PLAN CHANGE 7
STATEMENT OF EVIDENCE
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The purpose of this submission is to provide an overview from a vegetable growers perspective as opposed to a planners desktop analysis.

About 30 years ago my husband and I bought 10 hectares very close to the city for growing potatoes, onions and pumpkins.
The property had versatile soils, was close to the local market, port, workforce and services. It was sustainable in terms of food miles. The dwelling on the property was conditional on an economic plan for farming. In effect we have a consent to farm on this block.

The property is in the Christchurch West Melton sub region close to the boundary with Selwyn Waihora. Initially we leased land close to the city. Over time this became more difficult as planning rules were changed and rural land was able to be subdivided down to 4 hectares. There were more permissive planning rules, which changed land use patterns. Provisions for the protection of versatile soils were included in the RMA but never delivered. Consequently leasing land became more difficult and we were forced to go further afield to places such as Dunsandel, Southbridge, Mead and Swannanoa.

These planning rules penalized vegetable growers in terms of time and costs. We have invested a significant amount of money in coolstores, grading and storage sheds as well as plant and machinery. We employ about 8 staff during the season.

Lifestyle blocks now spread across the Canterbury Plains like the plague. While some lifestyle blocks are not economically feasible, some are, but are now prohibited to lease on the basis of being in a different sub region and having a low nutrient budget.

Maps of the sub regions indicate contrasting sizes with the Christchurch West Melton Zone being by far the smallest and also including the South Islands largest city.

My point here is that the five new rules for vegetable growing threaten our ability to continue. The biggest issue is constraining

vegetable growing operations to a single nutrient allocation zone or sub region Rule 5.42CB & Rule 5.42CC.

Rule 5.42CA permits commercial vegetable growing operations on properties 0.5 hectares or less in area.
To put that in context 0.5 hectares is the size of a small section in the city. This is inconsistent with other farming activities, which are permitted between 5 and 10 hectares.

Rule 5.42CE prohibits new or expanded operations that exceed the nitrogen loss rate applicable to the proposed location and are not permitted or consented under Rule 5.42CA or 5.42CB.

So back to the sub regions, say for example we wanted to lease land in the Selwyn Waihora sub region perhaps down the road from our own property. That property possibly had a couple of ponies on it from 2009 until 2013, doesn't matter when swings and roundabouts. So despite the fact the area of land could be included in our own nitrogen budget and is something we may have being doing for nearly 30 years, it is prohibited. Equally the same would apply if we went out to the Waimak sub region or any other sub region. In fact we have rarely leased land in our own sub region.

The reason growers lease land is to ensure good management practice with rotation avoiding pests and diseases, fresh land on good soil always produces a better crop. I want to emphasis once again how difficult it has become to lease good horticultural land and by that I mean versatile soils, water for irrigation, land either close to the city or a size and scale that is economic to travel to. The costs are higher for marginal land and the output is lower. Rules need to be across the region. These rules just add another layer of complexity to leasing land.

So what is the problem with leasing land in different sub regions if it within your nitrogen budget? The planner for Potatoes NZ said it was found to be too hard to keep track of. Nothing to do with water quality, simply too hard for enforcement and it becomes a prohibited activity. It would appear that rules in a Plan Change are now solely pivotal on the capability of enforcement. If this is correct it is disturbing. It is often said that good law is "clear and concise". Either the authors of PC7 were aware of the possible outcomes to their rules

and the consequential effects and don't care, or their rules are neither clear or concise.

There are very few activities in the Christchurch District Plan that have a prohibited activity status, it is a very high bar. Now food production has the potential to be prohibited. Have we become so affluent we have forgotten where the food on our plate comes from.

Once upon a time we all knew someone who was a farmer or worked in the primary sector. Those days are gone and I wonder if the authors of Plan Change 7 have any understanding of the complexities of farming. This is after all the second time around for vegetable growers and for some growers such as ourselves the effects are even worse.

