

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

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 _____ 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.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1

NAME OF ORIGINAL SUBMITTER: _____ **ORIGINAL SUBMITTER ID:** _____

ADDRESS OF ORIGINAL SUBMITTER: _____

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.

PROVISION (e.g. Objective 4 or Rule 3.11.5.1): _____

SUBMISSION POINT ID (e.g. PC1-1234 or V1PC1-1234) _____

Do you support or oppose the submission? Support Oppose

THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:

Tell us why you support or oppose this submission. These reasons will help us to understand your further submission

I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED): *Give precise details*

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NOTES ON MAKING A FURTHER SUBMISSION

1. Serving a copy of your further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on (i.e. received by) Waikato Regional Council.

2. Further submission content review

Please note that your further submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

3. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available on Council's website. Under the RMA, any further submission supporting or opposing an original submission is required to be served on the original submitter after it is served on council therefore your contact details must be made available.

Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by the Waikato Regional Council with submitters having the right to access and correct personal information.

Contact us for more information

Phone: 0800 800 401

Email: healthyrivers@waikatoregion.govt.nz



Chief Executive
Waikato Regional Council
401 Grey St
Hamilton East
Hamilton

TO: Waikato Regional Council

Further SUBMISSION ON: Further Submissions on Proposed Plan Change 1 (and Variation 1) to the Waikato Regional Plan

FROM: Watercare Services Limited ("**Watercare**")

ADDRESS FOR SERVICE: The address for service specified below

DATE: 17 September 2018

Watercare could not gain an advantage in trade competition through this submission.

1. Introduction

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council.

Watercare is a company registered under the Companies Act 1993. Watercare provides integrated water and wastewater services to approximately 1.4 million people in Auckland. Watercare collects, treats and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. A total of 330 million litres of water is treated each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations to 450,000 households, hospitals, schools, commercial and industrial properties. Watercare's water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

As a council-controlled organisation ("**CCO**") under the Local Government Act 2002, and a substantive council-controlled organisation under the Local Government (**Auckland Council**) Amendment Act 2009 ("**Auckland Act**"), Watercare has certain obligations. For example, Watercare must achieve its shareholder's objectives as specified in the statement of intent, be a good employer and exhibit a sense of social and environmental responsibility.

As the CCO that provides water and/or wastewater services in Auckland, Watercare is also required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of the assets. Watercare must also not pay a dividend. Watercare must also give effect to relevant aspects of the Council's Long Term Plan, and act consistently with other plans of the Council.

As a substantive CCO, Watercare has a number of statutory accountability mechanisms, including the requirement to prepare and maintain a statement of intent, undergo performance monitoring, provide an

annual report, give effect to the Long Term Plan, and act consistently with other specified plans and strategies of the Council.

1.1 Watercare's Waikato Interests

Watercare has several interests in the Waikato Region, which includes:

- a) Watercare currently has an existing allocation to take 150,000 m³/day from the Waikato River, and is applying to take another 200,000 m³/day. Auckland's population is forecast to grow by another one million people over the next 30 years. This is a significant increase on the 1.4 million people currently connected to Watercare's water and wastewater networks.
- b) The Pukekohe Wastewater Treatment Plant will be subjected to significant population growth as identified in the Auckland Plan 2012. This growth is from approximately 27,500 in 2015 through to 82,200 in 2051.
- c) Watercare and the Waikato District Council are parties to a Bulk Supply Agreement for the provision of water and wastewater services to the growing townships of Pokeno and Tuakau within the Waikato District. These services include: the provision of bulk treated drinking water; transmission and treatment of bulk wastewater; and maintenance services for local network reticulation.
- d) Watercare's two largest water dams in the Hunua Ranges (the Mangatawhiri and Mangatangi dams) are located in the Waikato Region.

2. Submission

Watercare is pleased to have the opportunity to make a further submission to Proposed Plan Change 1 to the Waikato Regional Plan and Variation 1 of Proposed Plan Change 1 to the Waikato Regional Plan. These further submissions are included in the attached table.

Watercare wishes to be heard in support of its submission.

If others make a similar submission, Watercare will consider presenting a joint case with them.

