

# FURTHER SUBMISSION FORM

IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION/S ON NOTIFIED:



## PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS AND VARIATION 1 TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS

Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

**Council needs to receive your further submission by 5pm, Monday, 17 September 2018. Please read the notes on making a Further Submission at the end of this form before completing your submission.**

### IMPORTANT NOTE

A copy of your further submission must be served on the original submitter/s within 5 working days of being lodged with council. An address list of all submitters is included with the summary of decisions requested documents and is available at [waikatoregion.govt.nz/healthyivers](http://waikatoregion.govt.nz/healthyivers)

### YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

Name of submitter (individual/organisation)		
Contact person (if applicable)		
Agent (if applicable)		
Email address for service		
Postal address for service		
		Post code:
Phone number/s	Home:	Business:
	Mobile:	Fax:

### IN ACCORDANCE WITH SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT:

I am:

- A person representing a relevant aspect of the public interest.  
*In this case, also specify the grounds for saying that you come within this category; or*
- A person who has an interest in the proposal that is greater than the interest the general public has.  
*In this case, also explain the grounds for saying that you come within this category; or*
- The local authority for the relevant area.

My reasons are (i.e. grounds for selection above):

#### PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

- Yes, I wish to speak at the hearing in support of my further submission.
- No, I do not wish to speak at the hearing in support of my further submission.

#### JOINT SUBMISSION

- If others make a similar submission, please tick this box if you would consider presenting a joint case with them at the hearing.

#### IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached \_\_\_\_\_ extra sheets.       No, I have not attached extra sheets.

#### SIGNATURE - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed  Richard Briggs  
Chief Executive  
Hamilton City Council \_\_\_\_\_ Date \_\_\_\_\_  
*Type name if submitting electronically*

#### FURTHER SUBMISSIONS CAN BE SENT BY



Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240



Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton



(07) 859 0998



healthyrivers@waikatoregion.govt.nz *Please note: Submissions received by email must contain full contact details.*

**PLEASE CHECK** that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

**Personal information is used for the administration of the submissions process and will be made public.** All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

Form 6 of Schedule 1, Resource Management Act 1991.

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
McQuinn, Jason	70619	Tahuna, Tahuna 3373	General	PC1-4986	Oppose	<ul style="list-style-type: none"> <li>HCC supports the need for stormwater runoff from roads to be managed, but opposes the proposed amendment, which would require strategic replacement of all tar seal and bitumen roads with paved cobble or concrete surfaces.</li> <li>Stormwater runoff from roads falls under point source discharge management.</li> <li>Replacement of tar seal and bitumen roads with concrete is likely to be a huge capital cost and will not eliminate contaminants discharged from the roads.</li> </ul>	I seek that the whole submission be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	General	PC1-8188	Oppose in part	<ul style="list-style-type: none"> <li>The Collaborative Stakeholder Group, when developing PPC1, settled on the objective of achieving the long term water quality targets by 2096. This was considered a reasonable and realistic timeframe to effect the landuse changes that are necessary, while sustaining the ability of people and communities to provide for their social, economic and cultural wellbeing. Requiring these targets to be achieved in a shorter timeframe will put additional financial and social stress on people and communities, which may be unsustainable.</li> </ul>	I seek that the part of the submission that seeks shorter time frames be disallowed.
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penler	General	PC1-11566	Oppose in part	As the submission includes no suggested wording of amendments, HCC is unable to assess its implications; the submission is unclear, and the effects of allowing it are uncertain.	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>AMEND PPC1 to strengthen provisions for the protection of lakes and wetlands, ... including provisions which ... ensures setbacks are appropriate to protect lakes from deterioration.</li> </ul>
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penler	General	PC1-11566	Support in part	It is sensible for clarity targets to recognise the presence of any unavoidable, natural peat staining in lakes, if this effects clarity.	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>For lakes where peat staining limits clarity, account for this in target setting.</li> </ul>
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penler	General	PC1-11566	Oppose in part	It is inappropriate to regard all "shallow water" as "wetland" and thereby make it subject to the relevant provisions of PPC1 relating to wetlands.	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>AMEND the definition of wetlands to include "shallow water".</li> </ul>
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penler	General	PC1-11566	Oppose in part	<ul style="list-style-type: none"> <li>This submission is internally conflicted. The first part seeks to ensure the contaminant load discharged to the river is not increased, while the second part seeks to ensure that increases in contaminant load are managed.</li> <li>It is not clear what the submission is seeking; no proposed wording of new or amended provisions is provided.</li> <li>The relief sought by the submitter could have the effect of preventing development and land use activities that are necessary to give effect to the Waikato Regional Policy Statement.</li> <li>Policy 11 already requires anyone undertaking a point source discharge to adopt the best practicable option to avoid or mitigate the adverse effects of the discharge.</li> </ul>	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>AMEND PPC1 to provide for a review of the point source policy, rules and methods and amend to ensure this pathway for contaminants does not increase the contaminant load to the Waikato River, including consideration of a method to encourage best practice storm water technologies in urban areas.</li> <li>AMEND to ensure there are clearly understood mechanisms that allow any cumulative increase in contaminant loads to be managed.</li> </ul>
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penler	General	PC1-11566	Oppose in part	As the submission includes no suggested wording of amendments, HCC is unable to assess its implications; the submission is unclear and the effects of allowing it are uncertain.	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>ADD a policy ensuring review of methods in FMU's where water quality limits are breached or where monitoring trends show that the 10% improvement target is unlikely to be met.</li> </ul>
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penler	General	PC1-11566	Oppose in part	As the submission includes no suggested wording of amendments, nor any proposed setback distances, HCC is unable to assess the submission's effects; the submission is unclear and the effects of allowing it are uncertain.	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>AMEND PPC1 to ... Ensures setbacks are appropriate to protect lakes from deterioration.</li> </ul>
Watercare Services Ltd	74077		General	PC1-8454	Oppose	In general, HCC supports amendments that will better align PPC1 and/or the Section 32 analysis with the requirements of the RMA, NPS-FM, NPS-UDC, and/or Waikato Regional Policy Statement and improve PPC1's clarity. However this submission point doesn't identify any specific amendments, so HCC is unable to identify the effects of the submission being allowed.	I seek that the whole submission be disallowed.
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Area covered by Chapter 3.11	PC1-11254	Oppose in part	<ul style="list-style-type: none"> <li>The use of the terms "targets" and "limits" in the 4th paragraph is consistent with their definitions in the NPS-FM, namely, "Target" is a limit which must be met at a defined time in the future. This meaning only applies in the context of over-allocation"; and "Limit" is the maximum amount of resource use available which allows a freshwater objective to be met". It is not necessary to replace "targets and limits" with "long term desired water quality states".</li> <li>Similarly, it is not necessary to replace "long term freshwater objectives" with "long term objectives". The NPS-FM includes the following definition: "Freshwater objective" describes an intended environmental outcome in a freshwater management unit". This is an appropriate description of the 80 year attribute states listed in Table 3.11-1.</li> <li>If the 80-year water quality attribute states listed in Table 3.11-1 were not regarded as "targets", then their significance would be diminished, and PCC1 would be weakened. If focus on achieving those states were lost, then even greater effort could be required in the future to achieve them. This would have more significant adverse economic and social effects than if they were identified as targets and kept in the regional community's sights.</li> <li>Section 75(3)(c) of the RMA requires HCC is to give effect to the Vision and Strategy for the Waikato River. Objective 2.2.9 of the Hamilton City District Plan is: "The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities".</li> </ul>	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>The following amendments to the 4th paragraph on page 11 : "FMUs are required by central government's National Policy Statement for Freshwater Management 2014. FMUs enable monitoring of progress towards meeting <a href="#">freshwater objectives developed to give effect to the National Policy Statement for Freshwater Management and long term desired water quality states developed to give effect to the Vision and Strategy, targets and limits</a>."</li> <li>Amend all references to 'long term freshwater objectives' to read: "long term <a href="#">freshwater objectives</a>".</li> </ul>
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Area covered by Chapter 3.11	PC1-11254	Support in part	<ul style="list-style-type: none"> <li>The amendment is consistent with the definition of "freshwater objective" in the NPS-FM and will improve the clarity of PPC1.</li> </ul>	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>Amend all references to 'short term objectives' to read: "short term <a href="#">freshwater objectives</a>".</li> </ul>

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Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Map 3.11-1	PC1-3649	Oppose	<p>The submission does not include a copy of the proposed amended Map 3.11-1 or the proposed additional map, so potential further submitters are unable to assess the effects of the submission being allowed.</p> <p>PPC1 includes no definition of "lake", but the Waikato Regional Plan includes the following definitions:</p> <ul style="list-style-type: none"> <li>"Lake*: A body of fresh water which is entirely or nearly surrounded by land". (This is the same as the definition in the RMA, as at 10/9/2018).</li> <li>"Artificial lake: A constructed body of freshwater that is entirely surrounded by land and which is not on the alignment of a river or stream and has no natural inflows or headwaters".</li> </ul> <p>Stormwater ponds that are not on the alignment of a river or stream and have no natural inflows or headwaters are "artificial lakes", not "lakes", so are not captured by Rule 3.11.4.4 in PPC1, and this is not a problem.</p> <p>However, water bodies such as Magellan Lake in Hamilton City, although human-made, are not "artificial lakes" in terms of the Waikato Regional Plan, because they are on the alignment of a stream that has natural inflows or headwaters. Instead, they are "lakes" and subject to Rule 3.11.4.4 in PPC1. But this would appear to be an anomaly. Lake Magellan is, in fact, a consented on-line stormwater treatment device. The Lake, itself, is intended to provide treatment for stormwater runoff from an urban area so that the discharge from the lake meets consented water quality targets. However, under Rule 3.11.4.4 the influent to the lake would need to meet water quality targets, and additional stormwater treatment upstream of the artificial lake may be required. Retro-fitting further stormwater treatment into the catchment of the recently consented Magellan Lake would be challenging.</p>	I seek that the whole of the submission be disallowed.
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Background and explanation	PC1-10449	Support	<ul style="list-style-type: none"> <li>It is good practice to set out in a plan the overall strategy underpinning it, and for that explanation to inform the plan's interpretation and implementation.</li> </ul>	I seek that the whole of the submission be allowed.
Peter Volker	73690	162 Stanley Avenue, Te Aroha 3320.	Background and explanation	PC1-10283	Oppose	<ul style="list-style-type: none"> <li>This submission seeks amendments to PPC1 to require point source discharge consents to be reviewed at the beginning of PPC1 implementation.</li> <li>Significant point source discharges are already subject to consent conditions that manage the discharges' adverse environmental effects. Significant infrastructure and investment, for example, wastewater treatment plants or stormwater networks, are usually associated with these discharges. It would be unreasonable to terminate existing consents prematurely. Doing so could impose a significant unplanned financial burden on the municipalities and companies holding these consents. The staged approach to implementing PPC1 provides for existing investment in three-waters infrastructure to realise the return on that capital before investment in further infrastructure upgrades is required. The staging also allows time for the necessary forward planning and budgeting to occur for the future upgrades that will be required to meet the water quality targets.</li> </ul>	I seek that the whole of the submission be disallowed.
Brian Cox	70376	96 Hull Road, RD 2, Waiuku 2682	Co-management of the Waikato and Waipa Rivers	PC1-39	Support	<p>It is appropriate to explain the background to PPC1. The Vision and Strategy for the Waikato River is a key driver for PPC1. The submission simply seeks to retain the co-management section of PPC1.</p>	I seek that the whole of the submission be allowed.
Ravensdown Ltd	74058	C/o Planz Consultants, 8 Stafford St, Dunedin 9016. Attention: Carmen Taylor	Collaborative approach	PC1-10214	Support	<p>The collaborative approach to development of PPC1 is a significant part of the background to PPC1 that warrants inclusion in the plan.</p>	I seek that the whole of the submission be allowed.
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Water quality and National Policy Statement for Freshwater Management	PC1-11255	Support in part	<p>The amendments sought will improve PPC1's clarity and certainty.</p>	<p>I seek that the following parts of the submission be allowed:</p> <ul style="list-style-type: none"> <li>AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.</li> <li>AND AMEND all references to 'short term objectives' to read: "short term freshwater objectives"</li> </ul>
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Water quality and National Policy Statement for Freshwater Management	PC1-11255	Oppose in part	<ul style="list-style-type: none"> <li>The amendments sought are unnecessary and do not improve the clarity and certainty of PPC1.</li> <li>If the 80-year water quality attribute states listed in Table 3.11-1 were not regarded as "targets", then their significance would be diminished, and PPC1 would be weakened. If focus on achieving those states were lost, then even greater effort could be required in the future to achieve them. This would have more significant adverse economic and social effects than if they were identified as targets and kept in the regional community's sights.</li> <li>The 80-year water quality attribute targets in Table 3.11-1 are also freshwater objectives, so it is inappropriate to identify Objective 3 as "the" freshwater objective for PPC1.</li> <li>The amendments sought by the final bullet point in the next column are unclear: it is not clear which provisions the submission is seeking to amend, nor which alternative wording the submission is seeking for each provision.</li> <li>Section 75(3)(c) of the RMA requires HCC is to give effect to the Vision and Strategy for the Waikato River. Objective 2.2.9 of the Hamilton City District Plan is: "The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities".</li> </ul>	<p>I seek that the following parts of the submission be disallowed:</p> <ul style="list-style-type: none"> <li>AMEND all references to 'long term freshwater objectives' to read: "<del>long term freshwater objectives</del>"</li> <li>AND ADD to the Water Quality and National Policy Statement for Freshwater Management Section (page 14) a final sentence at the end that reads: "<del>For the avoidance of doubt, for the purpose of the National Policy Statement for Freshwater Management, the freshwater objective of this plan is Objective 3.</del>"</li> <li>AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <del>states</del>" or, where the context requires, to <i>Objective 1</i> and/or <i>Objective 3</i></li> </ul>

