones – in particular Peat Wetlands (policy 11)

and B ~~And~~ Rule 20 E - farming regarding the Farm management plans

Firstly I would like to speak about rules surrounding the "peat wetlands' zone, and our concerns about how the rule in particular that excludes new or expanded dairy farming in this zone. The application of this rule discriminates against the owners of this land and will or has already caused loss of capital value of these properties. This rule was not noted on the certificate of title when this land was purchased and therefore brings into question the legality of the application of this rule and also the morality of this, as it seems that Environment Southland is using the peat wetlands as a scapegoat for the water quality problems in Southland.

On our property we have <sup>Land.</sup> ~~approximately 40 hectares~~ designated in the peat wetlands physiographic zone and the application of this rule affects the capital value of all our property not just the peat ~~wetland~~ zone. Further in the future with possible changes in markets <sup>which could result in reductions</sup> ~~and resulting reductions~~ in lamb and wool prices, other land uses may need to be explored to remain viable. With this rule imposed on part of our property it will make it unviable to convert to dairy, therefore dropping the capital value of all the property, not just the peat wetland area.

The main reasons for this zoning is that:

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- Phosphate leaches from it into waterways. To counter this we would like to note that there are other types of grass growing products that can be used that don't involve phosphate fertilizers, and there is also the option of organic farming.
- The second reason is that a high water level in the peat areas would run off nutrients and E coli in high rainfall situations. We would like to mention that in our peat areas there are some with a high water table but there are also some areas – approx. 50% that are quite dry and are used now for wintering as other paddocks are far wetter and have higher run off. This raises the question in that the maps used are generic whereas in reality not all peat is the same. Some is wet and some is dry and porous.

As we are now considering nutrient and E coli run off when wet I would like to comment that after heavy rainfall or wet conditions I see considerable run off coming off other physiological zones including the bedrock hill country which also carries nutrients and e coli into waterways but you have not excluded dairying from these zones. After last week's rainfall I saw our river running dirty yet the discharge points from our properties peatland were still relatively clean.

Our second concern is related to rule 20 (e) farming in regard to the farm management plans. We think that these need to be a simple document that can be filled out quickly and simply by any farmer otherwise a lot of costs will be incurred by both ourselves and environment Southland. These plans should be simple documents including: stock number and type, how managed including wintering, how much fertilizer will be applied, how much land will be cropped etc. They should only need to become more detailed when there is a significant change in farming practice. Therefore it

would be budgeted for within the change instead of becoming another costly burden on already overstretched budgets. I think this approach by ES would be far more palatable for farmers and ES may be more welcome at the farm gate with this more reasonable approach.

In conclusion we think that there is nothing wrong with identifying the physiological zones for understanding how the nutrients are dealt with within the zones, but we are against new dairying being deemed a non-complying activity within the peat wetland zone. It should be on a case by case basis for everyone. All farmers should be treated equally regardless of their physiological zone providing that they can manage the nutrients discharged from their property.

With regard to farm management plans – keep it simple.