Date: 17 September 2018



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Address for service:
Steve Webster
Chief Infrastructure Officer
Infrastructure Delivery Management
Watercare Services Ltd
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AUCKLAND 1141
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Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
Volume 1						
PC1-7043	Aldridge, Roderick Francis David	73788	General	<p>Amend so that point source discharge consents are reviewed in the first stage.</p> <p>Submission states: <i>“Delayed implementation. The changes need to take effect as soon as possible, but few actual changes are required in the first stage - PC 1. Instead most current activities and practises are able to continue for 10 years “grandfathered”. If it is legally possible the PC 1 should review point source discharge consents in the first stage. The most effective changes need to be made in the first stage before further degradation occurs. They will be much more difficult, disruptive and expensive later.”</i></p>	Oppose	To review all consents in the first stage will have practical implications in terms of time and resourcing.
PC1-10095	Alexander Farming Genetics	74115	General	<p>Delete PPC1 and consider revisiting PPC1 from a sub-catchment approach and any restrictions to be based on land class not land use.</p> <p>Undertake work into the effects of urban sprawl and population growth.</p> <p><i>“There should also be some work done into the effects of urban sprawl, population growth as the burden of the present strategy seems to fall on the shoulders of the rural ratepayer.”</i></p>	Oppose	Watercare seeks that PPC1 provides for population growth and associated infrastructure identified in the Waikato Regional Policy Statement and Auckland Unitary Plan.
PC1-9139	Auckland Council	73518	General	<p>AMEND PPC1 to provide for cross boundary approaches to ensure that wider catchment effects are considered.</p> <p>AND AMEND to provide for protection of intermittent streams within the Waikato region to ensure consistent NPS-FM policy and implementation approaches between Waikato and the southern</p>	Support	Watercare supports Auckland Council's submission seeking the protection of intermittent streams within the Waikato region to ensure consistent (where practical) NPS- FM policy and implementation approaches between Auckland and Waikato.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				boundary of the Auckland region.		
PC1-8458	Barry, Muiora	71615	General	AND ENSURE that all human sewage entering waterways is stopped.	Oppose	Watercare opposes this submission seeking all levels of human sewage entering waterways to be stopped as it is considered that this approach is inconsistent with the purpose of the RMA. The discharge of treated wastewater can be appropriately managed and provided for in PPC1.
PC1-13154	Beef + Lamb New Zealand Limited	73369	General	<p>No specific decision requested for PPC1, however the submission considers that the NPSFM has not been given effect to, in particular:</p> <ul style="list-style-type: none"> <input type="checkbox"/> There is a lack of clarity around what is considered to be a freshwater objective, limit or target and a failure to establish freshwater objectives and attributes. <input type="checkbox"/> The freshwater objectives established in PPC1 do not reflect values of freshwater including national values and do not recognise regional and local circumstances, as is required by Objective CA1, Policy CA2 or Policy CA3 of the NPSFM. <input type="checkbox"/> PPC1 provides for higher discharges to continue at their historic rate, even though this will not give effect to the NPSFM or the Vision and Strategy. <input type="checkbox"/> Table 3.11-1 is contrary to the NPSFM. <p>AND AMEND to give effect to the RMA and the NPSFM, and in particular ensure consistency with the objectives and policies under section C(a) National Objectives Framework.</p> <p>AND AMEND so that when formulating freshwater objectives and limits (including Table 3.11-1), the economic</p>	Support	Watercare supports this submission point as it aligns with Watercare's original submission. Watercare submitted that the provisions should be redrafted to assist with the overall workability of PPC1, remove ambiguities and avoid disputes over interpretation and improve clarity.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>wellbeing, including productive economic opportunities, are provided for within the context of environmental objectives, attributes and limits.</p> <p>The submitter also sought that methods, including rules, be put in place now to achieve the policies and objectives of the plan, give effect to the RMA and the NPSFWM. Management frameworks should be incorporated into PC1 now which provide for land use and discharge permits to be consented for up to 35 years as is provided for under section 123(d) RMA to provide applicants with certainty in order to make decisions for their families, and businesses, and where required to invest in environmental mitigation or reconfigure their systems.</p>		
PC1-13156	Beef + Lamb New Zealand Limited	73369	General	<p>AND AMEND to establish a nutrient transfer regime for nutrient user groups within sub-catchments, where catchment loads and limits have been established but only where any allocation methods are not based on current discharges (NRP) or land use. Transfer regimes are to enable nitrogen loss reductions to be achieved at least cost and to enable and encourage maximum efficiency and flexibility of resource use and to optimise economic benefits. Nutrient transfer systems must meet the following conditions:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The initial allocation system meets all of the allocation principles; <input type="checkbox"/> Only occurs within a sub-catchment or watershed and only within a nutrient user/Catchment Collective Groups; <input type="checkbox"/> The transferable portion of the 	Support	Watercare supports a nutrient transfer regime in principle but that this should be extended to include nitrogen and phosphorus.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				resource (e.g. nitrogen) only pertains to the load which achieves the desired environmental outcomes; and Result in improved economic outcomes and land use optimisation.		
PC1-6480	Bolt Trust, King Country Partnership 2013 LP and Lone Pine Trust	73539	General	<p>AMEND PPC1 to reduce town and industry discharges in the same time-frame as farming.</p> <p>Town and industry discharges must be treated as equal emitters/leachers to farming i.e. have no special rules and not just be allowed to continue as they currently do. Seeks relief:</p> <ul style="list-style-type: none"> - Reduce town and industry discharges in the same time frame as farming. - All citizens must be treated equally. - A blanket approach must not be used. 	Oppose	<p>Watercare's discharges are from regionally significant infrastructure assets that have significant benefits for the wellbeing of communities and provide ongoing water and wastewater services.</p> <p>The discharge of treated wastewater can be appropriately managed and provided for in PPC1 and the effects of individual point source dischargers can be reassessed as part of new discharge consent processes.</p>
PC1-8827	Carter, Graham Bruce	74082	General	<p>AMEND to require Council to lead the way by implementing the use of filter pumps for all storm water and wastewater outlets going into waterways, especially the Waikato river</p> <p>AMEND to require all current flows into the Waikato river to have filters applied and used to ensure that all water is treated and chemicals and organic matter removed prior to releasing into the waterways</p> <p>AMEND to ban all raw or untreated sewerage being released into waterways in the Waikato region</p> <p>AMEND to include monitoring of sewerage, wastewater and storm water outlets in the annual or bi-annual audits of every property or premises with an</p>	Oppose	Watercare opposes this submission point as it is unclear what is meant by filter pumps and how these can be implemented. Watercare's wastewater discharges can be managed and treated appropriately and discharged without the additional measures specified by the submitter.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				Environmental Plan		
PC1-4795	Finlayson, Wendy Janette	72825	General	<p>AMEND so that no treated or un-treated sewage is allowed to enter the Waikato River or its tributaries.</p> <p>The submitter opposes the plan as a whole, one reason being point source polluters such as sewage disposal points, with a re-write needed to state that no treated or un-treated sewage is allowed to enter the Waikato River or its tributaries.</p>	Oppose	Watercare opposes this submission seeking all levels of human sewage entering waterways to be stopped as it is considered that this approach is inconsistent with the purpose of the RMA. The discharge of treated wastewater can be appropriately managed and provided for in PPC1.
PC1-8933	Hancock Forest Management (NZ) Ltd	73724	General	<p>AMEND PPC1 by adopting a best practicable option approach through consent conditions OR plan rules, as an interim approach.</p> <p>AMEND to ensure that all diffuse sources eventually face discharge limits.</p> <p>AMEND to recognise that low capital cost options can be implemented sooner than high capital cost items.</p> <p>AMEND so that non-point source discharges are managed within the next ten years using a best practicable option approach as the foundation for regulation.</p>	Support	<p>Watercare also seeks the adoption of the best practicable option approach.</p> <p>Watercare and Hancock are in alignment in that the provisions do not achieve the purpose of the RMA, are inconsistent with the Regional Policy Statement and do not give effect to the NPS-FM. Further, the provisions do not represent the most appropriate way of meeting PPC1's objectives. Watercare supports these general points.</p>
PC1-8204	Hauraki District Council	73536	General	<p>AMEND to add measurable standards for point source discharges for new and renewed consents.</p> <p>The proposed Plan Change 1 provides for the contribution made to water quality by a point source discharge (wastewater systems) to be considered when considering a new or renewed resource consent. There is high level of uncertainty for point source discharges as decisions will be made against the objectives and policies - without there</p>	Oppose	Watercare supports the current approach within PPC1 of including point-source specific objectives and policies. On this basis, it is unnecessary to include rules for point source discharges.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				being any additional specific rules giving a direction to how the policy framework will be translated to consent conditions. We request that the Waikato Regional Council consider including measurable standards for point source discharges in its plan changes.		
PC1-8251	King Country Energy Limited	60693	General	AMEND to ensure there is proportionality in PPC1 between the size of an individual's contribution to the problem and the size of change required by them.	Support	Watercare is supportive of the concept of proportionality between the size of an individual's contribution to the problem and the size of the change required by them.
PC1-7495 PC1-7525 PC1-7532 PC1-7537 PC1-7561 PC1-7549 PC1-7555	Oceanview Farms Limited (Submitter 1-7)	74131 74132 74134 74135 74200 74201 74202	General	<p>AND AMEND PPC1 so resource consent terms are the same for urban and rural activities.</p> <p>AMEND PPC1 to require point and non-point discharges from urban land use to be addressed within the same regulatory framework and timeframes as rural activities.</p> <p>ENSURE urban intensification and greenfield development that degrades water quality in the Waikato catchment is avoided.</p> <p>Oppose the lack of a level playing field between rural and urban activities and their effects. It is not reasonable that current urban land use can continue to discharge high volumes and levels of contaminants authorised by long term resource consent approvals when the rural community is loaded with high regulation and land use restriction through PC1.</p> <p>Urban intensification is being encouraged in the Waikato and Auckland within existing centres with substandard and/or failing infrastructure discharging contaminants into the</p>	Oppose	Watercare opposes the submission points, as an enabling framework for regionally significant infrastructure is essential for the efficient and effective operation of municipal services. Long term resource consents are appropriate where the effects can be managed appropriately. Urban intensification and growth in the Waikato and Auckland is managed through the land use planning framework and a requirement to provide for both the ongoing operation of existing development but also the future development (and associated discharges) is required.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				Waikato catchment. Noting Auckland discharges wastewater to the Waikato via Tuakau. As urban development proceeds and continues to degrade water quality the future nutrient allocation framework will be unfairly weighted towards urban activities at the expense of rural production activities and the production of food to feed the urban activities.		
PC1-3345	Saxton, David Christopher	73946	General	DELETE PPC1 and RENOTIFY PPC1 when the entire Waikato catchment can be included. AMEND to provide for the social and economic well-being of the people and communities of the Waikato catchment. AND AMEND to address the other significant water quality issues such as pest fish and bird populations; point source polluters; rubbish dump leachate; human sewage; and runoff from paved areas.	Oppose	Watercare opposes this submission. Watercare provides an essential municipal service in treating and appropriately discharging wastewater from communities. Watercare's assets and services provide for the social and economic wellbeing of the community and can be managed appropriately through the consenting regime for point source discharges.
PC1-11566	Waikato River Authority	74033	General	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.	Support	Watercare supports the submission point that cumulative increase in contaminant loads should be managed.
PC1-1651	Wills, Alan Bryan	72954	General	AMEND PPC1 to provide a review of the use of Nitrogen to cover the 4 contaminants AND AMEND to reconsider the relationship of Nitrogen and Phosphorous	Support	Watercare supports the submitter position that the relationship of nitrogen and phosphorus needs to be reconsidered.
PC1-7251	Wilson, David Lesley	67510	General	AMEND PPC1 to manage all contaminating activities including storm water and treated sewerage discharges. AMEND so that municipal discharges	Oppose	Watercare supports the current approach within PPC1 of including point-source specific objectives and policies.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>are required to improve water quality before discharging. AMEND to include treatment of E.coli/Algal blooms at point of source (e.g. treatment in the hydro lakes). WITHDRAW PPC1 and NOTIFY a plan change that covers the whole region. AMEND so that everyone is treated equally and fairly.</p> <p><i>"It is not fair that farming controls their leaching potential if municipal bodies are allowed to continue discharges to rivers without improvement in water quality before discharging."</i></p>		The discharge of treated wastewater can be appropriately managed and provided for in PPC1 and the effects of individual point source dischargers can be reassessed as part of new discharge consent processes.
PC1-10061	Hamilton City Council	74051	Background and explanation	<p>AMEND Background and explanation page 15 to read as follows "Municipal and industrial point source discharges will also be required to revise their discharges in light of the Vision and Strategy and the water quality objectives, and subcatchment limits and targets that have been set. This <u>new requirement will happen apply</u> as the current consent terms expire. <u>It may take further time, over the 80 year period, for the 80 year targets specified in Table 3.11-1 to be achieved.</u>"</p> <p>Submission states PC1 must give effect to the NPS-UDC.</p> <p>Submission states PPC1 lacks recognition for urban growth.</p> <p><i>"This paragraph sets out the intent of PPC1 that any municipal and industrial point source discharge will be able to continue subject to the conditions of its</i></p>	Support	Watercare supports Hamilton City Council's submission. Watercare also considers PPC1 to have a lack of recognition of urban growth and lack of provisions giving effect to the National Policy Statement for Urban Development Capacity.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p><i>current consent, and the water quality limits and targets set out in PPC1 will apply when the consent is renewed. HCC has made significant investment in its existing wastewater infrastructure and has planned further investment (which is set out in its Long-Term Infrastructure Strategy (2015-2045)). This planning is based on meeting the requirements of its current consents. It would be unreasonable for WRC to expect HCC to comply with different consent conditions before the current consents expire.</i></p>		
PC1-2465	Rotorua Lakes Council	73373	Background and explanation	<p><i>"Such growth will generate more urban stormwater and more wastewater to be treated and discharged into the Waikato River catchment, with consequent changes to the contaminant loads. RLC is concerned that the lack of recognition in PC1 for such growth could result in an effective cap on urban growth in the southern part of the District"</i></p> <p>AMEND 3.11 Background and Explanation to read: "Municipal and industrial point source dischargers will also be required to revise their discharges in light of the vision and strategy and water quality objectives, and sub-catchment limits and targets that have been set. <u>These new requirements will apply as the current consent terms expire. It may take further time, over the 80 year period for the targets specified in Table 3.11-1 to be achieved. Setting new requirements will take into account investment in infrastructure already made, the net benefit from additional investment,</u></p>	Support	Watercare's primary submission noted that PPC1 does not provide sufficient recognition for urban growth. Watercare supports RLC's submission point on this basis.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<u>alternative methods for contaminant reduction."</u>		
PC1-11255	Fonterra Co-operative Group Ltd	74057	Water quality and National Policy Statement for Freshwater Management	<p>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.</p> <p>AMEND all references to 'short term objectives' to read: "short term <u>freshwater objectives</u>"</p> <p>AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater objectives</u>"</p> <p>ADD to the Water Quality and National Policy Statement for Freshwater Management Section (page 14) a final sentence at the end that reads: "<u>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.</u>"</p> <p>MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3</p>	Support	The submitter considers that PPC1 does not give effect to the NPS-FM and requires redrafting to do so. Watercare also considers that PPC1 causes confusion for plan readers around the terminology of objectives and targets, particularly in chapter 3.11. Watercare supports this submission point on this basis.
PC1-7080	Russell, Jill Adrienne	71348	Full achievement of the Vision and Strategy will be intergenerational	<p>AMEND the section Full Achievement of the Vision and Strategy will be Intergenerational to clearly define the standards for water quality that allows swimmability and food to be taken, in relation to current water quality.</p> <p>AMEND the target to achieve 10% reductions in 10 years to be more</p>	Oppose	Watercare opposes this submission point as the practical implications of reviewing all existing consents on implementation could compromise the ability for Watercare to effectively and efficiently operate its services.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>attainable and realistic. AMEND bullet point 3 with regard to the Nitrogen Reference Point to read as follows: "a property scale Nitrogen Reference Point to be established by modelling current nutrient losses from each property with no property allowed to exceed its reference point in the future <u>with a future Nitrogen Reference Point to be calculated as new scientific evidence and technology becomes available</u>". AND AMEND paragraph 6 with regard to municipal and industrial dischargers to read as follows: <i>Municipal and industrial point source dischargers will be required to revise their discharges in light of the Vision and Strategy and the water quality objectives, and sub-catchments limits and targets that have been set.</i> "This will happen as the current consent terms expire. This will happen alongside the plan change with all current consents being up for review.</p> <p>Municipal and industrial consents need to be reviewed and changes to be made to comply with the proposed plan, without waiting for the term to expire. Farmers are having their consents revaluated well before the expiration date. Municipal and industrial discharge along the catchment area would have a substantial effect on the water quality. E.g. storm water discharge. (petrol, fuel, rubber, detergents). This allows for all contributors to the contaminant of water quality to be required to take action. Municipal and</p>		