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Mercury NZ Limited	73182	PO Box 445, Hamilton 3240. Attention: Miles Rowe	Water quality and National Policy Statement for Freshwater Management	PC1-9496	Support	It is appropriate to explain the background to PPC1. The NPS-FM is another key driver for PPC1. The submission simply seeks to retain the co-management section of PPC1.	I seek that the whole of the submission be allowed.
Bruce Hathaway	73868	3344 State highway 5, Reporoa 3083	Full achievement of the Vision and Strategy will be intergenerational	PC1-3721	Oppose in part	• Significant point source discharges are already subject to consent conditions that manage the discharges' adverse environmental effects. Significant infrastructure and investment, for example, wastewater treatment plants or stormwater networks, are usually associated with these discharges. It would be unreasonable to terminate existing consents prematurely. Doing so could impose a significant unplanned financial burden on the municipalities and companies holding these consents. The staged approach to implementing PPC1 provides for existing investment in three-waters infrastructure to realise the return on that capital before investment in further infrastructure upgrades is required. The staging also allows time for the necessary forward planning and budgeting to occur for the future upgrades that will be required to meet the water quality targets.	I seek that the part of the submission that seeks amendments specifying that municipal and industrial discharge consents are to be reviewed at the beginning of PPC1 implementation, not when the current consents expire, be disallowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Full achievement of the Vision and Strategy will be intergenerational	PC1-10164	Support in part	Hamilton City Council (HCC) supports a staged approach for the reasons set out in the first three paragraphs under the heading "Full achievement of the Vision and Strategy will be intergenerational".	I seek for the following parts of the submission to be allowed: • RETAIN the provisions of PPC1 that are related to the staged approach to achieving the Vision and Strategy. • AND RETAIN the text referring to the overall intent of PPC1.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Full achievement of the Vision and Strategy will be intergenerational	PC1-10164	Oppose in part	Replacing "on farm" with "land based" has the potential to cause uncertainty regarding whether land-based activities that have point source discharges are required to make a start on reducing discharges of contaminants, or whether their point source discharges will be reviewed as their existing consent comes up for renewal.	I seek for the following part of the submission to be disallowed: • AND AMEND to provide a sector neutral approach in the first paragraph of 'Reviewing progress toward achieving the Vision and Strategy' to read: "The overall intent of Chapter 3.11...of achieving the Vision and Strategy, with <del>on-farm-land based</del> actions carried out and point source discharges..."
Bruce Hathaway	73868	3344 State highway 5, Reporoa 3083	Reviewing progress towards achieving the Vision and Strategy	PC1-3721	Oppose in part	• Significant point source discharges are already subject to consent conditions that manage the discharges' adverse environmental effects. Significant infrastructure and investment, for example, wastewater treatment plants or stormwater networks, are usually associated with these discharges. It would be unreasonable to terminate existing consents prematurely. Doing so could impose a significant unplanned financial burden on the municipalities and companies holding these consents. The staged approach to implementing PPC1 provides for existing investment in significant three-waters infrastructure to realise the return on that capital before investment in further infrastructure upgrades is required. The staging also allows time for the necessary forward planning and budgeting to occur for the future upgrades that will be required to meet the water quality targets.	I seek that the part of the submission that seeks amendments specifying that municipal and industrial discharge consents are to be reviewed at the beginning of PPC1 implementation, not when the current consents expire, be disallowed.
Mercury NZ Limited	73182	PO Box 445, Hamilton 3240. Attention: Miles Rowe	Reviewing progress towards achieving the Vision and Strategy	PC1-9499	Support	This section of PPC1 briefly sets out matters relevant to the need to review progress towards achieving the Vision and Strategy, namely, the overall intent of PPC1, periodic review of the Vision and Strategy and Regional Plan, and monitoring. This is appropriate and useful background and explanation for plan users.	I seek that the whole of the submission be allowed.
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	3.11.1 Values and uses of the Waikato and Waipa Rivers	PC1-2984	Support in part	• HCC supports retention of the values listed in this further submission point. • HCC's original submission has sought amendments to the other values.	I seek the parts of the submission relating to the following values be allowed: • Intrinsic values - History • Intrinsic values - Natural form and character • Use values - Wai tapu • Use values - Geothermal • Use values - Mahinga kai • Use values - Human health for recreation • Use values - Transport and tauranga waka • Use values - Electricity generation
Watercare Services Ltd	74077	Private Bag 92 521, Wellesley Street, Auckland 1141. Attention: Mark Bourne	3.11.1 Values and uses of the Waikato and Waipa Rivers	PC1-8341	Support	• Clarifying the matters identified in the submission will improve PPC1's clarity and certainty. • HCC agrees that an additional value statement is needed to recognise the importance of the rivers for the assimilation of municipal stormwater and wastewater and the contribution this makes to the social, economic and cultural well-being, health and safety of residents of each municipality.	I seek that the whole of the submission be allowed.
Mercury NZ Limited	73182	PO Box 445, Hamilton 3240. Attention: Miles Rowe	Te Mana o te Wai: Mana Atua, Mana Tangata	PC1-9503	Support in part	This section of PPC1 includes a narrative and graphic description of Te Mana o te Wai which will aid plan users' understanding of PPC1.	I seek the parts of the submission relating to page 21 of PPC1 be allowed.
Dorreen, Ian David and Bronwyn Nugent	73991	178 Limeworks Loop Road, Te Pahu, RD5	Identity and sense of place through the interconnections of land with water	PC1-8515	Oppose	HCC supports retention of this value, recognising that Waikato-Tainui descendants and many other Hamilton residents have important relationships with the Waikato River, and their identity, sense of home, lifestyle and life memories are associated with the river after which the region is named. Many sports teams representing the region include "Waikato" in their names reflecting identity through the interconnection of land with the river.	I seek that the whole submission be disallowed.
Heritage New Zealand Pouhere Taonga	68939	P O Box 13339, Tauranga 3141. Attention: Carolyn McAlley	Intrinsic values - History	PC1-3091	Support	HCC's District Plan contains policies relating to promoting an integrated approach to managing the historic resources of the Waikato River (2.2.9b) and protection of historic heritage (2.2.10d).	I seek that the whole of the submission be allowed.

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Intrinsic values - Ecosystem health	PC1-8139	Oppose	<ul style="list-style-type: none"> <li>The submission suggests no alternative wording for the value, so the effects of allowing the submission are unclear and uncertain.</li> <li>Artificial flood storage can play a vital role attenuating flood peaks and minimising erosion in waterways, which benefit aquatic ecosystems.</li> <li>In addition, natural and artificial wetlands could be important methods for improving the quality of stormwater discharged from urban areas. Stormwater containing contaminants will be discharged to the wetlands, and the natural processes within the wetlands will result in the discharge from the wetlands to the receiving waterways having improved water quality attributes.</li> <li>It needs to be clear whether any reference in PPC1 to "wetland" refers or applies to a natural wetland, a human-made wetland, or both. HCC expects to use human-made wetlands extensively throughout Hamilton City to manage stormwater runoff and its potential adverse effects. If insufficient care is taken in drafting PPC1, human-made wetlands could be caught by plan provisions intended for natural wetlands only. Such provisions might severely inhibit the operation, maintenance, efficiency and effectiveness of the human-made wetlands.</li> </ul>	I seek that the whole submission be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Intrinsic values - Natural form and character	PC1-8152	Support in part	The Waikato River is an outstanding natural feature in Hamilton City. The river and its margins contain significant habitats of indigenous fauna and vegetation, and it is recognised at an area of high amenity value. The Hamilton District Plan includes Objective 2.2.11: <i>"Protect and enhance natural character, natural features and landscapes, ecosystems and indigenous biodiversity"</i> .	I seek that the following part of the submission be allowed: RETAIN the Intrinsic value Natural form and character.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Use values - Wai tapu	PC1-8532	Support in part	<ul style="list-style-type: none"> <li>HCC recognises the rivers are places for sacred ritual, healing, cleansing and spiritual nurturing.</li> <li>Except for near the mouth of the Waikato River, the coastal environment does not fall within the scope of PPC1.</li> <li>It is not clear to me whether natural wetlands are used for sacred purposes. It is unlikely that artificial wetlands developed to clean and manage urban stormwater will be used for sacred ritual.</li> </ul>	I seek that the part of the submission supporting the use value as notified be allowed, and the part of the submission seeking its amendment be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Use values - Mahinga kai	PC1-8533	Support in part	<ul style="list-style-type: none"> <li>Mahinga kai are important and should be recognised in PPC1. They provide food or natural resources that sustains human life. They also provide a setting for customary practices and the inter-generational transfer of cultural knowledge, which are important components of culture, life-style and identity.</li> <li>The coastal environment outside the Waikato River catchment does not fall within the scope of PPC1.</li> <li>Artificial wetlands developed to clean and manage urban stormwater should not be expected to function as mahinga kai.</li> </ul>	I seek that the submission be allowed, except the parts of the submission seeking for the value to extend to coastal areas outside the Waikato River catchment and human-made wetlands in urban areas, which I seek to be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Use values - Human health for recreation	PC1-8535	Support in part	<ul style="list-style-type: none"> <li>The rivers are valued for their amenity. People enjoy walking, cycling, picnicking and relaxing beside the rivers. People also connect with the rivers through swimming, waka, waka-ama, boating, water skiing, fishing and mahinga kai. They value being able to undertake these activities in an environment that poses minimal risk to their health.</li> <li>The coastal environment outside the Waikato River catchment does not fall within the scope of PPC1.</li> <li>Artificial wetlands developed to clean and manage urban stormwater should not be expected to be places where the water is expected to be safe for human contact.</li> </ul>	I seek that the submission be allowed, except the parts of the submission seeking for the value to extend to coastal areas outside the Waikato River catchment and human-made wetlands in urban areas, which I seek to be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Use values - Transport and tauranga waka	PC1-8540	Support in part	<ul style="list-style-type: none"> <li>The use of the rivers for navigation, including for recreational, sporting and cultural purposes, should be recognised.</li> <li>Wetlands are generally not used for navigation.</li> <li>The coastal environment outside the Waikato River catchment does not fall within the scope of PPC1.</li> </ul>	I seek that the submission be allowed, except the parts of the submission seeking for the value to extend to coastal areas outside the Waikato River catchment and human-made wetlands in urban areas, which I seek to be disallowed.
Mercury NZ Limited	73182	PO Box 445, Hamilton 3240. Attention: Miles Rowe	Use values - Electricity generation	PC1-11308	Support	<ul style="list-style-type: none"> <li>The Waikato River is used to generate hydro-electricity and for cooling at the Huntly thermal power station.</li> <li>Electricity generation is necessary for the social, economic and cultural well-being, health and safety of residents of people and communities.</li> </ul>	I seek that the whole of the submission be allowed.
Auckland/ Waikato Fish and Game and Eastern Region Fish and Game	74085	c/o Ben Wilson, 156 Brymer Road, RD 9, Hamilton 3289	3.11.2 Objectives	PC-10790	Oppose in part	<ul style="list-style-type: none"> <li>The proposed new objective refers to "All wetlands within the Waikato and Waipa catchments". "All wetlands" includes human-made wetlands as well as natural wetlands. HCC expects to use human-made wetlands extensively throughout Hamilton City to manage stormwater runoff and its potential adverse effects, so as to help achieve the Vision and Strategy for the Waikato River. If insufficient care is taken in drafting PPC1, human-made wetlands could be caught by plan provisions intended for natural wetlands only. Such provisions might severely inhibit the operation, maintenance, efficiency and effectiveness of the human-made wetlands.</li> </ul>	I seek that the parts of the submission seeking the addition of a new objective relating to artificial wetlands within the Waikato and Waipa catchments be disallowed.
Roderick Francis David Aldridge	73788	33A Barrie Crescent, Silverdale, Hamilton 3216	3.11.2 Objectives	PC1-7873	Oppose	In effect, the submission seeks to add more attributes to Table 3.11-1. The implications of the unspecified additional short and long term numerical water quality targets have not been assessed, are unclear and uncertain.	I seek that the whole submission be disallowed.
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taro Rawiri	Objective 6	PC1-7769	Support	HCC supports implementation of Lake Management Plans to move towards meeting targets but would like it noted that the development of a plan and implementation may take some time.	I seek that the proposed new objective requiring implementation of Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years be allowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Objective 1	PC1-10535	Oppose	The submission seeks amendments, but includes no suggested wording or specific alternative water quality attributes for lakes; it lacks clarity and certainty.	I seek that the whole submission be disallowed.

