

Postal Address
Private Bag 544, Ngaruawahia 3742
New Zealand

0800 492 452
www.waikatodistrict.govt.nz

By Email

17 September 2018

Waikato Regional Council
401 Grey Street
HAMILTON 3240

Attention: Vaughan Payne

Dear Vaughan

Re: Healthy Rivers/Wai Ora: Proposed Plan Change I and Variation I to Proposed Plan Change I – FURTHER SUBMISSIONS

Please find enclosed Further Submissions on the above proposed plan change.

Yours sincerely
on behalf of the Waikato District Council

Allan Sanson

Allan Sanson (WDC Mayor)

SUBMISSION FORM 6

CLAUSE 8 OF FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991 FURTHER SUBMISSION IN SUPPORT OF SUBMISSIONS ON PUBLICALLY NOTIFIED PROPOSED PLAN CHANGE I HEALTHY RIVERS/WAI ORA

To: Waikato Regional Council
401 Grey Street
HAMILTON 3240

Submission on: Further Submission on Proposed Plan Change I Healthy Rivers/Wai Ora

Name: Waikato District Council

Address: 15 Galileo Street
NGARUAWAHIA 3720

Contact Person: Stephen Howard, Waikato District Council
Phone: 07 824 8633 (Stephen.Howard@waidc.govt.nz)

1. The direction of PCI was supported by WDC in its submission, where the following broadly presents the submissions two major themes:
 - (a) *Primarily:* WDC seeks that PC outcomes (healthy waterways) are achieved through methods that ensure farmers, rural communities, businesses as well as towns, retain significant ability to provide for their social and economic wellbeing's, and:
 - (b) *Secondly:* WDC, as a wastewater service provider that hold point source consents, retains significant ability to continue this service in a practical way. This requires allowance for growth of communities in a financially manageable manner for present and future rate payers.

WDC's submission addressed aspects of PCI, where it was considered that relief sought would benefit the plan change process. The aspects targeted where (a) the proposed grandfathering of nitrogen rights (b) the proposed land use change rules (c) the extent of proposed fencing rules (d) the specifics of commercial vegetable requirements.

2. Many other submissions made on PCI share similar themes, where relief sought by submitters is for assurance that enhanced social and economic outcomes occur. There was particular alignment with outcomes sought by Territorial Authorities (TA's) in the region, providing the motivation for the formation of the Waikato Region Territorial Authorities Group (WARTA).

This group is made up of 10 TA's. Although a spectrum of relief exists within the individual TA's submissions, there is a consistency for the need of PCI to avoid limiting the ability of significant social and economic wellbeing's within the Waikato, as a result of PCI. The forming

of WARTA signifies a consistent 'stronger TA voice', and a joint WARTA further submission is to be received by WRC. The WDC submission and WARTA submission are intended to be fully aligned.

3. WDC makes the following further submission pursuant to clause 8 of the First Schedule RMA. Submission points are found in table format attached. WDC wishes to be heard in support of its submission and further submission, and will not gain any trade advantage as a result of these.

Allan Sanson

Signature:

Mayor Allan Sanson
(on behalf of Waikato District Council)

Date:

17th day of September 2018

Address for Service

Waikato District Council
15 Galileo Street
NGARUAWAHIA 3720

Attention: Stephen Howard

Submitter (ID)	Decision Requested	WDC's Position	Further Submission
Federated Farmers of NZ (74191)	A spectrum of relief sought within the submission	In principle support to the detailed submission	<p>It is considered that the general thrust of the submission is aligned with the WDCs submission given that:</p> <ul style="list-style-type: none"> • Fed Farmers have an overall support of the intention of PC I (restore and protect river water quality), where; • amendments are sought in relief that better facilitate the flexibility for farming activities, with the intention of better balancing social and economic outcomes of the PC. <p>The Fed Farmers submission approach, and relief sought, includes the development and introduction of an alternative set of provisions based on a 'most practical action' (MPA) concept. WDC is able to provide 'in principle' support to the submission given that <i>overall improved social and economic outcomes are sought</i>.</p>
Horticulture NZ (73801)	A spectrum of relief sought within the submission	In principle support to the detailed submission	<p>The WDC submission highlighted the uncertainty and challenges that commercial vegetable growers in particular may face in the context of PCI.</p> <p>The Horticulture NZ submission introduces new provisions that could advance an agreed set of provisions catering for growers alongside environmental protection.</p> <p>In principle support for proposed provisions can therefore be provided by WDC, given the <i>consistent outcome</i> sought by the relief of both submitters.</p>
Waikato & Waipa River Iwi (74035)	Submission points 1-51, including proposed Obj 2 amendments	In principle support	<p>WDC supports amendments sought to proposed Obj 2. The submission points aligns with the WDC theme that the PC outcomes are to ensure include social and economic wellbeing's are provided for in a meaningful manner. The inclusion of proposed wording in Obj2 of the submission that includes emphasises on future '<i>prosperity</i>' is considered to enhance the proposed provision, and is supported.</p>

Submitter (ID)	Decision Requested	WDC's Position	Further Submission
<p>WARTA TA's (74031, 73536, 73419, 74051, 67704, 72892, 73688, 74055, 74207)</p>	<p>A spectrum of relief sought within submissions</p>	<p>Support in entirety to the detailed submissions</p>	<p>An over-riding general theme of all TA submissions was support for the intention of the plan change, subject to amendments through relief that <i>introduces greater flexibility, and therefore fewer adverse social and economic consequences.</i></p> <p>WARTA formation has occurred to present a united voice of concern that sub-optimal PC outcomes may arise with proposed plan provisions. WDC can therefore support all of the partner Council submissions and the range of relief sought, given that ultimate outcomes these seek are aligned with the WDC submission.</p>
<p>Watercare (74077)</p>	<p>Submission points including amendments to Policy 10-13</p>	<p>In principle support</p>	<p>Watercare have expressed support in the intention of policies that are related to point source discharges, where additional relief is sought to better ensure that flexibility and options are provided for at the time of consenting. This includes amendments providing greater clarity to proposed provisions.</p> <p>Overall, the Watercare and WDC submissions are consistent in the requirement that <i>'PCI provisions ensure that the environmental benefit through point source mitigation, occurs at an acceptable financial cost to the communities served'</i>.</p> <p>Support can therefore be offered to the Watercare relief sought.</p>