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				industrial discharge should be reduced by the same percentage of contamination as agriculture. This puts the responsibility on all sectors to reduce contamination at the same rate.		
PC1-3721 PC1-1037	Hathaway, Bruce Hathaway, John	73868 71390	Reviewing progress toward achieving the Vision and Strategy	<p>AMEND Reviewing process toward achieving the Vision and Strategy Paragraph 4, to read: "...a property scale Nitrogen Reference Point to be established by modelling current nutrient losses from each property, with no property being allowed to exceed its reference point in the future <u>with future Nitrogen Reference Point to be recalculated as new scientific evidence and new technology becomes available.</u>"</p> <p>AMEND Paragraph 6 to read: "...municipal and industrial point discharges, will be required to review their discharges as the current consent terms expire alongside PPC1 with all current consents being up for review."</p> <p>AND AMEND Paragraph 1 to read: "... with on farm actions <u>land based and recreational activities</u> carried out and point source discharges reviewed as existing resource consents come up for renewal <u>with existing resource consents to be reviewed.</u>"</p> <p><i>"All discharges inside the Waikato catchment should be a part of the change, with not just targets on farmers. These municipal and industrial consents need to be reviewed and changes to be made to comply with the proposed plan, without waiting for the term to expire. Farmers are having their consents</i></p>	Oppose	Watercare opposes this submission point as the practical implications of reviewing all existing consents on implementation could compromise the ability for Watercare to effectively and efficiently operate its services.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>reevaluated well before the expiration date. Municipal and industrial discharge along the catchment area would have a substantial effect on the water quality. E.g. storm water discharge. (petrol, fuel, rubber, detergents). This allows for all contributors to the contaminant of water quality to be required to take action. Municipal and industrial discharge should be reduced by the same percentage of contamination as agriculture. This puts the responsibility on all sectors to reduce contamination at the same rate."</p>		
PC1-10136	Hamilton City Council	74051	Mana Tangata – Use Values Water Supply	<p>AMEND Municipal and domestic water supply to read: "Municipal, community, industrial, commercial and domestic water supply" "The rivers provide for <u>municipal, community, industrial, commercial and domestic</u> water supply, municipal supply, drinkable water supply and health which is essential for life and enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety.</p>	Support	Watercare relies upon a large water take from the Waikato River to provide water supply for customers. The amendments sought by Hamilton City Council encompass the varied end use of the water supply and the benefits for wellbeing and health and safety.
PC1-5301	Aston, Penelope	73811	Objective 1	<p>AMEND Objective 1 to include discharges from other point sources of pollution including urban discharges. AND AMEND timeframe of PPC1 to 20-30 years, with clearly established science based interim targets and bottom lines for water quality established up front.</p>	Oppose	Watercare opposes this submission, as point source discharges are appropriately provided for and managed by Policies 11-13.
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PC1-12313	Oji Fibre Solutions (NZ) Limited	73725	Reasons for adopting Objective 3	<p>DELETE from the Reasons for Adopting Objective 3: "Point source discharges are currently managed through existing resource consents, and further action</p>	Oppose	Watercare seeks retention of the wording of objective 3.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				required to improve the quality of these discharges will occur on a case by case basis at the time of consent renewal, guided by the targets and limits set in Objective 1."		
PC1-8521	Reeves and Taylor, James Gordon Livingston and Amy Louise	71614	Reasons for adopting Objective 3	DELETE this text from the reasons for adopting Objective 3: "Point source discharges are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case at the time of consent renewal, guided by the targets and limits set in Objective 1."	Oppose	Watercare seeks retention of the wording of objective 3.
PC1-10748	Fulton Hogan Limited	74048	3.11.3 Policies	NEW Policy to follow an amended Policy 11 to read as follows: "Policy 11A: <u>Offsetting the effects of point source discharges:</u> <u>Where it is not practicable to avoid or mitigate any significant adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge provided that:</u> <u>a) The primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and</u> <u>b) The offset measure is for the same contaminant; and</u> <u>c) The offset measure occurs within or upstream of the sub-catchment in which the primary discharge occurs.</u> <u>d) The offset measure is monitored and results in a net reduction in adverse environmental effects on the Waikato and Waipā River catchment caused by nitrogen, phosphorous, sediment and/or microbial pathogens; and</u> <u>e) The offset measure remains in place for the duration of the consent and is secured by consent condition or another</u>	Support	Watercare to support this submission as the new policy relates to offsetting only for significant adverse effects.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				legally binding mechanism."		
PC1-10259	Hamilton City Council	74051	3.11.3 Policies	<p>ADD a NEW Policy that reads: "<u>Policy 5a: New urban development</u> <u>Allow urbanisation of land that gives effect to the Waikato Regional Policy Statement, which will result in increased volumes of storm water and treated wastewater and may result in increased discharges of contaminants.</u>"</p> <p><i>PPC1 needs to recognise that treated stormwater and treated wastewater will contain residual, irreducible contaminant concentrations, despite passing through a series, or train, of treatments or treatment devices.</i></p> <p><i>In order for PPC1 to give effect to the RPS, and thereby satisfy the requirement of s.67(3)(c) of the RMA, a policy should be added to PPC1 to allow for this urban development, and to recognise the effects of this development on contaminant loads and the volumes of stormwater and treated wastewater that need to be discharged.</i></p> <p>AND ADD a NEW policy to read as: <u>"Policy 10a: Revision of existing consented municipal and industrial point source discharges at the expiry of existing consent terms Incorporate the requirements of the Vision and strategy, the water quality objectives, and sub-catchment limits and targets into the consent conditions for point source discharges from regionally significant infrastructure, including municipal water supplies, wastewater and storm water infrastructure, and regionally significant</u></p>	Support	Watercare to support HCC's additional policy providing for urban growth and development, and recognising associated changes to discharge as a result.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p><u>industry when the current consents expire and are renewed, while recognising the benefits to communities of the continued operation of such activities, which are provided for in Policy 10."</u></p> <p><i>"The "Background and explanation" (PPC1, p.15) includes: "Municipal and industrial point source dischargers will also be required to revise their discharges in light of the Vision and Strategy and the water quality objectives, and sub-catchment limits^ and targets^ that have been set. This will happen as the current consent terms expire." HCC supports this principle and seeks for it to be secured in PPC1 by inclusion of a relevant objective, policy and rule."</i></p> <p>AND ADD a NEW Policy as follows: "<u>Policy 12a: Consideration of the effects of land use change on discharges</u> <u>When considering a consent application to discharge contaminants from a changed land use, take into account any changes in contaminant load resulting from the change in land use as well as the contaminants associated with the new activity being consented."</u></p>		
PC1-2470	Rotorua Lakes Council	73373	3.11.3 Policies	<p>AMEND 3.11.3 Policies by adding a new policy as follows: "<u>Policy X: New and intensified urban development.</u> <u>Allow urbanisation of land that gives effect to the Waikato Regional Policy Statement and Territorial Authority Spatial Plans which will result in increased volumes of storm water and</u></p>	Support	Watercare supports the intent of the new policy proposed for new and intensified urban development.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p><u>treated wastewater and may result in increased discharge of contaminants. It is also recognised that given improvements in waste water treatment technology and urban design, urban development can and will over the coming years become more effective at removing contaminants relative to other land uses."</u></p> <p><i>Allowance should be made within PC1 for the establishment of new and intensification of existing urban development, in order for communities to provide for their social, economic and cultural wellbeing. Further, there needs to be acknowledgement that urban development and associated development and improvement of waste water infrastructure can be an effective method of removing contaminants, compared to other uses of the land.</i></p> <p>AMEND 3.11.3 Policies by adding a new policy as follows: <u>"Policy X: Consideration of the effects of land use change on discharges. When considering a consent application to discharge contaminants from a proposed change in land use, take into account any changes in contaminant load and profile, alongside the contaminants associated with the new activity for which consent is being sought."</u> AND MAKE any consequential amendments.</p>		
PC1-11560	Waikato River Authority	74033	3.11.3 Policies	The proposed Plan Change does not currently contain an explicit statement that further degradation of water quality	Oppose	Watercare opposes this submission point as contaminant load could increase in wastewater discharge with the anticipated