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
Population Health	73996	Waikato District Health Board, Private Bag 3200, Hamilton 3400. Attention: Richard Wall	Objective 1	PC1-4861	Oppose	The Collaborative Stakeholder Group, when developing PPC1, settled on the objective of achieving the long term water quality targets by 2096. This was considered a reasonable and realistic timeframe to effect the land use changes that are necessary, while sustaining the ability of people and communities to provide for their social, economic and cultural wellbeing. • Requiring these targets to be achieved in a shorter timeframe will put additional financial and social stress on people and communities, which may be unsustainable. The 80 year time frame takes account of legacy ground water science.	I seek that the whole submission be disallowed
Ravensdown Ltd.	74058	C/o Planz Consultants, 8 Stafford St, Dunedin 9016. Attention: Carmen Taylor	Objective 1	PC1-10096	Oppose	The meaning is unclear	I seek that the whole submission be disallowed.
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroai Rawiri	Objective 1	PC1-7456	Oppose in part	<ul style="list-style-type: none"> <li>• The Collaborative Stakeholder Group, when developing PPC1, settled on the objective of achieving the long term water quality targets by 2096. This was considered a reasonable and realistic timeframe to effect the landuse changes that are necessary, while sustaining the ability of people and communities to provide for their social, economic and cultural wellbeing.</li> <li>• Requiring these targets to be achieved in a shorter timeframe will put additional financial and social stress on people and communities, which may be unsustainable.</li> <li>• There will be an opportunity to review the 80 year target each time the regional plan is reviewed. If future data shows water quality improvements are exceeding expectations, there may then be a case for reducing the timeframe for achieving the long terms targets.</li> <li>• Including the words "where practicable" could create conflict with Policy 11, which requires adoption of "the best practicable option" to manage contaminant discharge. The former would require an action to be taken, if it were possible to do so; whereas the best practicable option allows consideration of other matters, including the financial implications of the action. For example, it may be possible to achieve a high removal rate of a contaminant, but doing so may be too expensive for a community to sustain.</li> </ul>	I seek that the following part of the submission be disallowed: • AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable,</u> discharges of nitrogen..."
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Objective 1	PC1-8218	Oppose	• The Collaborative Stakeholder Group, when developing PPC1, settled on the objective of achieving the long term water quality targets by 2096. This was considered a reasonable and realistic timeframe to effect the landuse changes that are necessary, while sustaining the ability of people and communities to provide for their social, economic and cultural wellbeing. Requiring these targets to be achieved in a shorter timeframe will put additional financial and social stress on people and communities, which may be unsustainable.	I seek that the whole submission be disallowed.
Waikato Environment Centre	73436		Objective 1	PC1-6232	Oppose	HCC does not understand what the submitter seeks	I seek that the whole of the submission be disallowed.
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Objective 1	PC1-2985	Oppose in part	No proposed wording is included, so the submission lacks clarity and certainty.	I seek that the part of the submission that seeks amendments to acknowledge climate change be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Objective 2	PC1-10537	Oppose	<ul style="list-style-type: none"> <li>• The submission seeks amendments, but includes no suggested wording; it lacks clarity and certainty.</li> <li>• It is not necessary for the objective to reflect the full scope and meaning of "sustainable management".</li> <li>• Inclusion of the words "to continue" does not imply the objective is for particular activities to continue, or continue at any particular level. Rather, the objective is to enable continuation of the ability of people and communities to provide for their social, economic and cultural wellbeing. Such an interpretation is reinforced by the reasons for adopting Objective 2 set out in PPC1.</li> </ul>	I seek that the whole submission be disallowed.
Ravensdown Ltd.	74058	C/o Planz Consultants, 8 Stafford St, Dunedin 9016. Attention: Carmen Taylor	Objective 2	PC1-10097	Oppose	The meaning is unclear	I seek that the submission be disallowed.
Waikato Environment Centre	73436	PO Box 19104, Hamilton 3244. Attention: Sonia Fursdon	Objective 2	PC1-6233	Oppose	HCC does not understand what the submitter seeks	I seek that the whole of the submission be disallowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Objective 3	PC1-10168	Oppose	HCC prefers the alternative wording of Objective 3 contained in HCC's original submission point PC1-10211, for the reasons set out in that submission.	I seek that the whole of the submission be disallowed.
Waipa District Council	67704	Private Bag 2402, Te Awamutu 3840. Attention: David Totman	Objective 3	PC-3159	Oppose	The amendment sought would have the effect of requiring the 10% water quality improvement achieved by 2026. This ignores the lag period resulting from the contaminant load already in the groundwater.	I seek that the whole of the submission be disallowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Objective 4	PC1-10193	Oppose	HCC prefers the alternative wording of Objective 4 contained in HCC's original submission point PC1-10226, for the reasons set out in that submission.	I seek that the whole of the submission be disallowed.
Oji Fibre Solutions (NZ) Ltd	73725	C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742	Principal reasons for adopting Objectives 1-6	PC1-6392	Oppose	<ul style="list-style-type: none"> <li>• It is desirable to include reasons for adopting the objectives; the reasons help plan users understand each objective and its intent. Accordingly, deleting the reasons would not improve PPC1's clarity and certainty.</li> <li>• The amendments to this provision the submission is seeking as alternative relief are unclear.</li> </ul>	I seek that the whole submission be disallowed.

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Reasons for adopting Objective 1	PC1-10622	Support in part	<ul style="list-style-type: none"> <li>The NPS-FM defines "attribute" as "a measurable characteristic of fresh water, including physical, chemical and biological properties, which supports particular values". The attributes listed in PPC1 include: "Annual Median Chlorophyll a", "Annual Maximum Chlorophyll a", "Annual Median Total Nitrogen", etc. The numerical values listed in Table 3.11-1 are not the "attributes", per se, but "attribute states". As indicated in Appendix 2 of the NPS-FM, attribute states can be described by a letter (A,B,C, D or E), "National Bottom Line", a numeric value, or a narrative description. Accordingly, it is more appropriate to refer to "The water quality states listed in Table 3.11-1" than "The water quality attributes".</li> <li>The amendments this further submission supports will improve the clarity of PPC1.</li> </ul>	I seek that only the parts of the submission seeking the following amendments be allowed:  <i>Objective 1 sets long term limits<sup>A</sup> for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year water quality targets, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality <del>states</del> <del>attributes</del><sup>A</sup> listed in Table 3.11-1 that will be achieved by 2096 will be used to characterise the <u>desired</u> water quality of the different FMUs when the effectiveness of the objective is assessed. <u>Objective 1 gives effect to the Vision and Strategy.</u></i>
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Reasons for adopting Objective 1	PC1-10622	Oppose in part	<ul style="list-style-type: none"> <li>By referencing Table 3.11-1, which identifies water quality limits, Objective 1 effectively sets those limits. Accordingly, it is inappropriate to amend the first sentence of "Reasons for adopting Objective 1" by replacing the plural "long term limits" with the singular "a long term goal". That proposed change is inconsistent with the proposed amendments to the second sentence, which state that Objective 1 sets more than one thing.</li> <li>The use of the term "targets" in the notified second sentence of "Reasons for adopting Objective 1" is consistent with its definition in the NPS-FM, namely, "'Target' is a limit which must be met at a defined time in the future. This meaning only applies in the context of over-allocation". It is not necessary to replace "water quality targets" with "desired water quality states".</li> <li>If the 80-year water quality attribute states listed in Table 3.11-1 were not regarded as "targets", then their significance would be diminished, and PCC1 would be weakened. If focus on achieving those states were lost, then even greater effort could be required in the future to achieve them. This would have more significant adverse economic and social effects than if they were identified as targets and kept in the regional community's sights.</li> <li>Section 75(3)(c) of the RMA requires HCC is to give effect to the Vision and Strategy for the Waikato River. Objective 2.2.9 of the Hamilton City District Plan is: "The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities".</li> </ul>	I seek that the parts of the submission seeking amendments to the first two sentences of "Reasons for adopting Objective 1" be disallowed.
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Reasons for adopting Objective 2	PC1-10623	Oppose	<ul style="list-style-type: none"> <li>The amendments sought are unnecessary and do not improve the clarity and certainty of PPC1.</li> <li>If the 80-year water quality attribute states listed in Table 3.11-1 were not regarded as "targets", then their significance would be diminished, and PCC1 would be weakened. If focus on achieving those states were lost, then even greater effort could be required in the future to achieve them. This would have more significant adverse economic and social effects than if they were identified as targets and kept in the regional community's sights.</li> <li>Section 75(3)(c) of the RMA requires HCC is to give effect to the Vision and Strategy for the Waikato River. Objective 2.2.9 of the Hamilton City District Plan is: "The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities".</li> </ul>	I seek that the whole submission be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Reasons for adopting Objective 4	PC1-8233	Oppose	The amendments to this provision the submission is seeking are unclear; no amended wording is suggested.	I seek that the whole submission be disallowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Reasons for adopting Objective 3	PC1-10189	Support	The proposed amendments improve the Plan's clarity and consistency.	I seek that the whole of the submission be allowed.
Fulton Hogan Limited	74048	C/- Boffa Miskell Limited, PO Box 91-250, Auckland 1142. Attention: Sharon Dines.	3.11.3 Policies	PC1-10748	Support in part	The part of the submission that this further submission supports will provide point source discharges with alternatives to consent conditions for securing offset measures for the duration of the discharge consent.	I seek that the following part of the submission be allowed. The part that specifies that "another legally binding mechanism" could be an alternative to a consent condition for ensuring that an offset measure remains in place for the duration of the relevant point source discharge consent.
Population Health	73996	Waikato District Health Board, Private Bag 3200, Hamilton 3400. Attention: Richard Wall	3.11.3 Policies	PC1-4862	Oppose in part	<ul style="list-style-type: none"> <li>The Collaborative Stakeholder Group, when developing PPC1, settled on the objective of achieving the long term water quality targets by 2096. This was considered a reasonable and realistic timeframe to effect the landuse changes that are necessary, while sustaining the ability of people and communities to provide for their social, economic and cultural wellbeing.</li> <li>Requiring these targets to be achieved in a shorter timeframe will put additional financial and social stress on people and communities, which may be unsustainable.</li> </ul>	I seek that the following part of the submission be disallowed: the part that seeks the policies be amended to achieve targets in a shorter timeframe.
Peter Volker	73690	162 Stanley Avenue, Te Aroha 3320.	3.11.3 Policies	PC1-10288	Oppose in part	<ul style="list-style-type: none"> <li>The new policy proposed in the submission would prevent the use of offset measures, for which Policy 11 provides.</li> <li>The ability to implement offset measures should be retained.</li> <li>Offset measures will be an important tool, which will help achieve the long-term water quality targets.</li> </ul>	I seek that the following part of the submission be disallowed: the part that seeks a new policy stating that an increase in water quality in one part of a catchment does not mean there can be a decrease in water quality in another part.

