

From: tim@eyretonproduce.co.nz
To: [Mailroom Mailbox](#)
Subject: PC7 Submission
Date: Friday, 13 September 2019 7:19:53 AM
Attachments: [PC 7 Submission by Tim Macfarlane.pdf](#)

To Environment Canterbury, Mailroom

Please find attached my submission.

Should you require additional information please don't hesitate to contact the undersigned.

Kind Regards

Tim Macfarlane

Eyreton Produce Limited

266 South Eyre Road

Kaiapoi R D 2, 7692

North Canterbury

New Zealand

Phone +64 3 327 7950

Fax +64 3 327 7954

Mobile +64 27 2212 944

Email: tim@eyretonproduce.co.nz

Website: www.eyretonproduce.co.nz



To: Environment Canterbury
C/- mailroom@ecan.govt.nz

Name of Submitter: Tim Macfarlane of Eyreton Produce Limited

This is a submission on the following proposed plan: Proposed Plan Change 7 to the Canterbury Land and Water Plan.

I could not gain an advantage in trade competition in making this submission.

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

- Part A – Omnibus
- Part C – Waimakariri

My submission is:

- Not all rural production activities are equal in value to the community or equal in environmental effect. The value of vegetable growing for food security and the ability to feed people in the future is not reflected in proposed Plan Change 7. A tailored approach is required for commercial vegetable production if land with high production value is to be realised for its food production purpose, while achieving catchment wide water quality improvements.
- Rural production systems are very diverse with a wide range of fruits, vegetables, arable and vegetable seed crops and other crops being grown across Canterbury.
- The Plan is limiting in the future development of different types of Arable and Vegetable crops. The district has huge potential to develop the horticultural crops. Currently the way the plan is setup there will be very few areas where crops can be developed and grown. Land use changes will be difficult. People will be seeking land areas that currently have high nitrate base lines. This in turn will influence land values based on what a farmer was doing back in the 2009 -13 period, whether or not that farmer at the time was practicing Good Management Practice.
- The assessment process underpinning the proposed Plan Change 7 does not adequately provide for new growing operations, diversification into different crops to meet future food demand.
- I have concerns about my ability to accurately assess nutrient discharges from horticultural and arable systems, specifically the deficiencies in OVERSEER to model horticultural and arable crops.
- I support requiring all growers to operate at good management practice. (GMP)
- As the current custodian of a farm that has been in the same family since 1852 if we were not practicing GMP we wouldn't still be in business we cherish our soil as this is the medium most important to growing efficient sustainable crops. Correct management of soil can store and retain nutrients to be plant available.
- We do a use irrigation. We don't irrigate to maximise production we irrigate to insure sustainable production. The key is little amount of water at critical stages.
- Water in our particular area (Silver Stream) is 43% allocated. The modelling I saw presented at one of the public meetings assumed 100% allocation. Given that the area around as is almost completely subdivided into lifestyle blocks 100% water allocation is unlikely to ever be required. Therefore the modelling should be based on reality not figures that won't ever be achieved.
- Blanket rules around open drains don't fit all farming systems the same way. We are not livestock farmers we need to keep our drains cleared of weeds to ensure adequate drainage of our crops. Permanent fencing impedes this. In most cases a crop can stand 24 hours under water. Any more than this has a detrimental affect on crop production. Therefore, drainage needs to be designed to remove surface water within 24 hours. Riparian plantings inhibit the runoff into drains so the

removal of excess ponded water isn't achievable in a 24hour period. Tile drains on the other hand are designed to cope with the high water table, these run 24 hours a day 356 days a year. There is talk of recharging Silver Stream with water from a different source like the Waimakariri river to dilute the nitrates in Silver Stream. While this might dilute the nitrates it will adversely effect the water table in the area. And could introduce didymo into a delicate spring fed stream. Large braided rivers can stand didymo because of their constant flushing. Spring fed streams can't.

- I propose provisions be added to enable existing areas of vegetable growing to move onto different land in a different catchment, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations.

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

Signature of submitter

A handwritten signature in blue ink that reads "T. O. Macfarlane".

Dated: 13th September 2019

Address for service:
Tim Macfarlane
Holton
266 South Eyre Road
Kaiapoi RD 2, 7692

Tel: 03 327 7950 / 027 2212 944

Email: tim@eyretonproduce.co.nz