

**From:** [Fallgate Farm](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** ["Raymond and Adrienne Bowan"; james.fallgate@farmside.co.nz](#)  
**Subject:** Proposed PAn Change 7 submission  
**Date:** Friday, 13 September 2019 3:30:48 PM  
**Attachments:** [20190913152557594.pdf](#)

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Hi there

Please find attached

Many thanks

Raymond and James

To: Environment Canterbury  
C/- [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)

**Name of Submitter:**  
**Raymond & James Bowen**  
**Fallgate Farm - Orari, South Canterbury**

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

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 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 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 has multiple locations
  - Farm Road, Orari
  - Factory Road Temuka
  - Coldstream, Rangitata
  - Seadown (lease)
  - Winchester (lease)

Our operation Comprises of the following crops

Potatoes	200 Ha
Cereal, Wheat, barley & Maize	1000 Ha
Onions	18 Ha
Grass seed	180 Ha
High Value radish and brassica seed production	20 Ha
Process Carrot	30 Ha

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- Plan Change 7 is likely to affect my business in the following ways:

All the markets that we supply are in constant flux, which means how business looks today is different than 10 years ago and we anticipate will look different 10 years from now. To this end to remain relevant we need to be flexible in our crop patterns and how we grow the crops.

We feel that plan change 7 will limit our ability to move with the market conditions, meet our customer needs and while growth of the business is not our main driver, we need to have this flexibility in our operation.

With leasing ground being part of successful potato rotation, the proposed plan change concerns us being unable to maintain quality potato production. We feel the plan has not taken into effect the specific varieties that are grown at our location and our management practices.

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**



**Dated:**

13 September 2019

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