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Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penter	3.11.3 Policies	PC1-11560	Oppose	<ul style="list-style-type: none"> <li>Despite the application of the Best Practicable Option to manage a contaminant discharge, it is possible that urban development that is necessary to give effect to the Waikato Regional Policy Statement, for example, may result in a net increase in one or more of the four target contaminants at any particular discharge point.</li> <li>However, Policy 11 provides for implementing offset measures elsewhere to counter the increased contaminant load.</li> <li>HCC's original submission (PC1-10758) seeks amendments to Policy 11 that would ensure, when offset measures are used, a net improvement in water quality in a specified sub-catchment or Freshwater Management Unit that exceeds the residual adverse effects of allowing a contaminant discharge.</li> <li>Any new provision to manage potential increase in contaminant discharge, such as that sought by the submitter, needs to be carefully drafted so as to avoid having the effect of preventing necessary development and land use activities.</li> </ul>	I seek that the whole submission be disallowed.
Watercare Services Ltd	74077	Private Bag 92 521, Wellesley Street, Auckland 1141. Attention: Mark Bourne	3.11.3 Policies	PC1-8455	Support in part	Allowing the submission will improve PPC1's clarity and certainty.	I seek that the following part of the submission be allowed: Amend the objectives and policies to clearly identify the objectives and policies that apply to farming activities and those that apply to municipal discharges.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Policy 1	PC1-10196	Oppose in part	Including "and point sources" as proposed in the submission would set up conflict between amended Policy 1 (a) and Policy 11 and result in loss of clarity and certainty. The former policy would enable point source discharges with a low level of contaminant discharge to water bodies (provided those discharges don't increase), whereas the latter requires adoption of the Best Practicable Option to avoid or mitigate the adverse effects of a point source discharge.	I seek for the following part of the submission to be disallowed: AMEND Policy 1 to read: "Policy 1: Manage diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens/ Te Kaupapa..."
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Policy 1	PC1-8236	Support	Clarification of the meaning of "low level of contamination" will improve PPC1's clarity and certainty.	I seek that the whole submission be allowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Policy 5	PC1-10228	Support	Adopting a staged approach recognises the challenges involved in achieving the 80 year water quality targets and allows time for affected stakeholders to transition to different ways of operating that discharge less contaminants.	I seek that the whole of the submission be allowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Policy 5	PC1-10661	Oppose	<ul style="list-style-type: none"> <li>The submission seeks amendments, but includes no suggested wording; it lacks clarity and certainty.</li> <li>Future Plan reviews will identify how further, necessary water quality improvements will be achieved.</li> </ul>	I seek that the whole submission be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Policy 5	PC1-8257	Oppose	The Collaborative Stakeholder Group, when developing PPC1, settled on the objective of achieving the long term water quality targets by 2096. This was considered a reasonable and realistic timeframe to effect the landuse changes that are necessary, while sustaining the ability of people and communities to provide for their social, economic and cultural wellbeing. Requiring these targets to be achieved in a shorter timeframe will put additional financial and social stress on people and communities, which may be unsustainable.	I seek that the whole submission be disallowed.
Waikato Environment Centre	73436	PO Box 19104, Hamilton 3244. Attention: Sonia Fursdon	Policy 5	PC1-6235	Oppose	HCC does not understand what the submitter seeks.	I seek that the whole submission be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Policy 6	PC1-10664	Oppose	<ul style="list-style-type: none"> <li>The relief sought does not identify how Policy 6 would be amended, so is unclear and uncertain.</li> <li>The alternative relief sought, namely, introducing a prohibited activity rule to avoid adverse effects of land use change on water quality, could have the effect of preventing new urban development that is required to give effect to the Regional Policy Statement.</li> </ul>	I seek that the whole submission be disallowed.
Matamata Piako District Council	73419	PO Box 266, Te Aroha 3342. Attention: Mark Hamilton	Policy 6	PC1-3494	Oppose in part	HCC wants the first sentence retained and amended as set out in HCC's original submission PC11-10262.	I seek the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>Delete the first sentence of Policy 6.</li> </ul>
Rotorua Lakes Council	73373	1061 Haupapa Street, Rotorua 3046. Attention: Chris Dillon	Policy 6	PC1-2504	Support in part	Policies 10, 11 and 12 identify additional activities which may involve land use change that could increase discharge of the four contaminants, but which should be granted consent regardless. They include, but not exclusively, discharges from regionally significant infrastructure (Policy 10) and point source discharges for which the best practicable option and/or offset measures have been applied (Policy 11).	I seek the parts of the submission that seek the following amendments be allowed: <ul style="list-style-type: none"> <li>Except as provided for in Policies <u>10, 11, 12 and 16</u>, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens, will generally not be granted.</li> </ul>
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroi Rawiri	Policy 6 - Restricting Land use change	PC1-7848	Oppose	<ul style="list-style-type: none"> <li>The implications of the word changes are unclear.</li> <li>The new definition of "sustained" - "means [a] ... decrease", is not appropriate for the first part of the proposed amendment, which refers to a sustained "increase".</li> </ul>	I seek that the whole submission be disallowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Policy 7	PC1-10229	Oppose in part	<ul style="list-style-type: none"> <li>The submission point seeks deletion of principles HCC thinks should be considered when assessing future allocation of waterways' contaminant assimilative capacity.</li> <li>HCC's submission seeks addition of a new principle to Policy 7.</li> <li>These principles inform identification of the information that needs to be collected and researched to support future allocation of the rivers' contaminant assimilative capacity.</li> </ul>	I seek for the following parts of the submission to be disallowed: <ul style="list-style-type: none"> <li>Delete Policy 7 (c) and (d).</li> </ul>
Matamata Piako District Council	73419	PO Box 266, Te Aroha 3342. Attention: Mark Hamilton	Policy 7	PC1-3497	Oppose in part	<ul style="list-style-type: none"> <li>Deletion of the first paragraph would remove the heart and substance of the policy, which is to take actions, such as collecting information, developing modelling tools and undertaking research, to prepare for future allocations.</li> </ul>	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>Delete the first paragraph of Policy 7.</li> </ul>

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Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)	74105	PO Box 848, Hamilton 3240. Attention: Taroi Rawiri	Policy 7	PC1-7850	Support in part	<ul style="list-style-type: none"> <li>If the decisions on submissions and further submissions were to amend Policy 7 to allow one or more alternatives to the "land suitability" approach to managing discharges of the four target contaminants, then HCC would want the principle "minimising social disruption and costs in transition to" the new approach(es) to be considered when the new allocation is developed.</li> <li>This principle will inform identification of the information that needs to be collected and researched to support future allocation of the rivers' contaminant assimilative capacity.</li> </ul>	I seek for the following part of the submission to be allowed: <ul style="list-style-type: none"> <li>AMEND Policy 7(c) to read: "<i>c.Minimise social disruption and costs in transition to <del>land suitability</del> any new approach</i>".</li> </ul>
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Policy 7	PC1-6236	Support in part	<ul style="list-style-type: none"> <li>It would be irresponsible to ignore new data and knowledge when developing future allocation of the rivers' assimilative capacity.</li> <li>This principle will inform identification of the information that needs to be collected and researched to support future allocation of the rivers' contaminant assimilative capacity.</li> </ul>	I seek for the part of the submission that seeks for Policy 7 (d) to be retained to be allowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Policy 8	PC1-10670	Support in part	<ul style="list-style-type: none"> <li>Identifying lakes as Priority 1 in Table 3.11-2 would result in action being taken earlier (in accordance with Policy 8 and Method 3.11.4.4) to improve their water quality.</li> <li>Lake Rotoroa is a very popular destination for Hamilton residents and visitors and is well used for boating - yachting, waka ama, dragon boating and model boat operation. Lake users would benefit from improved lake water quality.</li> <li>Having lake catchment management plans prepared early would enable them to inform the relevant Integrated Catchment Management Plans, which HCC will prepare for the larger sub-catchments within which the lake sub-catchments are located. HCC has a programme to prepare an ICMP for each catchment in the City.</li> <li>Listing the sub-catchments of Lakes Rotoroa, Rotokaeo, Waiwhakareke and Rotokauri in Table 3.11-2 would improve the clarity and certainty that the sub-catchments of these lakes will be prioritised for the management of land and water resources. Although Policy 8(b) states the Lakes Freshwater Management Units are priority areas, the first part of Policy 8 indicates that areas have to be set out in Table 3.11-2 for the management of land and water resources within those areas to be prioritised.</li> </ul>	I support the part of the submission that would require the sub-catchments of the three natural lakes in Hamilton City (Lakes Rotoroa, Rotokaeo and Waiwhakareke) and Lake Rotokauri (which lies outside the City but receives drainage from it) being included as Priority 1 in Table 3.11-2.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Policy 9	PC1-10671	Support in part	The amendments sought will improve the clarity and certainty of PPC1.	I seek that the following parts of the submission be allowed: <ul style="list-style-type: none"> <li>Clarification around the method(s) of support that the policy intends to provide for efficient and effective water quality improvements.</li> <li>Replace "mitigations" with "mitigation measures" to more appropriately reflect the terminology used in the Resource Management Act.</li> </ul>
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Policy 9	PC1-10671	Oppose in part	<ul style="list-style-type: none"> <li>Deletion of the second sentence is unnecessary; it is a valid policy.</li> <li>Clarification in the policy of the form of, and timeframe for, engagement is unnecessary.</li> <li>The amendments sought to subsection (c) would result in a policy requiring prioritisation of mitigation measures with the greatest environmental outcomes and high cost options. The resulting policy could be in conflict with Policy 11, which requires adoption of the Best Practicable Option to manage the adverse effects of contaminants. It could result in a loss of clarity and certainty.</li> </ul>	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>Removal of the wording: "<i>Support measures that efficiently and effectively contribute to water quality improvements</i>".</li> <li>Greater clarification is needed on what form engagement will take and a timeframe for when this can be expected to occur for each priority area category.</li> <li>Ensure subsection c be amended to ensure that those mitigation measures with the greatest environmental outcomes are prioritised and acknowledging that this could require high cost options to achieve desired outcomes.</li> </ul>
Reese, Kate and Aaron	72961	Kainui Ranges Ltd, 646 Ponganui Road, Onewhero RD2, Tuakau 2697	Policy 9	PC1-7838	Support	Research projects investigating new cost-effective methods and technologies to improve water quality that would benefit the Waikato Region warrant support.	I seek that the whole submission be allowed.
Auckland/ Waikato Fish and Game and Eastern Region Fish and Game	74085	c/o Ben Wilson, 156 Brymer Road, RD 9, Hamilton 3289	Policy 10	PC1-10884	Oppose	HCC opposes this submission because legislation such as the Local Government Act and Health Act requires HCC to carry out municipal activities that involve discharge of contaminants. It is essential that PPC1 provides for the continued operation of regionally significant infrastructure and regionally significant industry. The continued operation of these facilities is necessary to enable people and communities to provide for their social, economic and cultural well-being and for their health and safety.	I seek that the whole submission be disallowed.
Oil companies	73716	PO Box 33-817, Takapuna, Auckland 740. Attention: David le Marquand	Policy 10	PC1-2593	Oppose	The amendment would remove the policy that enables municipalities to carry out municipal activities resulting in point source discharges. The plan also needs to give effect to the Waikato Regional Policy Statement which recognises regionally significant infrastructure is recognised.	I seek that the whole of the submission be disallowed.
Okell, Robert Steven	71079	1847 State Highway 30, RD 1, Guthrie, Rotorua 3077	Policy 10	PC1-182	Oppose	HCC opposes this submission point on the basis that there are adequate controls in place to manage point source discharges through the application of policy 11.	I seek that the whole submission "AMEND Policy 10 to increase the controls placed on point source discharges" be disallowed.
Oliver, William and Karen	73021	1240 Rangitoto Road, RD2, Te Kuiti 3982	Policy 10	PC1-7316	Oppose	HCC opposes the first part of the submission based on multiple stormwater point source discharges, all of which can not be measured and monitored except through receiving environment monitoring. HCC opposes the second part of the proposed amendment because it is unclear.	I seek that the whole submission be disallowed.
Oliver, William and Karen	73021	1240 Rangitoto Road, RD2, Te Kuiti 3982	Policy 10	PC1-9401	Oppose	consent terms of point source discharges allow review and it takes significant time to carry out assessment of effects. Regionally significant infrastructure is provided for in the RPS. While HCC supports a sub catchment approach, it is understood that this plan change is to reflect the NPS -FWM and Vision & Strategy with a strong focus on swimability and food gathering, therefore reference to "all" contaminants would mean a significant delay to putting measures in place to improve the river for those matters of high importance at this time.	I seek that the whole submission be disallowed.