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				or increases in load for the contaminants addressed by the Plan Change shall not occur. Such a statement should be added as a policy.		growth for the area, however such increases could be subject to offset measures. PPC1 currently recognises this.
PC1-12607	Hathaway, John	71390	Policy 1	AMEND Policy 1 to include diffuse and point of source discharges AND AMEND Policy 1(b) to read: "Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>through a managed approach</u> ; and" AND ADD to Policy 1 a new clause (d) to read: " <u>Requiring point of source activities with moderate to high levels of contaminants to reduce to their discharges to water bodies through a managed approach.</u> "	Oppose	Watercare opposes this submission point of including point source discharges into Policy 1 as point source discharges are different from diffuse discharges and provisions related to farming and appropriately managed in Policies 10-13 of PPC1.
PC1-12649	Russell, Jill Adrienne	71348	Policy 1	ADD Policy 1(d) to read as follows: " <u>requiring point [of] source activities with moderate high levels of contaminant to reduce [to] their discharges to water bodies through a managed approach</u> ".	Oppose	Watercare opposes this submission point of including point source discharges into Policy 1 as point source discharges are different from diffuse discharges and provisions related to farming and appropriately managed in Policies 10-13 of PPC1.
PC1-9580	Advisory Committee on Regional Environment (ACRE)	72441	Policy 10	AMEND Policy 10 to make it clear that policies 11 and 12 apply to discharges under Policy 10. AND AMEND Policy 10, 11 and 12 to strengthen in terms of urban centres. <i>Under Policy 10 the Plan is to provide for point source discharges of regional significance. Specifically, determinations on resource consent applications for point source discharges of contaminants are to provide for the continued operation of regionally</i>	Oppose	Watercare opposes this submission as Policies 10-12 (with amendments sought by Watercare) are appropriate for regionally significant infrastructure as distinct from farming/diffuse discharges. Given the future growth in the Waikato, Watercare does not support a requirement for reduction in point source discharges.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p><i>significant infrastructure and regionally significant industry. Policy 11 qualifies this provision by requiring the implementation of the "Best Practicable Option" and offsets, but Policy 12 allows the consideration of past efforts, the significance of the discharge and the practicability of improvement. This has the appearance of soft treatment for the urban centres and these three policies should be strengthened.</i></p> <p><i>Policy 10 could be interpreted as making no requirements for improvement in the levels of pollutants from point source discharges. The Plan Change should aim for reduction in these discharges.</i></p>		
PC1-10884	Auckland/Waikato Fish and Game and Eastern Region Fish and Game	74085	Policy 10	<p>DELETE Policy 10 OR AMEND to be included as another consideration in Policy 12.</p> <p><i>Although Fish and Game recognises the role and significance of regionally significant infrastructure and industry this strongly worded Policy (which includes the words "provide for") is inappropriate as a stand-alone provision. There is no mention of the need to reduce these discharges at the same time as diffuse and other point source discharges are being required to reduce. These discharges need to be put onto an equitable and appropriate trajectory of improvement, and measured against the long and short term targets.</i></p>	Oppose	Watercare opposes this submission as Policy 10 is appropriate and necessary for enabling regionally significant infrastructure to continue to operate and provide for growth that will come with intensification in the future.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
PC1-10676	Department of Conservation	71759	Policy 10	<p>AMEND Policy 10 to ensure that point source discharges are undertaken in a manner that recognises and provides for the values of individual water bodies.</p> <p><i>The Director-General considers that Policy 10 as written does not recognise the significant values of the receiving waterbodies. The Director-General seeks that the policy be amended to ensure that point source discharges are undertaken in a manner that recognises and provides for the values of individual water bodies. To do this, the specific values of waterbodies need to be identified as a requirement of Policy CA2(b) of the NPSFM and is critical to implementing appropriate freshwater objectives for waterbodies.</i></p> <p><i>Point source discharges should be considered as part of any landbased allocation regime which the Director-General has sought be immediately implemented. In the absence of this, the Director-General consider that the achievement of water quality goals needs to be considered when considering resource consent applications for point source discharges. The Director-General seeks further clarification over the term "regionally significant industry" as no clarity is provided about what this term means and therefore the implications of this are unclear.</i></p> <p>AND AMEND PPC1 so that point source discharges are considered as part of a</p>	Oppose	Watercare opposes the Department of Conservation's submission point on the basis that Policy 10 provides an enabling framework for regionally significant infrastructure, which provides for ongoing Watercare services.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				land-based allocation regime. OR AMEND to ensure that the achievement of water quality goals is considered when processing consent applications for point source discharges. AND provide a definition for 'regionally significant industry'.		
PC1-8799	Genesis Energy Limited	74052	Policy 10	RETAIN Policy 10 and the Regional Policy Statement definitions of 'regionally significant infrastructure' and 'regionally significant industry'.	Support	Watercare supports the use of these definitions.
PC1-10755	Hamilton City Council	74051	Policy 10	AMEND Policy 10 to include a new provision to read: " <u>c. Continued operation of regionally significant infrastructure associated with the provision of municipal water supply, wastewater and storm water services, including where this is in response to growth in urban development to give effect to the Waikato Regional Policy Statement.</u> "	Support	Watercare supports Hamilton City Council's proposed amendments as these align with Watercare's original submission position that Policy 10 needs to provide for existing services and further expansion to service future population growth.
PC1-10509	Henson, Edgar	73631	Policy 10	AMEND Policy 10 to provide that all point source discharge resource consents are reviewed immediately in line with PPC1.	Oppose	To review all consents immediately will have practical implications in terms of time and resourcing.
PC1-5886	Huirimu Farms Ltd	72582	Policy 10	AMEND Policy 10 by treating all industry/infrastructure equally regardless of the industry and all consents are reviewed immediately.	Oppose	To review all consents immediately will have practical implications in terms of time and resourcing.
PC1-6414	J Swap Ltd	71618	Policy 10	AMEND Policy 10 as follows - "Policy 10: Provide for point source discharges <u>from activities</u> of regional significance	Support	Watercare supports this submission point in relation to future expansion and development of regionally significant infrastructure. Watercare's original

