

From: [Peelview Orchard](#)
To: [Mailroom Mailbox](#)
Subject: Submission on Proposed Plan Change 7
Date: Monday, 2 September 2019 11:00:21 PM
Attachments:

Please find attached my submission to the above Plan Change.

Regards

David Payne

For D A & S E Payne trading as Peelview Orchard

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Name of Submitter: David Payne for DA and SE Payne, trading as Peelview Orchard.

Submission on Proposed Plan Change 7 to the Canterbury Land and Water Plan

- I could not gain an advantage in trade competition in making this submission.
- I wish to be heard in support of this submission.
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

The specific provisions of the proposal that my submission relates to are:

- Part A
- Part B Orari-Temuka-Opihi-Pareora sub region

We are apple and pear growers within 2 kilometres of the centre of Geraldine. Land-use changes on our boundaries due to subdivision intensification into low-productivity, rural-residential blocks is already encroaching on our activities due to reverse sensitivity issues without any other obstacles being put in the way of productive use of our land. We come under the Orari irrigation region (OTOP Sub-region). We have a consent for a small groundwater take (4.9 litres/second) but we are not members of an irrigation scheme. This irrigation is delivered to each tree in a highly efficient manner by drip irrigation. While not high-volume users of water, it is essential for the health of our fruit trees and the certainty of our crop during critical, dry summer periods.

1. We object to the “farming activity” rules applying to fruit growing.

Fruit growing is quite different from other farming activities, such as dairy farming. There should be a clear distinction within the Canterbury Land and Water Plan between fruit growing and other farming activities that try to grow a maximum amount of grass or crop.

Fruit growing has a low environmental risk and should be provided for as a low intensity farming activity (such as proposed in the Waikato) and be enabled to operate and expand without excessive limitations.

Other differences and concerns, with regard to water use and nutrient management include:

- Dairy farmers would probably have earned about 80% of their annual income when seasonal restrictions on water are likely to apply. In comparison, we fruit growers would have earned nothing and would need water to carry our crop to harvest.
- In high-rainfall years we fruit growers may not need to use any water, under the established best-practice in fruit growing of deficit irrigation. Under the framework proposed within this plan change as it relates to OTOP, we are concerned that our lack of use of water in high-rainfall years could be seen as an excuse to reduce our already minimal water take.
- Similarly, nitrogen fertiliser is anathema to fruit growers. Because we have been fruit growing for many years and have not used nitrogen to establish a baseline, we are concerned that we would not be able to use nitrogen if we require it due to a land-use change. So, the nitrogen users would be allowed to continue to use it, even if at reduced rates, and any land-use change for our land would be stymied.

2. We object to the minimum property size for commercial vegetable growing operations

Our property is 8.79 hectares and has been a commercial pipfruit orchard since 1928. Although under 10 hectares, it is still subject to Timaru District Council rules on subdivision.

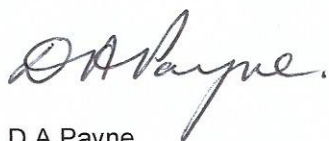
The minimum property size of 0.5 hectares as a permitted activity under Rule 5.42CA of PC7 is a nonsense for us.

We have persisted for 24 years, as small growers in a marginal area, supplying markets in Mid and South Canterbury. For additional cash flow, one year we grew 1.5 hectares of hybrid radish for seed. Being required to apply for a consent for this would have made the growing of the radish uneconomic.

In addition, I note that as we don't have a '*baseline commercial vegetable growing area*', if we can't prove our nitrogen loss rate it would be a prohibited activity for us to grow more than 0.5 hectares of vegetables. The minimum property size requirement (as in the associated rule framework) does not promote the protection of land for vegetable/high-value-seed growing in the OTOP area.

We need to be able to grow fruits and vegetables locally to feed people healthy food. When supply does not meet demand, prices will rise and the most vulnerable people in our communities will be the first to miss out. It is important that growers like us have the flexibility to grow crops to meet local demands.

Attachment 1 below includes a summary of these submission points.



D A Payne

Dated: 3 September, 2019

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Attachment 1: Summary of submission points

	Plan provision	Support/Oppose	Reason	Decision sought
1.	Part A/ Part B	Oppose	Refer to commentary above.	Fruit growing is distinguished from other farming activities within the Plan and is recognised as a low intensity farming activity.
2.	Part A – Rule 5.42CA	Support in Part	Refer to commentary above.	The minimum property size of 0.5 hectares as a permitted activity under Rule 5.42CA is increased to at least 5 hectares.
3.	Part A – Rule 5.42CE	Oppose	Refer to commentary above.	Fruit growing should not have a prohibited activity status at all.
4.	Part B – Allocation and water quality limits	Oppose	Refer to commentary above.	Take into consideration the high degree of variability of water takes across the years for fruit growers due to changeable environmental conditions such as rainfall.