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
Pamu Farms of New Zealand	74000	Landcorp Farming Limited, Level 2, 15 Allen Street, Te Aro, Wellington 6011. Attention: Robert van Duivenboden	Policy 10	PC1-5757	Oppose	Further understanding is needed. There are systems in place to manage illegal cross connections. Private stormwater discharges are managed by WRC. To redirect all private stormwater discharges may not yield anticipated benefits. HCC opposes deletion of Policy 10 because the policy ensures that HCC has the ability to carry out its municipal activities required of it under other legislation such as the Local Government Act and Health Act.	I seek that the whole submission be disallowed:
Reeves and Taylor, James Gordon Livingston and Amy Louise	71614	195 Crawford Road, RD8, Hamilton 3288	Policy 10	PC1-8556	Oppose	The Plan must give effect to the Waikato Regional Policy Statement Policy 4.4 ("The management of natural and physical resources provides for the continued operation and development of regionally significant industry and primary production activities by: ....).	I seek that the whole submission "DELETE Policy 10 in its entirety" be disallowed
Save Lake Karapiro Inc	72459	110 Tower Road, RD 1, Matamata 3471. Attention: Angus Robson	Policy 10	PC1-5693	Oppose	The submission is unclear	I seek that the whole submission be disallowed.
Taupo District Council	74207	Private Bag 2005, Taupo Mail Centre, Taupo 3352. Attention: David J Trewavas	Policy 10	PC1-6519	Support in part	The amendment will improve clarity and certainty	I seek that the part of the submission "AMEND to ensure the that definition of regionally significant infrastructure includes storm water infrastructure" be allowed.
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroi Rawiri	Policy 10	PC1-7883	Oppose	"Have regard" is not aligned with the Waikato Regional Policy Statement Policy 4.4.1.	I seek that the whole submission point be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Policy 10	PC1-8263	Oppose in part	HCC opposes this on the basis that Regionally significant infrastructure and industry are necessary to provide for the social, economic, environmental and cultural welling of the regional community. The contaminant discharges from these activities will be managed by resource consent conditions.	I seek that the following parts of the submission be disallowed: <ul style="list-style-type: none"> <li>• "DELETE Policy 10</li> <li>• OR AMEND to define regionally significant infrastructure</li> <li>• AND REMOVE industry from Policy 10" be disallowed.</li> </ul>
Tirohanga Settlers and Sports Association	71751	The Secretary, 113 Paerata Road, RD1, Atiamuri 3078. Attention: Colin Dunstan	Policy 10	PC1-7102	Oppose	<ul style="list-style-type: none"> <li>• The amendments sought are unnecessary and would add nothing to the Plan.</li> <li>• Discharges from gutters and streets are point source discharges, for which the Plan already provides.</li> </ul>	I seek that the whole submission point be disallowed.
Trustees of Highfield Deer Park	73932	8 Wymer Terrace, Chartwell, Hamilton 3210. Attention: Kelly Nicolson	Policy 10	PC1-3978	Support	Including definitions of "regionally significant infrastructure" and "regionally significant industry" in PPC1 will improve the Plan's clarity and certainty.	I seek that the whole submission point be allowed.
Wallace, Martin Lindsay	72975	241 Harbottle Road, RD2, Morrinsville 3372	Policy 10	PC1-8357	Oppose	HCC opposes this submission because legislation such as the Local Government Act and Health Act requires HCC to carry out municipal activities that involve discharge of contaminants. It is essential that PPC1 provides for the continued operation of regionally significant infrastructure and regionally significant industry. The continued operation of these facilities is necessary to enable people and communities to provide for their social, economic and cultural well-being and for their health and safety.	I seek that the submission point "DELETE Policy 10" be disallowed.
Ward, Bruce	73286	1290 Waipapa Road, RD7, Te Awamutu 3877	Policy 10	PC1-7375	Oppose	<ul style="list-style-type: none"> <li>• The continued operation of regionally significant infrastructure and industry is necessary to enable people and communities to provide for their social, economic and cultural well-being and for their health and safety.</li> <li>• Policy 10 does not exist in isolation; regionally significant infrastructure and industry is still subject to the objectives and other relevant policies in PPC1, including, for example, Policy 11 (requiring adoption of the best practicable option to manage contaminants, and allowing the use of offset measures).</li> </ul>	I seek that the submission "DELETE Policy 10 and require regionally significant infrastructure and industry to comply with the plan rules by 1 July 2026" be disallowed.
Wilson, Mark	73923	31 Wilson Road, RD2, Taupiri 3792	Policy 10	PC1-5185	Oppose in part	HCC's original submission PC1-11038 seeks a consent term of 35 years for municipal discharges. Accordingly, HCC opposes limiting the consent terms to 25 years for municipal discharges. The investment required to ensure municipal discharges meet the water quality targets will be significant - of the order of tens or hundreds of millions of dollars. In addition, given the complexity of the matters, the consenting process is likely to have a significant cost as well. If a discharge is predicted to meet the water quality targets for the duration of the consent, It is appropriate to provide a long consent period in order to provide certainty for municipal authorities and the communities they serve.	I seek that the part of the submission that seeks "AMEND to provide for 25 year consents" be disallowed.

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Auckland/ Waikato Fish and Game and Eastern Region Fish and Game	74085	c/o Ben Wilson, 156 Brymer Road, RD 9, Hamilton 3289	Policy 11	PC1-10887	Oppose	<ul style="list-style-type: none"> <li>An adverse environmental effect could be mitigated, that is, moderated or reduced, but still have a significant residual adverse effect. Under these circumstances and the proposed amended policy wording, there would be no need to implement an offset measure because the adverse effect has been mitigated.</li> <li>Whether or not an offset measure is implemented should be at the discretion of the person making the point source discharge and be part of the best practicable option to manage the adverse effects of the discharge on the receiving environment. Consequently, the word "may" should be retained instead of "should".</li> <li>"Should" is weak and establishes no requirement to implement an offset measure.</li> <li>The purpose of an offset measure is to counteract the significant residual adverse effects of a primary discharge. Therefore, the primary discharge <u>will</u> have significant adverse effects. Because of this, it is inappropriate to replace "any significant toxic adverse effects" with "any significant <u>or</u> toxic effects".</li> <li>The RMA provides for payment of bonds, so such provision does not need to be included in a policy in the plan. Whether a bond is required in relation to a specific discharge is a matter that can be considered at the time the discharge is consented.</li> <li>Proposed subclause (e) would limit implementation of an offset measure to upstream of the primary discharge. This may not always be practicable. An offset measure may have to be undertaken elsewhere in the sub-catchment or Freshwater Management Unit, or in another Freshwater Management Unit upstream.</li> </ul>	I seek that the whole submission be disallowed.
Oil companies	73716	PO Box 33-817, Takapuna, Auckland 740. Attention: David le Marquand	Policy 11	PC1-2594	Oppose	<ul style="list-style-type: none"> <li>Allowing the submission could have the effect of allowing point source dischargers to avoid their obligations to help achieve the Vision and Strategy for the Waikato River.</li> <li>In fulfilling the aforementioned obligations, HCC requires the ability to justify an approach to water quality management based on adoption of the best practicable option.</li> <li>Section 75(3)(c) of the RMA requires HCC to give effect to the Vision and Strategy for the Waikato River. Objective 2.2.9 of the Hamilton City District Plan is: "The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities".</li> </ul>	I seek that the whole of the submission be disallowed
Oji Fibre Solutions (NZ) Ltd	73725	C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742	Policy 11	PC1-6547	Support in part	HCC supports the second part of the submission on the basis that a combination of mitigation measures may be the best practicable option.	I seek that the second part of the submission AMEND Policy 11 to make it clear that an offset is not additional to, but may form part of the Best Practicable Options be allowed.
Okell, Robert Steven	71079	1847 State Highway 30, RD 1, Guthrie, Rotorua 3077	Policy 11	PC1-155	Oppose	HCC supports the need for controls on all point source discharges but does not support this submission based on provisions in the plan requiring HCC to apply best practicable option to meet water quality targets.	I seek that "AMEND Policy 11 to increase the controls placed on point source discharges" be disallowed.
Osborne, Bob, Judy, Kim and Janette	73249	Te Toko Station, 2879 Hauturu Road, RD8, Te Kuiti 3988	Policy 11	PC1-9402	Oppose in part	HCC supports the regulation of all discharges, but opposes part of the submission that reads "DELETE Policy 11" on the basis point source discharges are consented and adverse effects are managed by consents and significant infrastructure necessary to support residents is associated. It is also not clear what a "significant" sub catchment" is and may be too restrictive.	I seek that the part of the submission seeking "DELETE Policy 11" be disallowed.
Save Lake Karapiro Inc	72459	110 Tower Road, RD 1, Matamata 3471. Attention: Angus Robson	Policy 11	PC1-5727	Oppose	HCC opposes this submission on the basis that pollution levies may not achieve the required outcomes for the Vision & Strategy.	I seek that the whole submission be disallowed.
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroi Rawiri	Policy 11	PC1-7884	Oppose	HCC prefers the alternative wording provided in HCC submission PC1-10758.	I seek that the whole submission to amend Policy 11 be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Policy 11	PC1-8264	Oppose in part	Offsets may be needed to help achieve the Vision and Strategy.	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>" REMOVE all reference to offsets from Policy 11, including the second sentence and clauses (b), (c) and (d)" .</li> </ul>
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Policy 11	PC1-3062	Oppose	<ul style="list-style-type: none"> <li>No proposed wording is included, so the submission is unclear and uncertain.</li> <li>Some drainage infrastructure does contribute to catchment loads. For example, gutters collecting stormwater runoff from a road surface, and the stormwater pipelines they discharge to, are drainage infrastructure, but they collect contaminants and are upstream of a point source discharge.</li> <li>The concern underlying the submission may be better addressed by ensuring that flood conveyance infrastructure is excluded, where appropriate, from the definition of "point source discharge".</li> </ul>	I seek that the whole submission point be disallowed.
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penter	Policy 11	PC1-11561	Oppose in part	HCC opposes the "requirement" for offsets, because they may not be necessary or the best practicable option.	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>"AMEND Policy 11 to explicitly require offsets".</li> </ul>
Ward, Bruce	73286	1290 Waipapa Road, RD7, Te Awamutu 3877	Policy 11	PC1-7388	Oppose in part	HCC opposes the deletion of the provision for offsets, because offsets may be the best practicable option to manage contaminants.	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>DELETE the use of offsets from PPC1.</li> </ul>

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Auckland/ Waikato Fish and Game and Eastern Region Fish and Game	74085	c/o Ben Wilson, 156 Brymer Road, RD 9, Hamilton 3289	Policy 12	PC1-10888	Oppose	<ul style="list-style-type: none"> <li>Policy 12 includes matters that need to be considered when considering an application for a resource consent for a point source discharge. These matters are additional to the matters set out in Policies 10, 11 and 13. Therefore it is appropriate for the policy to be labelled "Additional considerations for point source discharges ...".</li> <li>The submission claims "the matters to be taken into account do not include any consideration of output based standards for other point- and diffuse-discharges". This ignores the fact that Regional Council will consider any relevant provisions of a plan or a proposed plan when considering an application for a resource consent (s.104(1) of the RMA). This includes the objectives, the targets in Table 3.11-1, and the timeframes in Table 3.11-2. It is not necessary to reference the tables in the Policy.</li> <li>The implications for HCC and other stakeholders of the sub-catchment nitrogen leaching reductions in Schedule E (which is proposed within the submission) have not been assessed.</li> </ul>	I seek that the whole of the submission be disallowed.
Oil companies	73716	PO Box 33-817, Takapuna, Auckland 740. Attention: David le Marquand	Policy 12	PC1-2596	Oppose	Seeks that Policy only apply to pastoral land when it comes to consideration for point source discharges in relation to water quality targets. HCC opposes this submission based on the need to have regard given to proportion of loading, its past technology updates already undertaken, staging to spread costs, and opportunity costs.	I seek that the whole of the submission be disallowed.
Oji Fibre Solutions (NZ) Ltd	73725	C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742	Policy 12	PC1-6551	Oppose	HCC opposes the deletion of Policy 12, based on the need to have regard given to previous investments to manage loading through technology updates, the staging required to spread costs and the risk of large investment for a very small gain. The rest of the submission is unclear.	I seek that the whole of the submission be disallowed.
Okell, Robert Steven	71079	1847 State Highway 30, RD 1, Guthrie, Rotorua 3077	Policy 12	PC1-133	Oppose	HCC considers that the controls placed on point source discharges that require best practicable option and provision for offset will provide sufficient direction for consent application evaluation. It is not possible at this time to state in the Plan the explicit controls required in each case.	I seek that the whole submission, "AMEND Policy 12 to increase the controls placed on point source discharges", be disallowed.
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroai Rawiri	Policy 12	PC1-7931	Support in part	<ul style="list-style-type: none"> <li>The proposed amendments will improve the clarity and certainty of the plan.</li> <li>It is more appropriate to assess the effects of a point source discharge on the receiving environment, the local sub-catchment, rather than on the catchment as a whole.</li> </ul>	I seek that the following be allowed: AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <del>likely</del> achievement of the...
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroai Rawiri	Policy 12	PC1-7931	Oppose in part	The situation may be reached where, because of the effectiveness of existing treatment processes, making a further incremental improvement in the water quality of a point source discharge may be so expensive the relevant community or industry may not be able to afford it. In this case, that proposed upgrade is unlikely to be the best practicable option. Instead, one or more offset measures could be the best practicable option for achieving the required river water quality improvements.	I seek that the following part of the submission be disallowed: DELETE Policy 12d.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Policy 12	PC1-7931	Oppose	Past effort expended to understand and reduce contaminant discharges should be taken into account where applicable, when applications are made for point source discharges.	I seek that "AMEND Policy 12(a) to provide for shorter timeframes sought by the submission, AND DELETE Policy 12(b) or clarify that this only applies to existing regionally significant infrastructure." be disallowed
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Policy 12	PC1-3066	Oppose in part	HCC supports consideration of the part flood drainage infrastructure plays in managing water, but the intent and effects of the submission point are not clear. Some drainage infrastructure does contribute to catchment loads. For example, gutters collecting stormwater runoff from a road surface, and the stormwater pipelines they discharge to, are drainage infrastructure, but they collect contaminants and are upstream of a point source discharge.	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>AMEND Policy 12 to read: "<u>e. That flood and drainage infrastructure is not contributing to catchment loads but conveying water for flood management purposes.</u>"</li> </ul>
Waikato River Authority	74033		Policy 12	PC1-11562	Oppose	<ul style="list-style-type: none"> <li>Despite the application of the Best Practicable Option to manage a contaminant discharge, urban development that is necessary to give effect to the Waikato Regional Policy Statement, for example, may result in a net increase in one or more of the four target contaminants at any particular discharge point.</li> <li>Policy 11 provides for implementing offset measures elsewhere to counter any increased contaminant load.</li> <li>HCC's original submission (PC1-10758) seeks amendments to Policy 11 that would ensure, when offset measures are used, a net improvement in water quality in a specified sub-catchment or Freshwater Management Unit that exceeds the residual adverse effects of allowing a contaminant discharge.</li> <li>The relief sought by the submitter could have the effect of preventing urban development and land use activities that are necessary to give effect to the Waikato Regional Policy Statement.</li> </ul>	I seek that the whole submission be disallowed.

