

Make Submission

Consultee	Mr Keith Townshend (52186)
Email Address	keith.rosemary@xtra.co.nz
Address	675 Lower Beach Road R.D.4 Ashburton 7774
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Keith Townshend
Submission ID	V1pLWRP-101
Response Date	21/03/14 12:26 PM
Consultation Point	7. MANDATORY INFORMATION - HAVE YOUR SAY (View)
Status	Submitted
Submission Type	Letter
Version	0.3
To Be Heard	

Please select the appropriate option from the following: I DO NOT wish to be heard in support of my submission; or

If so

Make Submission

Agent	Mr Joel Townshend (52177)
Email Address	koogz@clear.net.nz
Address	45 Griffiths Road R.D.4 Ashburton 7774
Consultee	Mr Keith Townshend (52186)
Email Address	keith.rosemary@xtra.co.nz
Address	675 Lower Beach Road R.D.4 Ashburton 7774
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Keith Townshend
Submission ID	V1pLWRP-71
Response Date	21/03/14 11:14 AM
Consultation Point	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan (View)
Status	Submitted
Submission Type	Web
Version	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.