

BEFORE THE

Waimakariri District Council

IN THE MATTER OF

Resource Management Act
1991

AND

IN THE MATTER OF

Submissions and Further
Submissions on the
Proposed Waimakariri
District Plan

Hearing Stream 6

**STATEMENT OF EVIDENCE OF LIONEL JOHN HUME AND KARL DEAN ON BEHALF
OF THE NORTH CANTERBURY PROVINCE OF FEDERATED FARMERS OF
NEW ZEALAND**

Dated 29 September 2023

Introduction

Qualifications and Experience

1. My name is Lionel John Hume. I hold B.Ag.Sc and M.Sc. (First Class Hons) degrees from Massey University and a Ph.D. (Plant Science) from Lincoln University. I am employed as a Senior Policy Advisor, by Federated Farmers, based in Canterbury.
2. I previously worked as a scientist for the Department of Scientific and Industrial Research (New Zealand Soil Bureau/DSIR Land Resources), for 16 years, working in the areas of plant nutrition and soil fertility.
3. I have been a board member of Irrigation New Zealand for over 10 years (2006 – 2018).
4. I am a member of the NZ Institute of Agricultural and Horticultural Science, the NZ Society of Soil Science and the Agronomy Society of NZ.
5. Currently I am a member of Federated Farmers' Regional Policy team and have ten years experience of working with regional planning processes, including the Canterbury Natural Resources Regional Plan (from submission through to resolution of High Court appeals); development of the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 and membership of the implementation taskforce for those regulations; the development of catchment-based flow and allocation plans for several Canterbury catchments; the development of the Canterbury Water Management Strategy; the Canterbury Regional Policy Statement and Land and Water Regional Plan processes, including several catchment based limit-setting processes culminating in the establishment of sub-regional plans.
6. Karl Dean is a career farmer. Starting in 2005, he has farmed in the Manawatu and Taranaki provinces before moving to Canterbury in 2013. He is currently stock owner and lessee of a mixed farming system in the Selwyn District.
7. Karl is currently President of the North Canterbury province of Federated Farmers of NZ and Vice Chair of the National Dairy Council of Federated Farmers.

8. Additional responsibilities include:
- Vice Chair of the Canterbury TB-free OSPRI Committee;
 - Member of the Environment Canterbury Biosecurity and Biodiversity Committee for Mid Canterbury; and
 - Member of the Canterbury Dairy Environmental Leaders Group.

Protection of Versatile Soils and Highly Productive Land

Rautaki ahunga – Strategic Directions

SD-O4 – Rural Land

9. Federated Farmers submitted that the objective “fails to protect high class and versatile soils in the district that underpin rural and primary production”, consistent with section 5(2)(b) of the RMA (requiring that the life-supporting capacity of soils is safeguarded).
10. Specifically, Federated Farmers requested the addition of a section to SD-O4 “Protecting LUC 1-3 class land and other identified versatile soils from subdivision and development in order to maintain the life-supporting capacity of soil”. The reporting officer stated that the proposed plan had not addressed the issue of protection of highly productive land, and pointed out that inclusion of the requested section in this objective would have limited effect because half of the rural land in the district is zoned Rural Lifestyle and the provisions of the NPS for Highly Productive Land do not apply. In its hearing statement for Hearing Streams 1 and 2, Federated Farmers acknowledged the issues raised but did not agree that they justified doing nothing. Therefore, we continued to seek the amendment requested, stating that the issue is important and needs to be addressed to the greatest extent possible.
11. Therefore, Federated Farmers appreciates and supports the recommendation, in response to submissions, and consistent with relevant provisions of the Regional Policy Statement and Policy 4 of the NPS for Highly Productive Land (NPS-HPL), to amend SD-O4, giving greater priority and support to land-based primary production on highly productive land (Section 3.20.3 and 3.25 of the Officer’s Report for Rural Zones). However, it would have been useful to make specific reference to the protection of versatile, potentially highly productive soils, as requested in our original submission. We believe that an objective to protect highly productive soils would be appropriate in the context of the Regional Policy Statement and the NPS-HPL.

Urban Form and Development

UFD-P3

12. Federated Farmers requested greater safeguards for the life-supporting capacity of soils, in particular LUC classes 1-3 and other identified versatile soils. We pointed out that the district contains substantial areas of high class soils on which much of the prosperity of the district is based. Therefore, we requested an additional clause in each of UFD Policies 1-9 as follows: “Avoid where practicable any development on LUC 1-3 soils”. In addition, in UFD-P10 we requested an amended clause stating: “Minimise reverse sensitivity effects on primary production, including LUC 1-3 soils...”
13. In relation to Federated Farmers’ submissions, and similar submissions from Horticulture NZ and NZ Pork, the reporting officer recommended rejection in the context of the Urban Form and Development chapter, citing potential conflicts with the need to enable more residential development, specifically compliance with the NPS for Urban Development. The reporting officer stated that the protection of LUC 1-3 soils will be addressed in the s42A report on Rural Zones (Stream 6, October 2023). Federated Farmers emphasised the importance of this issue.
14. Therefore, we appreciate and support the recommendation (Section 3.20.3) to reconsider our submissions (and those of Hort NZ) and recommend a new clause in UFD-P3 (Identification/location and extension of Large Lot Residential Zone areas) requiring the avoidance of the loss of LUC class 1-3 soils. The rationale given for applying our request to UFD-P3 only was that these areas largely sit outside the Greater Christchurch area and are subject to the versatile soils policies of the RPS and are also subject to the NPS-HPL.
15. Notwithstanding the recommendations above, Federated Farmers continues to request that the protection of versatile soils and highly productive land should be a requirement with respect to all planning to expand existing zones or create new zones.