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Auckland/ Waikato Fish and Game and Eastern Region Fish and Game	74085	c/o Ben Wilson, 156 Brymer Road, RD 9, Hamilton 3289	Policy 13	PC1-10900	Oppose in part	<ul style="list-style-type: none"> <li>HCC opposes deletion of Policy 13. Provided the discharge water quality standards are predicted to be met for the duration of the consent, it would be appropriate to provide a consent term of 25 years or more for discharges from activities associated with significant capital investment. For example, a significant upgrade of a municipal or industrial wastewater treatment plant could cost in the order of tens or hundreds of millions of dollars. A longer consent term would provide certainty for the municipal authority or industry making the investment and improve the prospect of achieving a return on that investment.</li> <li>It is not possible to predict with confidence the nature and timing of technological improvements that might occur in the future. Consequently, it is difficult to see how consideration of something that may or may not happen could be factored into a decision about a consent term. Decisions on consent terms should be based on the technology proposed in the consent application. Therefore the amendment to Policy 13 (a) should be disallowed.</li> <li>"The sensitivity of the receiving environment" and "Past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term and their success" may be irrelevant to the determination of an appropriate consent term for future activity, which may involve a different contaminant load. More relevant to that determination would be the predicted contaminant load during the consent term, the treatment capacity of the proposed treatment process vis-a-vis the predicted load, and the likelihood that the discharge from the proposed treatment process will achieve the water quality targets in the receiving environment.</li> <li>It is not clear what a "substantial contaminant reduction measure" is.</li> </ul>	<p>I seek that the following parts of the submission be disallowed:</p> <ul style="list-style-type: none"> <li>DELETE Policy 13</li> <li>OR AMEND to read:  <b>"Point source consent duration</b>  When determining an appropriate duration for any point source consent granted consider the following matters:  a. <u>Alternative methods of discharge, technology improvements or other changed circumstances that may arise in the future; A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met;</u> and  aa. <u>The sensitivity of the receiving environment and the adequacy/certainty of information that is available; and</u>  ab. <u>The applicant's past record of responsiveness to adverse effects including past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term and their success; and</u>  b. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality;  c. The need to provide appropriate certainty of investment where <u>substantial</u> contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</li> </ul>
McKenzie, Colin and Valerie	71225	1199 Churchill Road, RD 1, Tuakau 2696	Policy 13	PC1-1585	Oppose	HCC is unclear what is intended by this submission.	HC seeks that the whole submission be disallowed.
Oil companies	73716	PO Box 33-817, Takapuna, Auckland 740. Attention: David le Marquand	Policy 13	PC-2595	Oppose	HCC opposes this on the basis that there must be policy for point source discharges in order to provide direction to achieving the Vision & Strategy.	I seek that the whole submission be disallowed.
Oji Fibre Solutions (NZ) Ltd	73725	C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742	Policy 13	PC1-6561	Oppose	HCC opposes the removal of the provision that allows a longer consent term if criteria are met based on the need for robust planning, staging, funding and investment in a solution.	I seek that the whole submission, "REMOVE Policy 13 (a)", be disallowed.
Okell, Robert Steven	71079	1847 State Highway 30, RD 1, Guthrie, Rotorua 3077	Policy 13	PC1-765	Oppose	HCC considers that Policy 10 and 11 (subject to HCC submission points) provide appropriate policy to achieve the Vision & Strategy.	I seek that the whole submission, "AMEND Policy 13 to increase the controls placed on point source discharges", be disallowed.
Osborne, Bob, Judy, Kim and Janette	73249	Te Toko Station, 2879 Hauturu Road, RD8, Te Kuiti 3988	Policy 13	PC1-9419	Oppose	<ul style="list-style-type: none"> <li>HCC seeks the use of advanced technology and best practice management, but consent terms should not be shortened unnecessarily. Wastewater treatment plants, for example, are designed to service a future predicted population and to produce a specified quality of effluent. Treatment plant upgrades are expensive, costing tens or hundreds of millions of dollars. It is not practical or economic to redesign three waters infrastructure every time there is an improvement in technology. Assets need to be allowed to serve their design lives.</li> <li>There are provisions within consents to review conditions.</li> <li>Having common expiry dates would place a significant consent renewal burden on the Regional Council.</li> </ul>	I seek that "AMEND Policy 13 to ensure resource consent duration is reduced to allow advances in technology to be incorporated when they become available AND AMEND to ensure consents fit the timeframe of the next stage of short term water quality goals" be disallowed.
Tully, Ciaran	71653	1086B State Highway 27, Kaihere, Ngatea 3597	Policy 13	PC1-9663	Oppose	<ul style="list-style-type: none"> <li>Typically, point source discharge consents include provisions for monitoring, reporting and reviewing the consented discharges. Consequently, the amendments sought to PPC1 to require review of point source discharges are unnecessary and would add nothing to the Plan.</li> <li>The meaning of the part of the submission seeking disclosure of all point source discharges and costs of mitigations is unclear.</li> </ul>	I seek that whole submission be disallowed.
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Policy 13	PC1-3095	Support in part	HCC agrees the criterion set out in the policy should be whether the stated approaches have been satisfied, not whether the applicant has demonstrated this.	<p>I seek that the following parts of the submission be allowed:</p> <ul style="list-style-type: none"> <li>AMEND Policy 13(a) to read: "A consent term exceeding 25 years, where <del>the applicant demonstrates</del> the approaches set out in Policies 11 and 12 will be met; and..."</li> </ul>
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Policy 13	PC1-3095	Oppose in part	<p>In HCC's view, consideration of matters listed in Policy 12 are relevant to determining whether a consent with a term longer than 25 years should be issued. These matters include, for example:</p> <ul style="list-style-type: none"> <li>The significance of the discharge in terms of its contribution to the contaminant load: a minor contributor to the load could be a candidate for a longer consent term.</li> <li>It may be possible to stage implementation of additional mitigation measures in the future to manage increasing load from urban growth, for example, and still meet water quality targets.</li> <li>If a wastewater treatment plant, for example, were already achieving a high level of contaminant reduction through the application of best practicable option, and making any further contaminant reduction would be unsustainably expensive, then those circumstances could be factored into considering an appropriate term for the plant's discharge consent.</li> <li>HCC's original submission PC1-10843 seeks addition to Policy 12 of two further considerations, namely, seasonal climatic conditions and natural processes within waterbodies that affect the waterway's capacity to assimilate contaminants. These additional considerations could inform decisions about the appropriate consent term for a contaminant discharge consent.</li> </ul>	<p>I seek that the following part of the submission be disallowed:</p> <ul style="list-style-type: none"> <li>AMEND Policy 13(a) to read: "... the approaches set out in <del>Policies</del> <u>Policy 11 and 12</u> will be met; and..."</li> </ul>

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
Watercare Services Ltd	74077	Private Bag 92 521, Wellesley Street, Auckland 1141. Attention: Mark Bourne	Policy 13	PC1-8337	Oppose	HCC supports the general intent of the submission, but the submission doesn't set out amended wording. Consequently, HCC is unable to assess the implications of the amendments.	I seek that the whole submission be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Policy 14	PC1-10742	Support in part	HCC supports an immediate start being made on the restoration of lakes in Hamilton City and Lake Rotokauri (which lies outside the City but receives drainage from it) using existing information, especially where there is a risk of water quality declining to a point where the lake's life-supporting capacity is compromised.	I seek that the part of the submission that would require the restoration of the three natural lakes in Hamilton City (Lakes Rotoroa, Rotokaeo and Waiwhakareke) and Lake Rotokauri being implemented using existing data and information from work already completed to avoid further delay in improving lake water quality be allowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Policy 14	PC1-8335	Oppose	The Collaborative Stakeholder Group, when developing PPC1, settled on the objective of achieving the long term water quality targets by 2096. This was considered a reasonable and realistic timeframe to effect the landuse changes that are necessary, while sustaining the ability of people and communities to provide for their social, economic and cultural wellbeing. Requiring these targets to be achieved in a shorter timeframe will put additional financial and social stress on people and communities, which may be unsustainable.	I seek that the whole submission to change the timeframe for restoring and protecting lakes from 2096 to 2050 be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Policy 17	PC1-10746	Oppose	<ul style="list-style-type: none"> <li>The implications to HCC of unspecified amendments to the policy are unclear and uncertain.</li> <li>If the words "secondary benefits" were to be deleted, they would need to be replaced by alternative words, or the policy further amended to accommodate the deletion. As alternative wording is not included in the submission, the effect of the submission point is unclear and uncertain.</li> </ul>	I seek that the whole submission be disallowed.
Oji Fibre Solutions (NZ) Ltd	73725	C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742	Policy 17	PC1-6562	Oppose	HCC opposes this on the basis that both diffuse and point source discharges contribute to degraded water quality in receiving environments and that it is necessary for all dischargers to manage their discharges.	I seek that the whole submission be disallowed.
Waikato Federated Farmers Meat & Fibre Industry Group	73934	c/- PO Box 447, Hamilton 3240. Attention: Chris Irons	Policy 17	PC1-2707	Oppose	Both diffuse and point source discharges contribute to degraded water quality in receiving environments, and it is necessary for all dischargers to contribute to the protection and enhancement of the health and well-being of the Waikato River.	I seek that the whole of the submission be disallowed.
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroi Rawiri	Policy 17	PC1-7985	Support	<ul style="list-style-type: none"> <li>S.17 of the Waikato -Tainui Raupatu Claims (Waikato River) Settlement Act 2010 requires anyone carrying out functions or exercising powers under the RMA to have particular regard to the Vision and Strategy for the Waikato River.</li> <li>The Vision and Strategy for the Waikato River has many different components and actions. In the process of managing contaminant discharges, it may be possible to simultaneously advance other matters in the Vision and Strategy as well. It would be sensible to do so, to achieve synergies and to comply with the Waikato -Tainui Raupatu Claims (Waikato River) Settlement Act 2010.</li> <li>Section 75(3)(c) of the RMA requires HCC is to give effect to the Vision and Strategy for the Waikato River. Objective 2.2.9 of the Hamilton City District Plan is: "The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities".</li> </ul>	I seek that the whole submission be allowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	3.11.4 Implementation Methods	PC1-10633	Oppose	The submission point seeks new methods, but offers no proposed wording. Consequently, it lacks clarity and certainty.	I seek that the whole submission be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	3.11.4.1	PC1-10750	Support	Collaborative effort will be needed to achieve PPC1's objectives.	I seek that the whole of the submission be allowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	3.11.4.5	PC1-10759	Support in part	The type of amendment sought will improve the clarity and certainty of PPC1.	I seek that the following part of the submission be allowed: "that the method be retained with amendments that provide greater clarity for plan users around when a sub-catchment plan will be required."
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	3.11.4.5	PC1-10759	Oppose in part	A method requiring prioritisation of mitigation measures with the greatest environmental outcomes and requiring high cost options could be in conflict with Policy 11, which requires adoption of the Best Practicable Option to manage the adverse effects of contaminants.	I seek that the following part of the submission be disallowed: "that mitigation measures with the greatest environmental benefits be prioritised recognising that this could require high cost options to achieve desired outcomes."
Rotorua Lakes Council	73373	1061 Haupapa Street, Rotorua 3046. Attention: Chris Dillon	3.11.4.5	PC1-2514	Support in part	<ul style="list-style-type: none"> <li>Sub-catchment plans will be an effective way to help achieve the Vision and Strategy for the Waikato River.</li> <li>Territorial authorities will hold relevant information that will support plan development and will also own and manage much of the infrastructure within each sub-catchment.</li> <li>HCC does not understand the third amendment sought.</li> </ul>	I seek that the following parts of the submission be allowed: "AMEND Method 3.11.4.5 to include: <ul style="list-style-type: none"> <li>"<a href="#">Making development of sub-catchment plans a high priority implementation item</a>" and</li> <li>"<a href="#">Working closely with territorial authorities in development of sub-catchment plans</a>".</li> </ul>
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	3.11.4.5	PC1-3106	Support in part	The amendment will improve clarity and certainty.	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>Amend as follows: "3.11.4.5 (f) <a href="#">Coordinate funding of mitigation work by those contributing to water quality degradation, in proportion to that contribution</a> <a href="#">Develop funding models for sub catchment planning processes and mitigation action where an individuals contribution to funding is proportional to their contribution to sub-catchment contaminant discharges</a>".</li> </ul>

