

From: [Aaron Chudleigh](#)
To: [Mailroom Mailbox](#)
Subject: Submission for Proposed Plan Change 7
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To: Environment Canterbury
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Name of Submitter: Talley's Group - Ashburton

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

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

- Part A – Omnibus
- Part B – OTOP
- Part C – Waimakariri

The Talley's Group has taken note of the proposed plan changes to the Mid-Canterbury region, and has been alarmed at these proposed changes and the impact it would have on both the region as well as our business.

The action plan makes it extremely hard to continue growing vegetables in the region, and this will have a spin off effect on not only our business, but potentially on our workforce and their families living in the region.

A lot of work has already been done to improve water quality, and the report fails to acknowledge these efforts. Further to this, not all waterways are declining in quality, and the proposal fails to recognise this as well. The proposals will put huge costs on farmers who are already making an effort to improve water quality.

The report furthermore fails to recognise 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 and international 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.

We suggest that a tailored approach be investigated 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.

We 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. We 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.

As a business that is growing and heavily investing in infrastructure in the region, the lack of opportunity for growers to expand their current crop areas will hamper our business' competitive advantage in producing and selling our products locally and abroad. It will hamper our ability to grow our business. Should we become unsustainable, it could lead to the downfall of our business, and will have a major impact on not only the Ashburton town community, but also employees and growers of this region.

We strongly support the efforts and submission of Potato New Zealand and will consider presenting a joint case with them at a hearing.

Regards

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