

From: [R Hewson](#)
To: [Mailroom Mailbox](#)
Cc: [Aa Hewson Rocky](#); [McCain Scott](#); [Eva Harris](#)
Subject: Hewson Farms Nz ltd plan change 7
Date: Thursday, 12 September 2019 11:13:53 PM

To Enviroment Canterbury
please find enclosed our submission for plan change 7
Regards
Ross Hewson
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>
>

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

Name of Submitter:

Hewson Farms NZ Ltd

Address: 721 Chertsey Road, Pendarves, No 7RD, Ashburton, 7777

Contact: Ross Stewart Hewson

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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 B – OTOP
- Part C – Waimakariri
- Hewson Farms have developed and are collaborating with other parties and express our strongest support of their submissions these are as follows:
 - BCI Irrigation Ltd
 - AFIC Irrigation Ltd
 - Federated Farmers
 - Hort NZ
 - Potato NZ

My submission is that:

- Not all rural production activities are equal in value to the community or equal in environmental effect. The value of vegetable growing; including potato production for domestic food supply and security and the ability to feed people in the future is not reflected in proposed Plan Change 7. Nor are the effects of climate change considered in maintaining the status quo land use activity mix
- 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 and other environmental benefits in the longer term
- Rural production systems are very diverse with a wide range of fruits, vegetables and other crops being grown across Canterbury. Potato production systems rely on rotations; often enabled by sharing and leasing agreements. The current Canterbury approach has significantly degraded the ability to undertake new leases. Plan Change 7 presents significant further obstacles and requires amendment to avoid wider effects that are most likely unintended
- The assessment process underpinning the proposed Plan Change 7 does not adequately provide for new growing operations to meet future food demand. Existing production is also at threat from the restrictions on movement of activities across property and catchment boundaries
- I have concerns about my ability to accurately assess nutrient discharges from horticultural systems, specifically the significant deficiencies in OVERSEER to model horticultural crops, and would support a more generic method for tallying nutrient losses. The potato sector is supporting a more accurate “direct measurement” based approach and in my view that is more appropriate

- The real water quality improvement come from the practices I adopt to manage discharges from land I manage (often only temporarily). I support requiring all growers to operate at good management practice
 - 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 also support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of the response to water quality issues. I consider Plan Change 7 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should not be expressly disallowed
 - Where this submission aligns with the PotatoesNZ and Horticulture NZ submissions, I support those submissions
 - My operation is located at Pendarves Ashburton and comprises of the following crops and area_Potatos_400 hectares; Onions 200 hectares; vegetable seed crops 200 hectares;
 - Cereal crops; Herbage seed crops; Brassica seed crops; Legumes; Pulse crops; Forage crops; Oil seed crops; etc 1300 hectares incl leased fields
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- Plan Change 7 is likely to affect my business in the following ways: _
- Fails to take into consideration the importance of vegetable and arable crop growing operations for addressing climate change.
- Creates a barrier to farmers wishing to diversify their operation into vegetable growing activities.
- Plan Change 7 proposed rules and frame work will increase barriers for vegetable and arable growers to expand their operation in response to population growth and consumer switches to plant based diets. Not only will these barriers limit production they will provide significant increases to the price of vegetables and all other food.
- Completely fails to consider natural limitations of soil types, topographical limitations and climate for these cropping activities to succeed and be sustainable
- Overseer Completely ignores and not aligned with proven factual data sets from actual field crop production that has been carried out on our fields.
- _____
- _____
- _____

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:



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Dated: 11/09/2019

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