

Tabled at Hearing 27/02/2023

Statement of:

Mr Phillip Helps

In Support of:

Combined Canterbury Provinces, Federated Farmers of New Zealand (320)

Banks Peninsula Branch of Federated Farmers North Canterbury (309)

Federated Farmers of New Zealand High Country (293)

In the matter of:

Submission on Proposed Canterbury Land and Water Regional Plan (2012)

Section 42A Report Volume 1 –Section 9 Wetlands, Vegetation and Soil

Introduction

My name is Phillip Helps. I farm approximately 550 hectares on the northwest side of Port Levy and on the tops between Port Levy and Little River.

A substantial part of my farm lies within Area LH2 land shown on the planning maps, and subject to special controls on cultivation, earthworks and activities in riparian areas.

Limited erosion exists on the Peninsula and it is primarily a natural process. Human induced erosion was evident as an aftermath of the forest clearance which concluded around 1918-20 in the area between Eastern Valley, Port Levy, and Puha Valley, Little River. Practices have changed dramatically since the 1920 with people much more aware of the importance of minimising erosion and care of the environment. From this period the indigenous bush cover has increased from around 5% to a conservative 15% plus of our total land area. The balance being in permanent pasture with some forestry. An established actively growing sward of pasture contains erosion in most areas. Standing bush is no longer cleared and cultivation is for pasture renewal rather than breaking in new areas.

Accuracy and validity of 'Area LH2'

Because of the total lack of accuracy and consistency of mapping with no apparent evidence of ground-truthing, E Can is not going to get any buy- in or respect from the rural farming community in its endeavours to regulate land use to control erosion.

I agree that there are places where soil is prone to 'deep seated forms of erosion', however I do not agree that the maps as presented reflect the true picture. Nor as a consequence will the proposed regulatory measures be effective in managing issues; most areas will be over-regulated, while some areas that should have been included **will** be missed.

ECAN has not presented the Land or climate issues etc, relevant to water quality on Banks Peninsula that justify the identification of a zone along with rules to remedy the identified issue.

Is the water quality being compromised from its ambient state and by what, in which catchments etc???

I note, that a staff report admits that there is not a widespread problem of soil erosion within the Canterbury area.

Some areas identified are in soil types that are subject to tunnel gully erosion or similar issues, and are difficult and complex to manage. These are generally localised and small in areas (pockets) that occur from place to place over much of Banks Peninsula, especially areas situated in a north-western aspect, which I assume the maps have attempted to indicate. However I point out that there are just as many areas outside Area LH2 that are subject to 'deep seated gully erosion issues' as there are within it.

Land use controls associated with the maps do not provide for practices such as direct drilling, even though the adoption of this technology has made a huge contribution to reducing the potential of erosion on Banks Peninsula during the cultivation phase.

To illustrate my points, I present some examples from the areas on and around our property in Port Levy. Refer to the picture file.

Clearly from looking at land on Banks Peninsula, both on the ground and on satellite maps, some parts of Banks Peninsula are subject to erosion issues. However the reliance on "aerial view" has proved to be wanting as to accuracy in our experience in the past, due to timing, light, grazing practice etc.

Consequences of the proposal

The Section 32 evaluation of consequences has not considered the effects of the change on farm operations.

For example, to continue to farm, I must install and maintain tracks to gain access, and the presence of rock outcrops, the lay of the land, steepness, and so on means that there are few alternative options. I must also renew pasture which involves cultivation. Areas that are not renewed will become unproductive and revert to coxsfoot weeds and scrub, which as far as I far as I can see will do nothing to prevent erosion and will degrade rather than enhance environmental values.

If restrictions on cultivation and earthworks are not complied with, I will need to seek a resource consent under Rule 5.151, a rule with wide ranging consideration and which extends to matters such as *adverse effects on areas of natural character, outstanding natural features or landscapes, areas of significant indigenous vegetation and areas of significant habitats of indigenous fauna*, that have little or nothing to do with water quality.

Confusion with other planning frameworks

I am also concerned about overlying layers of plan regulations that appear to be developed in isolation, with no thought of overall environmental outcomes, or what is actually necessary in response to identified issues.

Individual plan rules might appear to be reasonable and consistent with the 'sustainable management' outcomes of the RMA, but I fear that taken together they are not.

Given the complexity of the various planning issues, I think the time has come for Banks Peninsula to be administered by a single regional/district plan, generated by the community under the Zone Committee process.

Conclusion.

I request that ECan withdraw the Banks Peninsula maps of 'erosion prone land' and related controls until further work is done towards the following;

- Evaluation of the purpose of proposed changes, together with what is deemed necessary for Banks Peninsula, upon evidence that there is an issue, and what is required to meet statutory requirements.
- Consultation, together with practical input from the host community.
- Ensuring any rules are necessary in light of alternatives, are transparent and have community buy-in.
- As a consequence, a robust Section 32 report, worthy to the Banks Peninsula farming community, covering relevant social, economic and environment issues.

I thank the hearing panel for listening and await questions.

Phillip Helps