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>When deciding resource consent applications for point source discharges of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, <u>subject to Policy 11 and Policy 12</u> provide for the:</p> <p>a) Continued operation <u>and development</u> of regionally significant infrastructure; and</p> <p>b) Continued operation <u>and development</u> of regionally significant industry."</p>		<p>submission sought amendment of Policy 10 to include addition for future development to service growth, which is aligned with J Swap Ltd's intent.</p>
PC1-4077	Lakes and Waterways Action Group Trust (LWAG)	53342	Policy 10	<p>Ref: Policy 10. 11. & 12 regarding point source discharges. LWAG have supported Taupo District Council in complying with Variation 5 including through Consent renewals for Wastewater Treatment (WWT) Plants and especially their consented discharge allowances.</p> <p>Considerable nutrient reductions to land can be achieved though the upgrade of WWT Plants, their discharge fields and their discharge consent conditions.</p> <p>Our concern is with the consent renewal process. Current policy means it will take many years for the process to be completed, as is occurring in Taupo. We feel that if agriculture and horticulture are expected to reduce their emissions, then the urban community should have clear short and long term targets outlined in PC1.</p> <p>Relief sought: That short- and long-term</p>	Oppose	<p>Watercare considers that consent expiry or consent conditions review is the appropriate time for reviewing existing consent conditions.</p>

