From:	Trent Dellow
То:	Healthy Rivers
Subject:	Waikato Regional Council Healthy Rivers Wai Ora - proposed Plan Change 1
Date:	Tuesday, 7 March 2017 11:50:40 a.m.
Attachments:	water plan07032017.pdf
	nitrogen reference point.docx
	stock exclusion for waterways.docx

To Whom It May Concern

Please find attached Rotor Work Limited's submission form on the proposed Waikato Regional Plan Change 1.

Rotor Work Limited owns and leases a number of drystock farms. Half of one of the farms we lease falls in the priority one area of the Healthy Rivers Plan Change 1. We support the vision of the plan to have healthy and swimmable rivers, but we are concerned with some of the uncertainties behind the plan after the first 10 years, some changes are needed to be confident we will still have a viable farming business for the future years.

Thanks

Ben Dellow Rotor Work Limited

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPA RIVER CATCHMENTS

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

- On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 -Waikato and Waipa River Catchments
- To: Waikato Regional Council 401 Grey Street Hamilton East Private bag 3038 Waikato Mail Center HAMILTON 3240

Complete the following

Full Name: Ben Dellow - Rotor Work limited
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Postcode: 3983

Email: ben@rotorwolk.co.ng

I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

3 Oclaw

Signature

date



<u>Waikato Regional Council Propose Regional Plan Change 1 – Waikato & Waipa River</u> <u>Catchments</u>

Nitrogen Reference Point

Policy 2 and 7 Rules 3.11.5.3-3.11.5.7 Schedule 1. And any consequential amendments arising from these submission points.

I oppose this for drystock sheep & beef farms.

- Will decrease land values and drystock farmer's equity in land.
- Limits any cattle policy changes and ability to move with markets even though stocking rates are much lower than farming.
- Puts a lifetime restriction on land for the future generations of farmers.
- Rewards long term polluters and limits low end polluters.
- Use of Overseer is unfair. Overseer was never designed for drystock purposes and has up to a 30% error rate. It is known to give lower readings at the low end emitters and higher readings at the high end.
- Very unfair to have a dairy farmer emitting possibly three times as much as a drystock farmer.

Alternatives

I suggest some alternatives:

- Set a fair limit of 30kg/N/ha for all farms and all farm types.
- All farms above this level to be closely monitored and incur costs if to continue.
- Possible rewards for low end emitters.

<u>Waikato Regional Council Propose Regional Plan Change 1 – Waikato & Waipa River</u> <u>Catchments</u>

Stock Exclusion from waterways

Policy 2. Schedule C and Table 11-2 Priority Sub Catchments. Rule 3.11.5.1 3.11.5.2 and any consequential amendments arising from submission points

I partially support this proposal but require some amendments:

- I agree that major rivers on easy terrain should be fenced.
- I agree that intensive areas of drystock farms should have their waterways fenced.

I oppose the fencing of all waterways in hill country due to the reasons below:

- Stock rates in hill country are much lower.
- Costs of fencing and installing reticulated water systems are also much higher than on easier terrain.
- Would require loss of land as larger areas of land will need to be fenced around the waterways, so the fences were in more practical and workable places.
- The fenced areas would become areas of noxious weeds requiring chemicals to be used and these would end up in the waters.
- Would remove access for recreational activities to the water.
- Undergrowth in the fenced off areas will create increased flooding in future.

Alternatives:

I suggest some alternatives:

• Every situation is different. I believe it needs to be assessed on a farm by farm basis, dependent on the above factors.