

From: [Richard Redfern](#)
To: [Mailroom Mailbox](#)
Subject: Submission Proposed Plan Change 7 to the Canterbury Land and Water Plan
Date: Friday, 13 September 2019 11:32:33 PM

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

Name of Submitter: Aberdeen Farm Limited / Richard Redfern

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 is located at 34 Rakaia River Road, Methven and comprises of the following crops and hectares:
Arable – 360Ha
Potatoes – 130Ha

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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