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>targets be defined in this policy.</p> <p>Relief sought: that WRC resources be increased to support the consent renewal process such that defined short and long term targets of these policies are complied with.</p>		
PC1-3505	Matamata-Piako District Council	73419	Policy 10	<p>RETAIN Policy 10 and amend to provide the following definitions: "<u>Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply dams and ancillary infrastructure.'</u>"</p> <p>AND "<u>Regionally significant industry means 'an economic activity based on use of natural and physical resources in the region which have benefits that are significant at a regional or national scale.'</u> These may include social, economic or cultural benefits or a combination thereof. <u>Regional significant industry includes:</u></p>	Support	Watercare supports the recognition and certainty provisions for significant investment in infrastructure services and the need for the RPS definition to be reflected for regionally significant infrastructure.
PC1-6426	Oji Fibre Solutions (NZ) Limited	73725	Policy 10	<p>AMEND Policy 10 to read:</p> <p>"...When deciding resource consent applications for point source discharges of nitrogen, phosphorus, sediment and/ or microbial pathogens to water or onto or into land, provide for the:</p> <p>a. Provide for the Continued operation of regionally significant infrastructure; and</p> <p>b. Provide for the Continued operation or</p>	Support	The amendments requested are in keeping with Watercare's submission, in that they provide for regionally significant infrastructure.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				expansion of regionally significant industry"		
PC1-9401	Osborne, Bob, Judy, Kim and Janette	73249	Policy 10	<p>AMEND Policy 10 to ensure all point source discharge resource consents are reviewed immediately in line with PPC1</p> <p>AND AMEND to ensure all industry/infrastructure is treated equally regardless of the industry</p> <p>AND AMEND to ensure a sub-catchment approach is adopted to address all contaminants.</p>	Oppose	To review all consents immediately will have practical implications in terms of time and resourcing.
PC1-2507	Rotorua Lakes Council	73373	Policy 10	<p>AMEND Policy 10 by inserting the following sub clause:</p> <p><u>"c) Continued operation of regionally significant infrastructure associated with the provision of municipal water supply, wastewater and storm water services, including where needed in response to urban development growth that gives effect to the Waikato Regional Policy Statement and Territorial Authority Spatial Plans."</u></p> <p>AND MAKE any consequential amendments.</p>	Support	Watercare supports this submission point as it aligns with Watercare's submission to provide for future development to service population growth.
PC1-4056	South Waikato District Council	72892	Policy 10	<p>RETAIN Policy 10.</p> <p>AND ADD a definition for regionally significant infrastructure: <u>"Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply</u></p>	Support	Watercare supports the recognition and certainty provisions for significant investment in infrastructure services and the need for the RPS definition to be reflected for regionally significant infrastructure.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p><u>dams and ancillary infrastructure."</u></p> <p>AND ADD a definition of regionally significant industry: "<u>Regionally significant industry means 'an economic activity based on 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 or a combination thereof</u> Regional significant industry includes:</p> <p>a) <u>Dairy manufacturing sites;</u></p> <p>b) <u>Meat processing plants; and</u></p> <p>c) <u>Pulp and paper processing plants."</u></p>		
PC1-5026	Stevenson Resources Limited	73732	Policy 10	<p>AMEND Policy 10 to read: "Policy 10: Provide for point source discharges <u>from activities</u> of regional significance.</p> <p>When deciding resource consent applications... to water and onto or into land, subject to Policy 11 and Policy 12 provide for the:</p> <p>a) <u>Continued operation and development of regionally significant infrastructure;</u> and</p> <p>b) <u>Continued operation and development of regionally significant industry."</u></p> <p>AND ADD a definition of regionally significant industry [submission point glossary of terms].</p>	Support	Watercare supports this submission point in relation to future expansion and development of regionally significant infrastructure. Watercare's original submission sought amendment of Policy 10 to include addition for future development to service growth, which is aligned with Stevenson Resources Limited's intent.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				Submission point is the same as that of GBC Winstone above.		
PC1-8112	Taupo District Council	74207	Policy 10	<p>RETAIN the intent of Policy 10</p> <p>AND AMEND to recognise the monitoring undertaken during the operation of consented wastewater activities when assessing and considering resource consent renewal</p> <p>AND AMEND to ensure the definition of regionally significant infrastructure includes storm water infrastructure.</p>	Support	Watercare supports the submission point to retain the intent of Policy 10 and that consent renewal is the appropriate time to consider existing consented activities.
PC1-8263	The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	Policy 10	<p>DELETE Policy 10</p> <p>OR AMEND to define regionally significant infrastructure</p> <p>AND REMOVE industry from Policy 10 and ensure that regionally significant infrastructure and industry are considered in establishing any nutrient allocation approach, and that they meet best practice; and undertake measures to ensure water quality targets are achieved.</p> <p>AND CLARIFY how new activities are to be addressed.</p>	Oppose	Although Watercare agrees that there is some uncertainty in Policy 10, Watercare opposes this submission point as deletion of Policy 10 is not appropriate. Policy 10 is important for providing for regionally significant infrastructure point source discharges.
PC1-3129	Waikato District Council (WDC)	73418	Policy 10-13	<p>RETAIN Policy 10-13.</p> <p><i>In summary, provisions:</i></p> <ul style="list-style-type: none"> • clarify that consented point source activities can continue for the duration of consent; 	Support	Watercare supports Waikato District Council's submission point and retention of Policy 10.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<ul style="list-style-type: none"> • provide for 'regionally significant infrastructure'; • recognise the lower contamination magnitude that consented point source discharges contribute given past investment, and; • provide specify mitigation options at the time of renewal (increased duration/offset and adoption of Best Practical Option (BPO)) 		
PC1-10318	Waitomo District Council	73688	Policy 10	<p>RETAIN Policy 10.</p> <p>AND AMEND the Policies to address the policy disconnect between Policies 10 to 12 and Policy 6 [Policies 10 to 12 assume that certain discharges can have an adverse effect to a point and may increase, but Policy 6 does not make the same allowance].</p>	Support	Watercare supports retention of Policy 10.
PC1-10887	Auckland/Waikato Fish and Game and Eastern Region Fish and Game	74085	Policy 11	<p>AMEND Policy 11 to read:</p> <p>d. Offset measure remains in place for the duration of the consent and is secured by consent condition <u>and, if necessary, a bond in order to ensure it is achieved and maintained in the long term preferably in perpetuity; and</u></p> <p>No further discussion of bonds .</p>	Oppose	Watercare's position is that any offsetting should be linked to the consent duration and not in perpetuity.
PC1-10601	Fonterra Co-operative Group	74057	Policy 11	<i>Fonterra does not consider it appropriate to combine these two concepts in a</i>	Support	Watercare supports the submission point in principle.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
PC1-5027	Ltd Stevenson Resources Limited	73732		<p><i>single policy as they are separate, albeit potentially related matters.</i></p> <p><i>Fonterra therefore proposes Policy 11 is split into two policies to separate Best Practicable Option from offsetting. A consequential amendment to the title of Policy 11 is required together with a new Policy 11A and associated title.</i></p>		
PC1-6521	Taniwha Estate Ltd	72146		<p><i>Fonterra also proposes that the policy on offsetting (renumbered as Policy 11A) be amended to include new sub-clause d) to replace the sentence deleted in the chapeau (i.e. "ensure positive effects to lessen any residual effects" .. . etc.). This improves the clarity and readability of the sub-clause and ensures the offset measure is monitored to confirm its effectiveness.</i></p> <p><i>Fonterra also proposes amendments to sub-clause (e). A consent condition may not always be the most appropriate mechanism for securing an offset. For example, a covenant could be used which may provide greater protection for the offset measure than a consent condition.</i></p>		
PC1-10747	Fulton Hogan Limited	74048	Policy 11	<p><i>Fulton Hogan does not consider it appropriate to combine these two concepts in a single policy as they are separate, albeit potentially related matters.</i></p>	Support	Watercare supports the submission point in principle.
PC1-2947	GBC Winstone	73992				
PC1-6417	J Swap Ltd	71618		<p><i>It is not appropriate for renumbered Policy 11A to apply to all adverse effects</i></p>		