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
Waitomo District Council	73688	PO Box 404, Queen Street, Te Kuiti 3941. Attention: Cathy O'Callaghan	3.11.4.6 Funding and implementation P	PC1-10324	Support	<ul style="list-style-type: none"> <li>A lot of work will be needed to implement PPC1; it will be essential for this work to be adequately resourced.</li> <li>It is appropriate to consider what PPC1 information, if any, should be included on LIM reports.</li> <li>HCC wishes to be involved in the prioritisation, development and implementation of sub-catchment plans. An advantage of WRC and territorial authorities working together is a wider range of funding sources for implementing measures identified in sub-catchment plans.</li> </ul>	I seek that the whole of the following submission be allowed: <ul style="list-style-type: none"> <li>ADD the following to Method 3.11.4.6: "(c). Provide sufficient staff and financial resources to work with territorial authorities within the catchments to ensure consistent and coordinated information and implementation is available to landowners and community engagement is undertaken to ensure the purposes are well understood by the community (d). Investigate methods of providing PPC1 information on LIM reports. (e) Work with local authorities and stakeholders within the catchments to prioritise, develop and implement sub-catchment plans."</li> </ul>
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	3.11.4.7	PC1-10240	Support	<ul style="list-style-type: none"> <li>The proposed amendment clarifies Waikato Regional Council will lead the research and it will be done in partnership with other agencies and industries.</li> <li>Research of the matters specified in b iv is considered desirable as it could inform the selection of Best Practicable Option and offset measures.</li> </ul>	I seek that the whole of the submission be allowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	3.11.4.8	PC1-10241	Support	<ul style="list-style-type: none"> <li>The proposed amendments will broaden the scope of the options considered for the next Regional Plan Review.</li> </ul>	I seek that the whole of the submission be allowed.
Te Whakakitenga o Waikato Inc	74105	PO Box 848, Hamilton 3240. Attention: Taroi Rawiri	3.11.4.9	PC1-8055	Support	The proposed amendments will improve the plan's clarity and certainty.	I seek that the whole submission be allowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	3.11.4.10	PC1-10242	Support	<ul style="list-style-type: none"> <li>Deleting d and shifting it to Method 11 will focus Method 10 on monitoring and reporting water quality and Method 11 on monitoring the contaminant reduction effectiveness of land use changes.</li> </ul>	I seek that the whole of the submission be allowed.
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	3.11.4.11	PC1-10243	Support	<ul style="list-style-type: none"> <li>The amendments will improve understanding of contaminant sources and the contaminant reduction effectiveness of various land use changes. This will be useful information for future plan changes.</li> </ul>	I seek that the whole of the submission be allowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	3.11.4.12	PC1-11053	Support	The method will help achieve PPC1's objectives.	I seek that the whole of the submission be allowed.
Fulton Hogan Limited	74048	C/- Boffa Miskell Limited, PO Box 91-250, Auckland 1142. Attention: Sharon Dines.	3.11.6 List of Tables and Maps	PC1-10882	Support in part	<ul style="list-style-type: none"> <li>The amendments will improve PPC1's clarity and certainty.</li> <li>Actions will need to be taken over the 80 year period, not just in the 80th year.</li> <li>"Water quality states" is a more appropriate term than "values" in this context and avoids any potential confusion with the "values" described in section 3.11.1 of PPC1.</li> </ul>	I seek that the following parts of the submission be allowed: <ul style="list-style-type: none"> <li>AMEND Chapter 3.11.6, Explanatory note to Table 3.11-1, [first paragraph,] to read: "The tables set out the concentrations (all attributes except clarity) or visibility distance (clarity attribute) to be achieved by actions taken in the short term and <del>at</del> over 80 years for rivers and tributaries, and at 80 years for lakes FMUs"; and</li> <li>AMEND Chapter 3.11.6, Explanatory note to Table 3.11-1 ([first paragraph,] last sentence), to read: "Where water quality needs to improve, the <u>water quality states</u> <del>values</del> to be achieved at a..."</li> </ul>
Fulton Hogan Limited	74048	C/- Boffa Miskell Limited, PO Box 91-250, Auckland 1142. Attention: Sharon Dines.	3.11.6 List of Tables and Maps	PC1-10882	Oppose in part	<ul style="list-style-type: none"> <li>The submission seeks to delete reference to "targets" and, in some instances, replace the term with "desired ... states", "desired water quality state(s)", or "state".</li> <li>If the 80-year water quality attribute states listed in Table 3.11-1 were not regarded as "targets", then their significance would be diminished, and PCC1 would be weakened. If focus on achieving those states were lost, then even greater effort could be required in the future to achieve them. This would have more significant adverse economic and social effects than if they were identified as targets at the outset and kept in the regional community's sights.</li> <li>Section 75(3)(c) of the RMA requires HCC is to give effect to the Vision and Strategy for the Waikato River. Objective 2.2.9 of the Hamilton City District Plan is: "The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities".</li> <li>The reasons for the exception (that is, for allowing part of the submission) are explained in a separate further submission above.</li> </ul>	I seek that the whole submission be disallowed, except the following parts: <ul style="list-style-type: none"> <li>AMEND Chapter 3.11.6, Explanatory note to Table 3.11-1, [first paragraph,] to read: "The tables set out the concentrations (all attributes except clarity) or visibility distance (clarity attribute) to be achieved by actions taken in the short term and <del>at</del> over 80 years for rivers and tributaries, and at 80 years for lakes FMUs"; and</li> <li>AMEND Chapter 3.11.6, Explanatory note to Table 3.11-1 ([first paragraph,] last sentence), to read: "Where water quality needs to improve, the <u>water quality states</u> <del>values</del> to be achieved at a..."</li> </ul>
DairyNZ	74050	Private Bag 3221, Hamilton 3240 Attention: Justine Young	Table 3.11-1	PC1-10188	Support	The submission will improve the clarity and certainty of PPC1.	I seek that the whole of the submission be allowed.
Population Health	73996	Waikato District Health Board, Private Bag 3200, Hamilton 3400. Attention: Richard Wall	Table 3.11-1 Water Quality Targets	PC1-4863	Oppose	<ul style="list-style-type: none"> <li>A 95th percentile value of 540 E. coli/100mL is the minimal acceptable state for activities likely to involve full immersion (NPS-FM, 2014, p.31). At this level there is an estimated risk of one case of campylobacter infection in every 20 exposures (<i>Microbiological Water Quality Guidelines for Marine and Freshwater Recreational Areas</i> (Ministry for the Environment, 2003, p.H26).</li> <li>In the medium to long term, HCC expects a moderate likelihood for adverse effect on ability to achieve the 95th percentile target for stormwater discharges ( 540 E. coli/100mL). Some expenditure by HCC on mitigation measures may be required.</li> <li>The implications of reducing this target to 260 E. coli/100mL have not been assessed, but, clearly, achieving this lower target would be more challenging.</li> </ul>	I seek that the whole submission be disallowed.
Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)	74105	PO Box 848, Hamilton 3240. Attention: Taroi Rawiri	Table 3.11-1	PC1-7491	Support in part	<ul style="list-style-type: none"> <li>HCC anticipates it will be a challenge to achieve the downstream water quality target for E.coli. Significant at-source reduction, treatment interventions, alternative discharge and disposal approaches, or large scale off-setting of the effects of discharges will be required. The problem will be associated with stormwater, not with the Wastewater Treatment Plant.</li> <li>HCC would prefer to retain the notified 80-year numerical targets for E.coli, than see more stringent targets adopted, which other submitters have sought.</li> </ul>	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>"RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and subcatchments".</li> </ul>

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
The Worsp Family Trust	73997	692 Matira Road, RD2, Ngaruawahia 3794	Table 3.11-1	PC1-5090	Oppose in part	<ul style="list-style-type: none"> <li>Table 3.11-1 does not need amending because of the contaminant contribution from city stormwater or any other source. Table 3.11-1 sets out short term and 80 year targets for the various attributes, and the targets are independent of the contaminants' sources; the same limits apply to urban areas as to farming and all other landuse activities.</li> <li>HCC has a Comprehensive Stormwater Discharge Consent from Waikato Regional Council, which sets out conditions for managing contaminants discharged from existing developed areas within the City.</li> <li>Since at least 2012, HCC has had a programme to develop Integrated Catchment Management Plans (ICMPs) for every catchment in the City. By end of 2017, two ICMPs had been completed and certified by Waikato Regional Council as meeting the requirements of the CSDC. These were for the Otamangenge and Rotokauri catchments. Work has begun on preparing ICMPs for Te Ara o Katapaki, Mangaheka, Mangakotukutuku, and Kirikiriroa catchments. HCC has provided \$9.3M dollars in its 10-year plan (2018-2027) to continue the development of ICMPs for the City.</li> </ul>	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>The part that seeks to amend PPC1 "to contain rules for the ... measurement of city storm water contribution".</li> </ul>
Waikato Environment Centre	73436	PO Box 19104, Hamilton 3244. Attention: Sonia Fursdon	Table 3.11-1	PC1-6231	Oppose in part	<ul style="list-style-type: none"> <li>HCC's Comprehensive Stormwater Discharge Consent conditions already has controls on dissolved oxygen, temperature, pH and toxic heavy metals.</li> <li>The implications of the additional attributes for HCC and other stakeholders have not been assessed.</li> <li>The additional attributes could possibly be considered for inclusion as part of a future plan change.</li> </ul>	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>The part that seeks to amend Table 3.11-1 to include the following additional attributes: "Te Hauora O te Taiao; natural character; dissolved oxygen (DO); deposited and suspended sediment; Freshwater Macroinvertebrate Health (Macroinvertebrate Community Index); periphyton; cyanobacteria; benthic cyanobacteria; Dissolved Inorganic Nitrogen (DIN) &amp; total nitrogen in the tributaries / sub catchments; total phosphorous in the tributaries / sub catchments; temperature; pH; toxic heavy metals; barriers to fish migrations, and; water flows and levels."</li> </ul>
Waikato River Authority	74033	PO Box 9338, Hamilton 3204. Attention: Bob Penter	Table 3.11-1	PC1-11559	Oppose in part	<ul style="list-style-type: none"> <li>The proposed directive, "shall not increase", is stronger and more restrictive than the "should not" set out in clause 1(3)(h) of the Vision and Strategy for the Waikato River.</li> <li>Despite the application of the Best Practicable Option to manage a contaminant discharge, it is possible that urban development that is necessary to give effect to the Waikato Regional Policy Statement, for example, may result in a net increase in one or more of the four target contaminants at any particular discharge point.</li> <li>However, Policy 11 provides for implementing offset measures elsewhere to counter the increased contaminant load.</li> <li>HCC's original submission (PC1-10758) seeks amendments to Policy 11 that would ensure, when offset measures are used, a net improvement in water quality in a specified sub-catchment or Freshwater Management Unit that exceeds the residual adverse effects of allowing a contaminant discharge.</li> <li>The relief sought by the submitter could have the effect of preventing development and land use activities that are necessary to give effect to the Waikato Regional Policy Statement.</li> </ul>	I seek that the part of the submission that would prohibit an increase in contaminant levels above existing levels be disallowed.
Waitomo District Council	73689	PO Box 404, Queen Street, Te Kuiti 3941. Attention: Cathy O'Callaghan	Table 3.11-1: Short term and long term numerical water quality targets	PC1-10848	Support in part	The amendments would improve the clarity of PPC1.	I seek that the following parts of the submission be allowed: <ul style="list-style-type: none"> <li>ADD the table number (3.11-1) in the title of the table on page 57</li> <li>AND ADD a map identifying the locations of the monitoring sites in Table 3.11-1</li> </ul>
Waitomo District Council	73689	PO Box 404, Queen Street, Te Kuiti 3941. Attention: Cathy O'Callaghan	Table 3.11-1: Short term and long term numerical water quality targets	PC1-10848	Oppose in part	<ul style="list-style-type: none"> <li>PPC1 aims for contaminant management measures to be implemented in the period to 2026 that would achieve 10% of the improvement in water quality values that is required to achieve the 2096 targets. However, existing concentrations of contaminants in groundwater will take time to appear in streams and waterways. Because of this, PPC1 recognises the full effect of the 10% improvement may not be observed until after 2026. Accordingly, it will be inappropriate to indicate in Table 3.11-1 that the short term targets were expected to be achieved by 2026.</li> </ul>	I seek that the following part of the submission be disallowed: <ul style="list-style-type: none"> <li>ADD a definition of "short term" in Table 3.11-1 as "by 2026"</li> </ul>
Watercare Services Ltd	74077	Private Bag 92 521, Wellesley Street, Auckland 1141. Attention: Mark Bourne	Table 3.11-1	PC1-8435	Support in part	HCC's original submission (PC1-10843) seeks amendments to Policy 12 to recognise the effects of seasonal climatic conditions, namely, the contaminant assimilative capacity of the water bodies changes with the seasons. The clarity and certainty of PPC1 would be improved if the seasonal limits were included in Table 3.11-1.	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>AMEND Table 3.11-1/PPC1 to recognise the seasonality effects of point source discharges as is current practice with many existing discharge consents to the Waikato River.</li> </ul>
Auckland/ Waikato Fish and Game and Eastern Region Fish and Game	74085	c/o Ben Wilson, 156 Brymer Road, RD 9, Hamilton 3289	Table 3.11-2	PC1-11005	Oppose in part	<ul style="list-style-type: none"> <li>The implications of the additional columns headed "Rule commencement date", "First review date" and "Review period thereafter" are unclear.</li> <li>The submission has deleted reference to the Kirikiriroa Stream sub-catchment.</li> </ul>	I seek that the parts of the submission relating to the Waikato River and its catchment within Hamilton City be disallowed.
Department of Conservation	71759	Director-General of Conservation, Private Bag 3072, Hamilton 3240. Attention: Gemma White and David Speirs	Table 3.11-2	PC1-11067	Support in part	<ul style="list-style-type: none"> <li>Identifying lakes as Priority 1 in Table 3.11-2 would result in action being taken earlier (in accordance with Policy 8 and Method 3.11.4.4) to improve their water quality.</li> <li>Lake Rotoroa is a very popular destination for Hamilton residents and visitors and is well used for boating - yachting, waka ama, dragon boating and model boat operation. Lake users would benefit from improved lake water quality.</li> <li>Having lake catchment management plans prepared early would enable them to inform the relevant Integrated Catchment Management Plans, which HCC will prepare for the larger sub-catchments within which the lake sub-catchments are located. HCC has a programme to prepare an ICMP for each catchment in the City.</li> <li>Listing the sub-catchments of Lakes Rotoroa, Rotokaeo, Waiwhakareke and Rotokauri in Table 3.11-2 would improve the clarity and certainty that the sub-catchments of these lakes will be prioritised for the management of land and water resources. Although Policy 8(b) states the Lakes Freshwater Management Units are priority areas, the first part of Policy 8 indicates that areas have to be set out in Table 3.11-2 for the management of land and water resources within those areas to be prioritised.</li> </ul>	I support the part of the submission that would require the sub-catchments of the three natural lakes in Hamilton City (Lakes Rotoroa, Rotokaeo and Waiwhakareke) and Lake Rotokauri (which lies outside the City but receives drainage from it) being included as Priority 1 in Table 3.11-2.

