Submitter Name:

Glorakay Station

W Pinckney Ltd, Glenaray Station

Presentation to Water and Land Hearing Panel on 11<sup>th</sup> September 2017

Date Received: 11 /9 /17

- 1. Thank you for the opportunity to make this presentation.
- 2. Thank you also for taking the time to visit the Gow Burn (Waikaia Valley) on 3<sup>rd</sup> July 2017.
- 3. We submit that the pSWLP does not adequately address the issues unique to our large, relatively extensive, style of farming and seeks to impose restrictions that are primarily designed to address the issues seen on intensive farms.

Please consider document 6, in our submission booklet:

Glenaray: 1998: 54,131 sheep, 4,763 beef, 2,424 deer. 2016: 49,427 sheep, 3,362 beef, 3,698 deer.

Fig 6.3.1 (a): From 1992 to 2014 provincial dairy numbers have increased significantly.

From 1992 to 2014 provincial sheep no's have declined.

From 1992 to 2014 provincial beef and deer no's are static.

Please also consider document 2, 3 & 4 that give evidence to contrasting levels of farming intensity. (We have never used palm kernel and the increase in our use of urea between 1996 and 2012 is grossly less than 360%).

Document 5: Water Quality at Piano Flat and Waikaia.

N Toxicity: A band.

Dissolved P: 80% better than guideline. Clarity: 95% better than guideline.

E coli: A band.

4. Para 7.653, Rule 23: a winter crop area greater than 50 ha requires consent. We grow 600 ha annually to winter our 'steady-state' capital stock (I.e. no extra stock come onto property for winter). We would be faced with a new consenting process adding further administration to the farm business. We support the need for a limit but suggest it should be 10% of title area. The current Winter Grazing Rule gives sound protection to run-off water quality during winter.

- 5. Para 7.705, Rule 25: we support the 20-degree slope limit for mechanical cultivation.
- 6. Para 10.346, Rule 70: we support the Land Slope/Farm-Stock Type table as it relates to beef cattle and deer, however we point out that on Glenaray there will be some higher-altitude ground where the slope is between 3 and 15 degrees and where it isn't sensible to build a fence for stock exclusion. (because of needing a bulldozer to create a line and the resulting water run-off problem plus the increased risk of weeds establishing on the ungrazed side of the fence).

Please see 8. below.

7. Para 10.297 to 10.311, Rule 70: Exclusion of sheep. We understand that 10.346 does not refer to sheep. However, para 10.297 to 10.311 does discuss sheep being excluded from waterbodies and with reference to document 1 (focus activity farm plan) a further 26.5 km of fencing would be required. This would be a huge cost to our farm business especially considering that Top East Block is only a small part of the farm.

Para 10.304, point 2, is, we believe, a sensible way to deal with sheep into the future.

8. Para 7.651, Rule 20: part (a) says that on areas of land that are less than 20 ha, farming is a permitted activity. We believe that a similar demarcation, based on altitude, would allow for beef and deer not to be excluded from waterbodies over 1 m. wide, between 3 and 15 degrees of slope, as per the table in 10.346, on land over 300 m (because of the low stocking rates in this environment and the practical difficulties of establishing and maintaining fences).