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**From:** John and Lynn Madeley <johnlynnmadeley@gmail.com>  
**Sent:** Wednesday, 11 September 2019 5:11 PM  
**To:** Mailroom Mailbox  
**Subject:** Plan Change 7 to the LWRP Submission A J Madeley  
**Attachments:** PC7 AJ Madeley.pdf

Please find attached my submission to the Plan Change 7 to LWRP.

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## Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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Submitter ID:

File No:

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 5 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 13 September 2019 to:

Proposed Plan Change 7 to the Land and Water Regional Plan  
Environment Canterbury  
P O Box 345  
Christchurch 8140

Full Name: A. John MadeleyPhone (Hm): 03-3126857

Organisation\*: \_\_\_\_\_

Phone (Wk): \_\_\_\_\_

\* the organisation that this submission is made on behalf of

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Contact name and postal address for service of person making submission (if different from above):  
\_\_\_\_\_  
\_\_\_\_\_

### Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- ☒ I could not gain an advantage in trade competition through this submission; or  
☐ I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

- ☐ I am directly affected by an effect of the subject matter of the submission  
☐ I am not directly affected by an effect of the subject matter of the submission

Signature: A. J. MadeleyDate: 11-9-2019

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

- ☒ I do not wish to be heard in support of my submission; or  
☐ I do wish to be heard in support of my submission; and if so,  
☐ I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

Please see attached Document

Add further pages as required – please initial any additional pages.



**Submission regarding Plan Change 7 to the LWRP**

I am making this submission to request further consideration with regards to the items in Plan Change 7 summarised as: -

- New water quality limits for groundwater and surface water
  - Requirements for farms to further reduce nitrogen losses over time
  - Increases to minimum flows for rivers and streams
  - A cap on the volume of water available for allocation
  - Requirements to exclude stock from a broader range of waterbodies.
1. Farm practices over many years have seen changes and these are ongoing. The result is making soil better quality eg - more depth of organic matter through no stubble burning and incorporating straw, dairy grazing also incorporates the straw into the soil. Irrigation has played a major role in controlling how much nutrient is required i.e. fertiliser plus water equals greater yields and an economic benefit.
  2. We are the third generation to farm the same property and the above changes have resulted in significant improvements of production eg difference of approx 200% increase in tonnes for grain crops. This is one example only of improvement. The increase in production over all the farming sector has significant economic benefits, with flow through to towns and goes to cities, service sector eg irrigation equipment/servicing companies, Ecan monitoring. In other words, important in the cycle of economic well-being for New Zealand and New Zealanders.
  3. I acknowledge there are some issues with nutrients - but my view is that with science and farm changes this will improve eg what will happen when the soils change with time on irrigated lighter soils. I have seen the changes on our own lighter block - more water holding, deeper organic matter profile which must mean it is holding more nutrient. The science around nitrate inhibitors, different - more stable fertiliser - we have cut rate by 15%, also deep nitrogen tests means we can calculate correct amount of nitrogen. Keeping soil growing crops all the time keeps cover on soil, help microbial activity - soil is living thing.
  4. Science can help us understand more. I think a decade (10 years) is a realistic time frame to stop and turn around these issues. This document (PC7) does not appear to me to have taken into account soil types and understanding of water. Our own property - we have 2 nutrient zones? How does that work?
  5. STRESS: the proposals will place a massive amount of stress - for 1<sup>st</sup> farmers; 2<sup>nd</sup> Rural communities; 3<sup>rd</sup> cities. This is in addition to the current mental health and suicide problems which the country is struggling to provide answers to resolve. Is this to be another mid-1980's situation, where farmers end up walking off their properties again? This time we can't grow our economy out of it because you want us to go backwards. Yes - growing forestry is good, but people can't eat trees. Is it possible we will become an importer of food?

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6. RIVER QUALITY: a lot of talk about river upstream from cities and towns. What about downstream from towns and cities? The improvement to river quality must be inclusive of all and the responsibility of all society, culture, urban and rural. Minimum flows have worked well up until now - why change? I think we need a better understanding of river flows and water temperatures from spring-fed streams. I would like to see more science.
7. ECONOMIC: I wonder how much value will be wiped from "New Zealand Incorporated" with these changes. We will pay a higher interest rate because of higher risk. Will our farm land become the Zimbabwe of the South Pacific?
8. THE FUTURE: New Zealand was, and is, built of farming and tourism. What will tourists see in the future? or experience? Science will play a huge roll in the future eg genetic modification and may be some cows go indoors for parts of the year. I think there is a place for cropping to utilise nutrient from cows, but who will buy this grain. Our mills etc are owned by multi-national food companies which source from all over the world - a lot of it subsidised. Also there is plenty of grain everywhere throughout the world - but efficiently produced dairy is a very saleable commodity, so New Zealand needs dairy farming. Historically we have used science to improve farming practices and I have no doubt in my mind this must be the way forward too.

In conclusion, I wish to state that farmers are already working on nutrient management, and best farming practice. I think 10 years is a reasonable time frame for us to have a true understanding of the issues affecting us now, taking into account the latest and future science, and allowing positive changes without destruction of communities. But I also think that science, education, localised unique situations of soils and waterways, all need to be considered carefully prior to insisting on change by a set date simply to appease those whose livelihood does not rely on the agricultural sector for economic existence.



What is science going to tell us in 10 years time? This is a changing world and regulation must allow room for new information and evidence.

I would like more discussion, information, scientific evidence before agreeing that the proposals of PC7 should be accepted.

A J Madeley

Date 11-9-2019.