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<i>as the RMA is not a “no effects” statute. Fulton Hogan proposes an amendment to address this matter. Fulton Hogan also proposes that re-numbered Policy 11A is amended to include new sub-clause d) to replace the sentence deleted in the chapeau (i.e. “ensure positive effects....to lessen any residual effects”...etc.). This improves the clarity and readability of the sub-clause and ensures the offset measure is monitored to confirm its effectiveness.</i>		
PC1-9972	Lumbercorp NZ Ltd	71753	Policy 11	AMEND Policy 11 to avoid any interpretation that the obligation to avoid, remedy or mitigate the adverse effects of a point source discharge is greater than or extends beyond application of the Best Practicable Option as determined at the time an approval is obtained.	Support	Watercare supports the submission point that the interpretation should not extend beyond application of the BPO at the time an approval is obtained.
PC1-3713	New Zealand Steel Ltd	73790		AND AMEND Policy 11 to read: "Where it is not practicable to avoid or mitigate all adverse effects, an offset measure may be proposed <u>BPO in the context of point source discharges will be interpreted to include the ability to propose an offset measure in an alternative location or locations to the point source discharge for the purpose of..."</u>		
PC1-3062	Waikato River Authority	73418	Policy 11	<i>Policy 11 makes offset mitigation optional (uses the word ‘may’), and only specifies a lessening of adverse effects through offset mitigation. We would like to see Policy 11 amended to explicitly</i>	Oppose	Watercare opposes this submission point as offsetting may not be required in some situations, for example, where improvements in wastewater treatment technology could in the future lead to

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<i>require offsets (rather than 'may'), and to result in a net contaminant loss improvement.</i>		improvements in water quality directly. In that case offsetting would not be required.
PC1-10843	Hamilton City Council	74051	Policy 12	<p>AMEND Policy 12 to read as:</p> <p><u>"When considering consent applications for point source discharges, Consider</u> the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short term targets in Objective 3 or the progression towards the 80-year targets in Objective 1, taking into account <u>where applicable;</u></p> <p>a. The relative proportion of nitrogen, phosphorus, sediment or microbial pathogens that the particular point source discharge contributes to the catchment load; and</p> <p>b. Past <u>modelling, monitoring and</u> technology upgrades undertaken to model, monitor <u>understand</u> and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term; and</p> <p>[no change to c) and d)]</p> <p><u>e. Seasonal climatic conditions affect biological processes within water bodies and wastewater treatment plants, which means the contaminant assimilative capacity of the waterbodies and the contaminant reducing capacity of the</u></p>	Support	Watercare seeks strengthening of Policy 12 to consider seasonal climatic conditions within receiving environments and Wastewater Treatment Plants.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p><u>plants change with the seasons; and</u></p> <p><u>f. Other natural processes within waterbodies that affect the waterway's capacity to assimilate contaminants."</u></p>		
PC1-4080	Lakes and Waterways Action Group Trust (LWAG)	53342	Policy 12	<p>AMEND Policy 12 to define short and long term targets for Waste Water Treatment Plants.</p> <p>AND CONSIDER increasing Waikato Regional Council resources to support the consent renewal process such that the defined short and long term targets in PPC1 are complied with.</p>	Oppose	Watercare opposes this submission point as short and long term targets for dischargers is inconsistent with the 'effects based' approach of the RMA.
PC1-9290	Maniapoto Maori Trust Board	73730	Policy 12	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen catchment loads <u>within a subcatchment</u> and the impact of that contribution on the likely achievement of the...	Oppose	Watercare notes that the diminishing return on investment is a matter worth considering in the assessment of the BPO. By retaining this wording capital investment may be better spent elsewhere to achieve greater environmental benefit.
PC1-11741	Maungatautari Marae	73990				
PC1-11890	McLean, Parekawhia	73359				
Pc1-11588	Ngaati Tamaoho Trust Te Taiao	74088				
	Roopuu					
	Ngati Haua Iwi Trust					
PC1-11840	Poohara Marae	73515				
PC1-12016	Potini Whaanau	73545				
PC1-11692	Raukawa Charitable Trust	74089				
PC1-10556	Te Arawa River	74073				

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
	Iwi Trust					
PC1-11789	Te Awamaarahi Marae Trustees	73697				
PC1-11983	Te Kauri Marae	74168				
PC1-11638	Te Runanga o Ngati Kea Ngati Tuara Trust	74124				
PC1-12250	Te Taniwha o Waikato	73543				
	Te Whakakitenga o Waikato					
PC1-12065	Incorporated (Waikato-Tainui)	73361				
PC1-7931	Turangawaewae Marae	74105				
	Tuwharetoa Maori Trust Board					
	Waahi Pa Marae Committee					
PC1-12193	Waahi Whaanui Trust	74173				
PC1-10343	Waikato and Waipa River Iwi	73356				
PC1-12131		73751				
PC1-11973		73537				

