

From: [Ben Scott](#)
To: [Mailroom Mailbox](#)
Subject: Proposed Plan Change 7 Submission
Date: Thursday, 12 September 2019 6:25:40 PM

Please see attached my submission on Proposed Plan Change 7.

Note that I wish to be heard in support of this submission.

Thanks

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Submission in Regard to **Proposed Plan Change 7 to the Canterbury Land and Water Plan.**

To: Environment Canterbury (Mailroom@ecan.govt.nz)

Submission by Ben Scott on behalf of Scottfresh Limited

This submission refers to **Part A Omnibus** / Commercial Vegetable Growing.

My Submission is;

Whilst I agree with the framework in that it recognises commercial vegetable growers need for regular crop rotation by establishing a baseline specific to growers rather than the land they are on, my concern

- a) The proposal does not allow for population growth. This will have an effect on the price that consumers have to pay for fresh locally produced fruit and vegetables.
 - b) I support Horticulture New Zealand's submission on areas where it aligns with my own.
 - c) I support the need for good management practice and auditing schemes such as GAP NZ.
 - d) I do not agree that that land should need to be in the same sub region or nutrient allocation zone, for the reasons I outline as below;
1. In the base years a big part of our operation was in the Selwyn Waihora Zone, I can find no information that defines the actual Nutrient Allocation Farm of the Selwyn Waihora Zone, limiting my and others ability to plan or even make submissions on this Plan Change. This lack of information is one reason to remove the restriction on movement between Nutrient Allocation Zones.
 2. Whilst the information is available on sub-regions it is very hard to find on either the ECAN website or GIS mapping, again making it hard to plan or make a submission on this Plan Change. This lack of information is another reason to remove the restriction on movement between sub-regions.
 3. A number of growers operate within multiple sub-regions or nutrient allocation zones, they need a clear pathway to gain a resource consent, without the cost and uncertainty proposed.
 4. Canterbury is an area of limited coastal micro-climates. Historically the people of Canterbury have relied on produce being trucked in from other regions during the winter months. However, in the last five years growers such as ourselves have moved our operations into area with micro-climates to produce year-round. Limiting our ability to freely move between sub-regions does not allow us to continue to operate without going through a risky and expensive process.
 5. I accept that water and nutrient management has traditionally been managed by sub-region, however the proposed changes around Commercial Growing go outside the traditional thinking and have largely been done in recognition of the minor effect that the industry as a whole has and the realities of domestic food security, I would expect that the same thinking would be used in granting the right to move between sub regions and nutrient allocation zones.
 6. A significant part of the Proposed Plan Change 7 refers to groundwater nitrate issues for the Waimakariri area. The lack of a clear pathway for those growers in that area to take their base lines into other sub regions (regions with potentially less nitrate loading) is another negative consequence of limiting movement between sub regions.

Scottfresh operates Commercial Vegetable Operations over numerous sites throughout Canterbury, including on the Conway Flat Road, Claverley Road, Down Roads Spotswood and Gillanders Road Greendale. We Formally operated at Walters Road Marshland, and North Rakaia Road Southbridge.

Almost all out production is for the domestic fresh vegetable market, we have seen significant growth in the last five years.

More information about Scottfresh can be found on our website - <http://www.scottfresh.co.nz/>

Plan Change 7 will have a significant affect on our business as during the base years we operated in the Selwyn Waihora Zone and have now moved to the Hurunui and Kaikoura Zones. Despite moving to an area with significantly less nitrate loading we are not able to use our 2009 – 13 baseline years, something that will have a detrimental effect both on the environment, the people who work within our business and for security of locally grown fresh vegetables in Canterbury.

I wish to be heard in support of this submission.

A handwritten signature in black ink, appearing to read 'Ben Scott', with a long, sweeping horizontal line extending from the end of the signature.

Ben Scott

12/09/19

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