

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-102
<b>Response Date</b>	21/03/14 12:28 PM
<b>Consultation Point</b>	7. MANDATORY INFORMATION - HAVE YOUR SAY ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>To Be Heard</b>	
<b>Please select the appropriate option from the following:</b>	I DO NOT wish to be heard in support of my submission; or
<b>If so</b>	

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-72
<b>Response Date</b>	21/03/14 11:18 AM
<b>Consultation Point</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

- Item 1. The new plan penalises those that are already protecting the environment.
- Item 2. Overseer is 20-30%+/- (and can be more) the actual, therefore not accurate. It is a farmers tool, not to be taken as gospel.
- Item 3. The plan assumes there no more water available in the red zones, there is no proof of this.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

- Item 1. The baseline over 4 years for an existing farm using overseer. This does not take into account the effort and expenses incurred for that particular farm. Farmers that have been assertive and adapted a long term plan strategy to protect the environment are being penalised for doing so. Those farmers that have a high N leaching baseline will be partly be because of the system used which is usually the cheapest and environmentally adverse, however gives them the advantage for future use and intensity.

Item 2. Overseer. Although there is no other nutrient management software available does not mean overseer is correct. There needs to be a buffer in the modelling which is directly linked to the consents allowing fluctuations that Overseer does not account for.

Item 3. There is no proof that there is no water available in the red zones. '50% of land-surface recharge' is not a adequate method.

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<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-73
<b>Response Date</b>	21/03/14 11:22 AM
<b>Consultation Point</b>	11.4.14 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Item b is unacheivable for any dairy farming practise to be economically sustainable.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

This should be a farm by farm basis and realistic.

## Make Submission

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<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-75
<b>Response Date</b>	21/03/14 11:36 AM
<b>Consultation Point</b>	11.4.17 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Support

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

A good level to aim for.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Keep this process achievable and realistic and we can all work together.

## Make Submission

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<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-76
<b>Response Date</b>	21/03/14 11:40 AM
<b>Consultation Point</b>	11.4.16 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Support

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This is a realistic number

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Great to see an achievable rule.

## Make Submission

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<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-77
<b>Response Date</b>	21/03/14 11:40 AM
<b>Consultation Point</b>	11.4.15 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

A number of farming systems already include a large amount of environmentally beneficial infrastructure which makes it very difficult to achieve this decrease. Management systems that are already environmentally assertive will be penalised as a result.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

15kg of N per ha is too low as a base line and needs to be much higher and needs to be based on the rule 11.4.16.

## Make Submission

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<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-79
<b>Response Date</b>	21/03/14 11:47 AM
<b>Consultation Point</b>	11.4.20 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This will allow good river flows.

Irrigation areas should be added by taking from the surface water.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

If there is more water going down these drain than needed it only makes sense to form new consents that allow the water use given that the low flows at the end of the stream/drain are met.

Ecan states it wants to create more irrigated area, this is a perfect opportunity.



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<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-80
<b>Response Date</b>	21/03/14 11:49 AM
<b>Consultation Point</b>	11.4.21 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This will allow good river flows.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Irrigation areas should be added by allowing new takes from the surface water.

If there is more water going down these drain than needed it only makes sense to form new consents that allow the water use given that the low flows at the end of the stream/drain are met. Ecan states it wants to create more irrigated area, this is a perfect opportunity.

## Make Submission

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<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-81
<b>Response Date</b>	21/03/14 11:53 AM
<b>Consultation Point</b>	11.4.22 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Consents should be able to be transfered anyway given the affects on the envirinment are less than minor.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Delete this rule.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-82
<b>Response Date</b>	21/03/14 11:55 AM
<b>Consultation Point</b>	11.4.23 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This limited reallocation does not reflect drought years or minor practise changes.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Allow consent holders to justify the consent and its content.

Do not use demonstrated use as a benchmark

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-83
<b>Response Date</b>	21/03/14 11:59 AM
<b>Consultation Point</b>	11.4.24 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This does not take into account the consent holders situation.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

The consent holder needs to be able to keep the consent and use it when they desire. If they choose to surrender all or part of the consent it need to be at thier discretion.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
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<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-84
<b>Response Date</b>	21/03/14 12:05 PM
<b>Consultation Point</b>	11.4.27 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Insecurity of the current farming system if imposed.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Change the rule to have the current consents with an adaptive management kept and no adaptive management conditions on consents that have been subject to them.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-88
<b>Response Date</b>	21/03/14 12:11 PM
<b>Consultation Point</b>	11.4.31 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Adverse affects on ground water

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Daming helps the water go through to ground water, depleting any nitrate contamination. Delete this rule.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-91
<b>Response Date</b>	21/03/14 12:14 PM
<b>Consultation Point</b>	11.4.33 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This means all people that use a well will need a flow meter to calculate water usage.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Unnecessary. Will not allow people to water their large sections.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-95
<b>Response Date</b>	21/03/14 12:21 PM
<b>Consultation Point</b>	11.5.6 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Nitrogen limit of 15kg of N per ha per annum is too high

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Increase this to a realistic number

Increase the the minimum property size to the minimum title size which in the rural zone is 50ha.



## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-97
<b>Response Date</b>	21/03/14 12:23 PM
<b>Consultation Point</b>	11.5.7 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Unrealistic N leaching figures

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Increase this to a realistic figure of 30 kg of N per ha per annum.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-98
<b>Response Date</b>	21/03/14 12:24 PM
<b>Consultation Point</b>	11.5.8 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Unrealistic N leach figure used

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Increase this to a realistic figure of 30 kg of N per ha per annum.

## Make Submission

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<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-100
<b>Response Date</b>	21/03/14 12:26 PM
<b>Consultation Point</b>	11.5.9 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Unrealistic N leaching figure used

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Increase this to a realistic figure of 30 kg of N per ha per annum.

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<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-105
<b>Response Date</b>	21/03/14 12:39 PM
<b>Consultation Point</b>	4 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This rule limits initiation of efficiency of water use.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Make this rule optional.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
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<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-106
<b>Response Date</b>	21/03/14 12:53 PM
<b>Consultation Point</b>	Table 11(m): Limits for Groundwater ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This does not compare with the world standards.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

The target for nitrates in the water should be 10mg/L.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
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<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-107
<b>Response Date</b>	21/03/14 12:55 PM
<b>Consultation Point</b>	Schedule 7 – Farm Environment Plan ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

N leaching figure is too high

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

The N leaching figure needs to be increased to 30kg of N per ha per annum

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-108
<b>Response Date</b>	21/03/14 12:57 PM
<b>Consultation Point</b>	Schedule 10 - Reasonable Use Test ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This eight and half out of ten years may not be a good representative sample.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Use a 200 year drought as the test for required water use.

## Make Submission

<b>Consultee</b>	Mr Joel Townshend (52175)
<b>Email Address</b>	townie@clear.net.nz
<b>Address</b>	45 Griffiths Road R.D.4 Ashburton 7774
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Joel Townshend
<b>Submission ID</b>	V1pLWRP-110
<b>Response Date</b>	21/03/14 1:09 PM
<b>Consultation Point</b>	Schedule 24 – Farm Practices ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

There need to be a lead in period for the all of the farm management practices.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Create a 10 year lead in period for the farm management practices.

Allow the riparian margins to be less given there is fall away from each subject river, artificial water course or wetland.