

Tabled at Hearing 27/02/2013

Statement of:

Mr Edward Aitken

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 Edward Aitken. I have farmed for 40 years on the west side of Pigeon Bay in Banks Peninsula. In this time I have often undertaken cultivation, pasture renewal, tracking, and cleared vegetation, and am very familiar with erosions risks on my property. I have also undertaken planting for land stabilisation and riparian protection.

The proposed interventions of Environment Canterbury do not respond to an environmental issue that I can identify. Accordingly I support the submissions and hearing evidence of Federated Farmers and others.

I share the concerns raised by others about the quality of consultation, reporting, and other work undertaken prior to notification. The issues are complex and potential consequences in terms on impact on may farm or integration with other planning frameworks. Given Banks Peninsula farmer's high level of involvement in other environmental policy issues, more consultation would have been expected prior to notification.

We require more time for ECan to undertake consultation and other work to ensure that proposed rules to manage erosion risk:

- respond to an actual issue;
- are workable;
- integrate with other planning frameworks.

Please also refer to appended photos, which illustrate key points.

Accuracy of map information

Any land use controls being considered on 'Area LH2' or other erosion prone land must be based on accurate mapping and justified by a sound understanding of environmental effects of activities on the subject land. Lacking this information the proposal is meaningless.

The distribution of erosion on our and nearby properties appears to bear little relationship to the maps presented. My fear is that the maps bear little relationship to the actual issue, and will lead to equally invalid management controls.

To assume that hill country or land over 20 degrees is erosion prone is wrong. On the Peninsula, slope does not correlate well to erosion risk. Other factors such as soil conditions favouring tunnel gully erosion, and exposure to the action of the sea are much more significant.

I also point out that many of the areas included in Area LH2 are less than 20 degrees in slope, which is confusing because that is not what the title of the map presented in the staff submission suggests.

Causes of erosion

I am very aware of soil erosion and make every effort to prevent it. I run a low intensity sheep and beef farming system, and simply cannot afford to lose valuable productive soils. Erosion is a threat to recently renewed pasture or farm tracks and infrastructure, and I take all due care to avoid it.

We use spraying and direct drilling for all cultivation and run farm tracks along contours or with the run of the land wherever possible. Areas that are maintained in a healthy pasture cover are less vulnerable to erosion than areas of exhausted grass or drought damaged pasture. Healthy, productive pasture is certainly no more vulnerable than areas in forest or scrub, as illustrated by minimal erosion problems on most of our hill country, including land identified as 'Area LH2'.

The natural action of the sea, or tunnel gully erosion will cause erosion in some places no matter how the land is managed. In some places on Banks Peninsula, erosion occurred in land

Consequences

The consequences of the proposal are potentially very significant for my farm at Pigeon Bay.

My fear is that pasture renewal (of which cultivation is a part) will be restricted or become very difficult in riparian margins and on sloping land that is deemed 'erosion prone'. In partnership with Beef and Lamb New Zealand we have developed an 'early lambing' system to adapt to our mild, but often very dry climate. Pasture renewal is essential to this system because it lifts our stock carrying capacity in late winter.

I am also concerned about poor integration with other planning frameworks. According to information recently circulated by ECan, most of my farm falls within the 'coastal environment' as well as being considered by some to be part of an outstanding natural landscape. My farm, like many farms on Banks Peninsula is now subject to the very restrictive provisions of Policy 15(a) of the New Zealand Coastal Policy Statement.

I do not think it is appropriate to develop controls on land use to manage erosion without also taking into account the combined effect with other existing, or likely future regulatory controls to address other issues. Various district and regional plan frameworks have been developed or proposed to restrict land use activities on my property, which taken together may severely limit future land use.

Conclusion

Proposed controls on earthworks and cultivation near the bed of lakes, rivers or wetlands, or within Area LH2 (or other map depicting soil erosion risk) must be withdrawn.

If an issue with soil erosion is outstanding, focused controls to manage erosion must be underpinned by very accurate mapping and pro-active involvement of farmers.

The close involvement of farmers who work with soils every day is essential to ensure controls on earthworks and cultivation are practically based and support workable measures to manage identified risks.