Rural Zones

RURZ-O1

16. Consistent with the sentiment expressed in paragraph 15, above, Federated Farmers supports the recommendation to ultimately accept our submission and amend RURZ-O1, by including a requirement to recognise *the importance of protecting the highly productive and versatile soils that form part of the highly productive land of the district* (Section 3.20.4).
17. Further, Federated Farmers supports the recommendations to increase emphasis on primary production activities and provide greater protection for versatile soils in RURZ-P2, and to provide greater protection for productive capacity, versatile soils and highly productive land in GRUZ-P2 (Limiting fragmentation of land).

RURZ-O2

18. Federated Farmers accepts the recommendation to reject its submission, and the reasons for that recommendation.

RURZ-P6

19. RURZ-P6 provides for industrial activity in the rural zones. Federated Farmers requested that clause 3 of the policy be amended to refer to effects (of industrial activity) on *existing rural activity* rather than *any sensitive activity*. The reporting officer recommended rejection of our submission on the bases that the policy was written to deal with the interface between industrial activities and residential activities (within the rural zones), and that existing use rights are established under s10 of the RMA. We accept the logic of the reporting officer but suggest that, for clarity, the policy could refer to both *existing rural activity* and *any sensitive activity*.

RURZ-P8

20. Federated Farmers accepts the recommendation to reject its submission, and the reasons for that recommendation.

RURZ-P9

21. Environment Canterbury requested a new policy addressing the spread of wilding pines. The spread of wilding pines is one of the most threatening and difficult weed issues faced by New Zealand. Therefore, we support the recommendation to accept Environment Canterbury's submission and include a new policy, as follows: *The spread of wilding trees is minimised and where established they are removed.*
22. Federated Farmers also supports the further amendments flowing from the recommended new policy, including GRUZ-R2 and RURZ-MD4.

GRUZ-O1

23. Federated Farmers requested the addition of the phrase *and are enabled* to the objective, which would then read:
Natural and physical resources and primary production activities which contribute to the District's rural productive economy dominate and are enabled while fragmentation of land into small rural parcels is restricted.
24. The reporting officer recommended rejection of our submission on the basis that the requested wording is more suited to a policy than an objective. In response, we continue to believe that it is perfectly legitimate to have an objective to maintain something, in this case primary production activities which we wish to continue to dominate the GRUZ. However, we appreciate that the concept of enabling primary production activities has been incorporated by inserting the word enabling into RURZ-P2 parts 1&2 (section 3.20.4 of the Officer's Report).

GRUZ-P2

25. Federated Farmers requested that rural zone boundaries (and lot sizes) be adjusted to protect LUC class 1-3 land from subdivision into smaller lot sizes. The reporting officer initially recommended rejection of our submission.
26. However, the issue was further addressed in section 3.20 of his report. It was recommended that an additional part 5 be added to GRUZ-P2 which requires that sites less than 20 ha do *not result in the loss of productive capacity of any versatile soils and highly productive land,*

27. Federated Farmers supports the recommended change and maintains that the protection of versatile soils and highly productive land is a crucial issue that needs to be addressed urgently.

RLZ-O1

28. Federated Farmers requested that high class soils be directly referenced in the objective, as a key part of the natural and physical resources that primary production activities are reliant on. It was stated that our submission would be addressed in section 3.20 of the current Officer's Report. This does not appear to have been done.

RLZ-P1

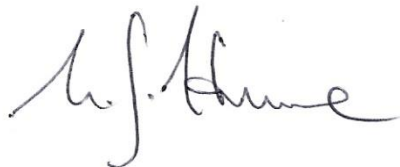
29. Federated Farmers requested an additional part 4 of the policy, stating that the zone should support the high class soils present, including LUC classes 1-3. Our submission does not appear to have been specifically addressed.
30. Federated Farmers reiterates the importance of protecting versatile, highly productive soils, and the need to explicitly do this in the Waimakariri District Plan.

Conclusion

Federated Farmers thanks the Hearing Panel for the opportunity to present this evidence statement.

A handwritten signature in black ink, appearing to read 'Karl Dean', with a long horizontal line extending to the right.

Karl Dean
President
North Canterbury Province
Federated Farmers of NZ

A handwritten signature in black ink, appearing to read 'Lionel Hume', written in a cursive style.

Lionel Hume
Senior Policy Advisor
Federated Farmers of NZ