

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 3

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

Dated 10 July 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.

Matepa mahorahora – Natural Hazards

NH-O2 – Infrastructure in natural hazard overlays

9. Federated Farmers requested that part 1 of the objective be amended to include specific reference to *critical infrastructure* to make it clear that this type of infrastructure is able to be upgraded, maintained and replaced, even though part 3 of the policy states that *critical infrastructure is avoided in high flood hazard areas and high coastal flood hazard areas , unless there is a functional need or operational need for the location or route.*
10. The s42A Reporting Officer stated that *critical infrastructure* is included in the broader definition of *infrastructure*. However, he agreed the amendment would provide greater clarity and recommended the acceptance of our submission. Therefore, Federated Farmers supports the reporting officer's recommendation.
11. With respect to NH-O2(3), Federated Farmers requested a re-arrangement of the words to increase clarity. The reporting officer agreed that the amendment would improve clarity (slightly) but opted to recommend retention of the current wording because it is consistent with the way the previous two clauses are constructed. We accept the reporting officer's recommendation.

NH-P1 – Identification of natural hazards and a risk-based approach

12. Federated Farmers supported NH-P1 as notified. Therefore, we support the reporting officer's recommendation to retain the notified wording.

NH-P12 – New below ground infrastructure and upgrading of infrastructure within high flood hazard areas

13. Waimakariri Irrigation Ltd (WIL) requested the amendment of NH-P12(3) to remove the requirement that *there are no practical alternatives* in the context of installing new below ground infrastructure or upgrading existing infrastructure in high flood hazard and high coastal flood hazard areas. Federated Farmers further-submitted in support of WIL's submission.
14. WIL considered that it is inappropriate that the policy requires that there are no practical alternatives, particularly in the case of existing infrastructure. They consider that it would be inappropriate to have to prove that there are no practical alternatives to upgrades whenever undertaking these works.
15. Federated Farmers agrees that this requirement would be inappropriate, and we believe there would be relatively little risk of damage to such (below ground) infrastructure in a flood event. We also note, as pointed out by the reporting officer, that NH-P12 is not limited to critical infrastructure, thereby reducing the consequences of damage to infrastructure in the unlikely event that this should occur. Further, the determination of what is a practical alternative, and what is not, would be subjective and therefore problematic. Therefore, Federated Farmers supports the recommendation of the reporting officer to accept WIL's submission.

NH-P18 – Fire and ice risks

16. Federated Farmers requested deletion of the policy, stating that it is unfair to blame wildfire and vehicle crash risk from ice hazards solely on shading from woodlots and shelterbelts, and to ignore plantation forestry and carbon forestry. We also pointed out that there are usually setbacks within road corridors and on the sites themselves that guard against this risk.
17. The reporting officer agreed that forestry can also contribute to wildfire and vehicle crash risk but correctly pointed out the NESPF setback provisions (for plantation forestry) are arguably stricter than those in NH-P7. It should also be noted that setbacks for carbon forest and woodlots are also imposed the GRUZ and RLZ rules (40m from residential or minor residential units, and 10 m from property and road boundaries).
18. Overall, the potential benefits of setbacks must be weighed against the disadvantages, such as the loss of best use of substantial areas of productive land and the reduced ability to limit

reverse sensitivity effects. Therefore, Federated Farmers continues to support its original submission.

NH-R7 – Woodlots and shelterbelts

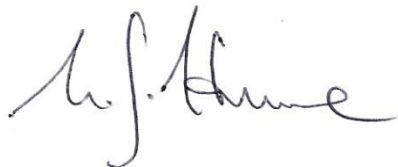
19. Federated Farmers submitted that shelterbelts are an inherent part of rural production, used for preventing wind erosion, shelter and shade for stock and as wind and weather breaks for crops and orchards. They also reduce the potential for reverse sensitivity issues such as spray drift. They are a valuable aid to primary production.
20. The reporting officer agreed that shelterbelts are an important component of rural production and that their location, as required in the proposed rule, could have an adverse effect on productive potential. However, he then cited heightened risk of wildfires in Canterbury with the progress of climate change and research into firebreak setback distance, to defend the notified setbacks.
21. Federated Farmers believe that the setbacks for plantation forests in the NESPF, and for carbon forests and woodlots in the GRZ and LRZ are sufficient. As stated previously, in relation to P18, the potential benefits of setbacks must be weighed against the disadvantages, such as the loss of best use of substantial areas of productive land and the reduced ability to limit reverse sensitivity effects.
22. The reporting officer stated that the land between a shelter belt and boundary would still be available for production. This is true to only a very limited extent. The land behind the shelterbelt will have limited access, will not enjoy the same degree and quality of shelter as that on the other side, and may experience considerable shading, depending on the orientation of the shelterbelt.
23. Therefore, Federated Farmers continues to support its original submission, that shelterbelts and woodlots, especially shelterbelts, should enjoy permitted activity status, with no setback constraints beyond those in the GRUZ and LRZ rules.

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 stroke 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