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Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Table 3.11-2	PC1-3646	Support in part	<ul style="list-style-type: none"> <li>The table is an integral part of PPC1. It lists all the sub-catchments and identifies their priorities, which are referenced in Policies 8 and 9, Rules 3.11.5.3, 3.11.5.4 and 3.11.5.5, and Schedule C.</li> </ul>	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>Retain Table 3.11-2.</li> </ul>
Mangakotukutuku Stream Care Group Incorporated	72412	PO Box 19104, Hamilton 3244. Attention: Grant Blackie	Map 3.11-2	PC1-4467	Support in part	Map 3.11-2 complements Table 3.11-2, which is an integral part of PPC1. The map shows the location of the each sub-catchment and whether it is priority 1,2 or 3. The priorities are referenced in Policies 8 and 9, Rules 3.11.5.3, 3.11.5.4 and 3.11.5.5, and Schedule C.	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>Retain Map 3.11-2.</li> </ul>
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Additions to Glossary of Terms	PC1-3666	Oppose	<ul style="list-style-type: none"> <li>HCC expects to use human-made wetlands extensively throughout Hamilton City to manage stormwater runoff and its potential adverse effects to help achieve the Vision and Strategy for the Waikato River.</li> <li>The submission seeks amendments to the definition of "wetland" which would not distinguish between natural wetlands and human-made wetlands.</li> <li>Consequently, plan provisions intended for natural wetland only would apply to human-made wetlands as well. Such provisions might severely inhibit the operation, maintenance, efficiency and effectiveness of the human-made wetlands and inhibit their ability to support achievement of the Vision and Strategy for the Waikato River.</li> </ul>	I seek that the whole of the submission be disallowed.
AFFCO New Zealand Limited	74140	c/- Argo Environmental Limited, PO Box 105 774, Auckland 1143. Attention: Garry Venus	Additions to Glossary of Terms	PC1-7620	Support in part	<ul style="list-style-type: none"> <li>A definition of "best practicable option" is necessary, because Policies 11 and 12 refer to it.</li> <li>Case law has established a good understanding of the meaning of "best practicable option" as defined in the RMA.</li> </ul>	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>Add the definition of best practicable option described in the Resource Management Act.</li> </ul>
AFFCO New Zealand Limited	74140	c/- Argo Environmental Limited, PO Box 105 774, Auckland 1143. Attention: Garry Venus	Additions to Glossary of Terms	PC1-7620	Support in part	<ul style="list-style-type: none"> <li>A definition of "regionally significant industry" is necessary, because Policies 10 refers to it.</li> </ul>	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>Add the following definition: "<i>Regionally significant industry</i>"- means industry based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes: <ol style="list-style-type: none"> <li>Dairy manufacturing sites;</li> <li>Meat processing plants and rendering plants;</li> <li>Wood processing plants; and</li> <li>Mineral extraction activities.</li> </ol> </li> </ul>
Taupo District Council	74207	Private Bag 2005, Taupo Mail Centre, Taupo 3352. Attention: David J Trewavas	Additions to Glossary of Terms	PC1-8172	Support in part	Allowing the submission will improve PPC1's clarity and certainty.	I seek that the following part of the submission be allowed: <ul style="list-style-type: none"> <li>The definition of regionally significant infrastructure includes stormwater infrastructure.</li> </ul>
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Definition - Diffuse discharge	PC1-8694	Support	<ul style="list-style-type: none"> <li>The term "diffuse discharge" is used extensively throughout PPC1.</li> <li>PPC1's clarity and certainty is enhanced by defining this term.</li> </ul>	I seek that the whole of the submission be allowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Definition - Escherichia coli (E. coli)	PC1-8700	Support	<ul style="list-style-type: none"> <li>The term "Escherichia coli (E. coli)" is used extensively throughout PPC1.</li> <li>PPC1's clarity and certainty is enhanced by defining this term.</li> </ul>	I seek that the whole of the submission be allowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Definition - Microbial pathogens	PC1-8709	Support	<ul style="list-style-type: none"> <li>The term "microbial pathogens" is used extensively throughout PPC1.</li> <li>PPC1's clarity and certainty is enhanced by defining this term.</li> </ul>	I seek that the whole of the submission be allowed.
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Definition - Best management practice	PC1-3665	Oppose	The submission seeks to amend the definition of "best management practice", but provides no suggested wording. Consequently, it lacks clarity and certainty.	I seek that the whole of the submission be disallowed.
Auckland/ Waikato Fish and Game and Eastern Region Fish and Game	74085	c/o Ben Wilson, 156 Brymer Road, RD 9, Hamilton 3289	Definition - Offset/s	PC1-11018	Oppose	<ul style="list-style-type: none"> <li>The submission seeks amendments that would change the focus or purpose of offset measures from managing contaminants to achieving "conservation outcomes".</li> <li>HCC's original submission on Policy 11 (PC1-10758) sets out a proposed purpose of any offset measure, which is based on ensuring a net improvement in water quality in the specified sub-catchment or Freshwater Management Unit that exceeds the residual adverse effects of allowing the primary discharge.</li> </ul>	I seek that the whole of the submission be disallowed.
Genesis Energy Ltd	74052	Private Bag 3131, Hamilton 3204. Attention: Nigel Goodhue	Definition - Offset/s	PC1-11303	Support	<ul style="list-style-type: none"> <li>The submission seeks to amend the definition as follows: "<i>Offset means for a specific contaminant/s an action that reduces some or all of the residual adverse effects of that contaminant on water quality</i>".</li> </ul> <p>The amendments the submission seeks would improve the clarity and certainty of the provision.</p>	I seek that the whole of the submission be allowed.
Gareth Kilgour	72950	62 State Highway 2, RD1, Pokeno 2471	Definition - Offset/s	PC1-1954	Support	<ul style="list-style-type: none"> <li>The submission seeks amendments to the definition "to acknowledge that compensation measures may result in environmental benefits in other areas (i.e. not necessarily for the same contaminant[])". This relief is consistent with part of the relief HCC sought regarding Policy 11 - see submission PC1-10758.</li> </ul>	I seek that the whole of the submission be allowed.

Name of Original Submitter	Original Submitter ID	Address of Original Submitter	Provision	Submission Point ID	Support / Oppose	The Reasons for My Support or Opposition are:	I seek that the whole (or part [Describe Part]) of the submission be allowed (or disallowed)
Oji Fibre Solutions (NZ) Ltd	73725	C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742	Definition - Offset/s	PC1-8946	Oppose	The submissions seeks amendments to the definition that do not improve the clarity or certainty of PPC1.	I seek that the whole of the submission be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Definition - Offset/s	PC1-8719	Oppose	<ul style="list-style-type: none"> <li>The submission seeks to delete the definition of "offset/s".</li> <li>HCC supports the retention in PPC1 of provision for offset measures and a definition of "offset/s".</li> </ul>	I seek that the whole of the submission be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Definition - Point source discharge	PC1-8719	Oppose	HCC prefers the definition of point source discharge provided in HCC submission PC1-11049.	I seek that the whole of this submission point be disallowed.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PO Box 2516, Christchurch 8140. Attention: Jen Miller	Definition - Point source discharge	PC1-8722	Oppose	HCC prefers the definition of point source discharge provided in HCC submission PC1-11049.	I seek that the submission to change the definition of "point source discharge" to "means a discharge from a specific and identifiable outlet onto or into land, a waterbody or the sea" be disallowed
Waikato Regional Council	72890	Private Bag 3038, Waikato Mail Centre, Hamilton 3240. Attention: Andrew Tester	Definition - Point source discharge	PC1-3680	Oppose	HCC agrees that the definition of "point source discharge" needs clarifying, but the submission includes no suggested wording, so is unclear.	I seek that the whole submission be disallowed.
Mercury NZ Limited	73182	PO Box 445, Hamilton 3240. Attention: Miles Rowe	Consequential amendments to Waikato Regional Plan - 3.2 Management of Water Resources	PC1-9692	Support	<ul style="list-style-type: none"> <li>The submission seeks retention of the notified consequential amendments to the Waikato Regional Plan under a new heading "Freshwater Management Units".</li> <li>The amendments improve the clarity and certainty of the plan.</li> </ul>	I seek that the whole submission be allowed.
Oji Fibre Solutions (NZ) Ltd	73725	C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742	Consequential amendments to Waikato Regional Plan - 3.3.3 Water Takes	PC1-8953	Oppose	<ul style="list-style-type: none"> <li>The submission seeks deletion of the notified consequential amendments to the Waikato Regional Plan.</li> <li>Changes in water quantity resulting from water takes affect the contaminant assimilative capacity of the residual water body. Accordingly, policies relating to water quality are relevant to water takes.</li> <li>The amendments the submission seek would not improve the clarity and certainty of the plan.</li> </ul>	I seek that the whole submission be disallowed.
Fonterra Co-operative Group Ltd	74057	PO Box 459, Hamilton 3204. Attention: Richard Allen	Consequential amendments to Waikato Regional Plan - 3.5 Discharges	PC1-13193	Support	The amendments the submission seeks would improve the clarity and certainty of the plan.	I seek that the whole submission be allowed.
Mercury NZ Limited	73182	PO Box 445, Hamilton 3240. Attention: Miles Rowe	Consequential amendments to Waikato Regional Plan - 5.1 Accelerated Erosion	PC1-9696	Support	<ul style="list-style-type: none"> <li>The submission seeks retention of the notified consequential amendments to the Waikato Regional Plan in same or similar form.</li> <li>The amendments improve the clarity and certainty of the plan.</li> </ul>	I seek that the whole submission be allowed.
Mercury NZ Limited	73182	PO Box 445, Hamilton 3240. Attention: Miles Rowe	Consequential amendments to Waikato Regional Plan - 5.2 Discharges onto or into land	PC1-9697	Support	<ul style="list-style-type: none"> <li>The amendments sought would improve the clarity and certainty of the plan.</li> <li>The reference within Policy 3.2.3 should be to the policies in section 3.11.3, not to the objectives in section 3.11.2.</li> </ul>	I seek that the whole submission be allowed.

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