There are a number of other issues with PC7, and I touch on some of them here. Firstly there is no pathway for the young university student studying agriculture and passionate about farming unless of course he is fortunate to have parents with a nitrogen budget. Bear in mind that the average age of a farmer is 61 and that figure speaks volumes in terms of the sheer hard work and costs involved. I spoke to a prominent South Island grower nearing retirement age who despite having three sons has no one to take over the farm. Having seen their father's long hours and hard work have decided it's not a life they want and have pursued other careers. Another farmer described how there was no fun in it any more.

Another issue has been the tendency to gloss over the cost of these regulations, resource consents, farm consultants, lawyers and the like, irrespective of the size of the operation which gives an advantage to the larger growers. There is also the cost of delays if the consent process is protracted in terms of the ability of preparing ground and planting during that window of time for doing such work. By its very nature uncertainty if consent is declined. My husband is Dutch and while farmers have environmental standards in the Netherlands if they are compliant with the regulations they are significantly reimbursed. Equally the Netherlands has a huge market at their back door while New Zealand is thousands of miles from its export market. Therefore New Zealand is at a disadvantage in terms of regulation costs and transport.

Section 32 states “there has been considerable engagement with commercial vegetable growers and Horticulture NZ in the development of the proposed provisions”. I was involved in the “series of workshops” all three of them and on a good day their may have been four growers. I have no doubt there are many growers who have no clue of the changes that are coming.

Perhaps the most damning report on PC7 in terms of vegetable growing is by the supporting officer Ognjen Mojsilovic ,
ASSESSMENT OF NITROGEN LOSSES FROM COMMERCIAL VEGETABLE OPERATIONS IN CANTERBURY
Nutrient Load
“The results of the comparison of the estimated nitrogen loads for commercial vegetable operations in the LWRP sub –region catchments compared with the total catchment nitrogen load indicates that commercial vegetable growing operations makes up a small fraction of the total loads.”

The conclusion to this report
“The total area associated with the activity has not changed significantly over the last 10 years. The relatively minor contributions from current land use components of the activity are likely to be minor. The activity and its effects remain a challenge for Overseer, presenting issues in estimating both the actual nutrient losses as well as any effect of changes in management. There are a number of sources of error compounded in the modeling process, and most were not directly assessed, which means that the numerical estimates are subject to broad uncertainty envelopes.”

In other words PC7 for vegetable growers is based on shifting sand. Consequently I am trying hard to understand why the Section 42 A Report could come out with a statement defending Rule 5.42 CE (para 8.176 page 188) on the basis that :
“Without a prohibited activity rule, vegetable production could expand unfettered and result in increasing nitrogen concentration trends in water, or diminish the gains achieved by other farming activities.”
This is for a sector that has never been regulated, has been static for 10 years, and is below the margin of error in terms of nitrogen loading. In effect Ecan has ignored the advise of its own expert.

On the one hand we have PC7 which seeks to restrict vegetable growing and on the other hand we have a Government led initative "FIT FOR A BETTER WORLD" that seeks to boost primary sector export earnings by 44 billion including horticulture exports by 2.6 billion.

So it is I am struggling to see how limiting the growth of horticulture in Canterbury, fits with the bigger picture.

There is a growing consensus on a national level that New Zealand needs to transition away from pastoral agriculture to high value and low emission agriculture such as horticulture in order to achieve net zero emissions by 2050. There is also the need to feed a growing population.

If food production was to be limited here, this would just create the need to be shifted elsewhere, perhaps in areas which are less well suited to horticulture use. Therefore the environmental impact of horticulture would just be transferred to somewhere else and it is even possible the environmental effect would be worse if the land was not as well suited to horticultural uses. Therefore implementing limits does not really seem like the best solution.

Farmland is green space. What happens to that land when farming becomes too difficult? We live in a capitalistic society it doesn't revert to rain forest. A quick look around my neighborhood would suggest housing and industrial subdivisions, quarries, truck and contractors yards. In fact any number of activities exist behind the shelterbelts. Does that mean a better outcome for water quality? Be careful what you wish for.