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
PC1-3353		74035				
PC1-10900	Auckland/Waikato Fish and Game and Eastern Region Fish and Game	74085	Policy 13	<p>DELETE Policy 13</p> <p>OR AMEND to read:</p> <p>"Point source consent duration</p> <p>When determining an appropriate duration for any point source consent granted consider the following matters:</p> <p>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</p> <p><u>aa. The sensitivity of the receiving environment and the adequacy/certainty of information that is available; and</u></p> <p><u>ab. 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></p> <p>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</p>	Oppose	Watercare opposes this submission point, particularly deletion of Policy 13, as Policy 13 is important for considering the appropriate duration of any resource consent.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>quality;</p> <p>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)."</p> <p>AND AMEND to include guidance on consent term for diffuse discharges which should be aligned with sub-catchment progress review timeframes as specified in Table 3.11-2.</p>		
PC1-10739	Department of Conservation	71759	Policy 13	AMEND Policy 13 to include a common catchment expiry date for consent terms rather than a blanket 25 year consent term.	Oppose	Watercare opposes this submission point as a common catchment expiry date will not be practical given activities have different appropriate consent durations.
PC1-11038	Hamilton City Council	74051	Policy 13	<p>AMEND Policy 13 as follows:</p> <p>"c. The need to provide appropriate certainty of investment where contaminant reduction measures are proposed (including investment in treatment plant upgrades, or land based application technology, or offsets);-; and</p> <p><u>d. In respect of a municipal discharge, in addition to a, b and c above, allow a consent term for a period of 35 years, where the proposed treatment of the water and any contaminants prior to discharge, and any offset measures, are predicted to ensure the standards specified in the consent will be met for the duration of the consent.</u>"</p>	Support	Watercare supports Hamilton City Council's submission point as it seeks to provide certainty for long term infrastructure.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
PC1-3769	Hathaway, Bruce	73868	Policy 13	Delete Policy 13(a)	Oppose	Watercare opposes deletion of Policy 13, as Policy 13 is important for considering the appropriate duration of any resource consent.
PC1-1059	Hathaway, John	71390				
PC1-6561	Oji Fibre Solutions (NZ) Limited	73725				
PC1-7247	Russell, Jill	71348				
PC1-7400	Adrienne Ward, Bruce	73286				
PC1-1585	McKenzie, Colin and Valerie	71225	Policy 13	AMEND Policy 13 to ensure all industries are subject to 10 year, sinking lid policy so that the load of change is shared amongst the whole community. AND AMEND Policy 13 to ensure all industries are treated equally.	Oppose	Watercare opposes this submission point as the proposed amendments to Policy 13 are not considered appropriate.
PC1-5969	Pamu Farms of New Zealand by Landcorp Farming Ltd	74000	Policy 13	DELETE Policy 13 OR provide a similar level of recognition and protection for non-point sources.	Oppose	Watercare opposes deletion of Policy 13, as Policy 13 is important for considering the appropriate duration of point source discharge resource consents.
PC1-5733	Save Lake Karapiro Inc	72459	Policy 13	AMEND Policy 13 by reducing the timeframe to 10 years with 10 year automatic rollover if audits are clean.	Oppose	Watercare opposes this submission point as the proposed amendments to Policy 13 to a 10 year timeframe are not considered appropriate.
PC1-8325	The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	Policy 13	AMEND Policy 13 to read as follows: "Policy 13: Point sources consent duration. When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 years,	Oppose	Watercare opposes this submission point as Policy 13 should include specific reference to Policies 11 and 12.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and whether the applicant demonstrates that the discharge is consistent with the water quality attribute targets set out in Table 3.11-1;</p>		
PC1-3095	Waikato Regional Council	72890	Policy 13	<p>AMEND Policy 13(a) to read: "A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies <u>Policy 11 and 12</u> will be met; and..."</p>	Oppose	Watercare opposes the submission point to delete reference to Policy 12 in Policy 13.
PC1-11040	Hamilton City Council	74051	3.11.4.6	<p>AMEND Method 3.11.4.6 as follows:</p> <p><u>"c. When the relevant funding for implementation has been secured through the processes listed in a and b above, or by some other means, implement Chapter 3.11 and work with relevant territorial authorities and stakeholders to implement measures identified in sub-catchment scale plans."</u></p>	Support	Watercare supports this submission point on the basis that WRC should work with other territorial authorities and stakeholders on implementation of PPC1. Note that Watercare is a Council Controlled Organisation (CCO).
PC1-3517	Matamata-Piako District Council	73419	3.11.4.6	<p>ADD two new clauses to Method 3.11.4.6 as follows: <u>"c. Work with territorial authorities to examine options for and to implement contaminant reduction measures associated with point source discharge consents for infrastructure services that are affordable to local communities.</u></p> <p><u>d. Provide financial support for the reviews of District Plans that aim to achieve the alignment of district and</u></p>	Support	Watercare supports this submission point on the basis that WRC should work with other territorial authorities on implementation of PPC1, particularly around point source discharges and infrastructure.
PC1-4104	South Waikato District Council	72892				

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<u>regional planning provisions that give effect to the Vision and Strategy."</u>		
PC1-2516	Rotorua Lakes Council	73373	3.11.4.6	AMEND Method 3.11.4.6 to read: <u>"c. Provide sufficient staff and financial resources to work with local 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.</u> <u>d. Investigate methods of providing PPC1 information on LIM reports.</u> <u>e. Work with local authorities and stakeholders within the catchments to prioritise, develop and implement subcatchment plans."</u> AND MAKE any consequential amendments.		Watercare supports this submission point on the basis that WRC should work with other territorial authorities and stakeholders on implementation of PPC1.
PC1-10324	Waitomo District Council	73688				
PC1-3165	Waipa District Council	67704	3.11.4.6	ADD the following to Method 3.11.4.6: <u>"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.</u> <u>d. Investigate methods of providing PPC1 information on LIM reports."</u>		Watercare supports this submission point on the basis that WRC should work with other territorial authorities and stakeholders on implementation of PPC1.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
PC1-644	Dunlop, Tania	71249	3.11.4.9	AMEND Method 3.11.4.9 to include and enforce rules to stop urban sewage and storm water runoff being discharged into waterways.	PC1-644	Dunlop, Tania
PC1-3992	Falconer, Chris	72027	3.11.4.9	AMEND Method 3.11.4.9 to add a clause that clearly states that no new point source discharges will be permitted and that no additional loading will be placed on existing point source infrastructure. Or such other relief that will address the issue raised in this submission.	PC1-3992	Falconer, Chris
PC1-11041	Hamilton City Council	74051	3.11.4.9	AMEND 3.11.4.9 as follows: "a. Continue to work with territorial authorities to implement the Waikato Regional Policy Statement set of principles that guide future development of the built environment which anticipates and addresses cumulative effects over the long term. <u>aa. Recognise the principles referred to in 'a' above will create pressure for additional storm water and wastewater discharges that needs to be recognised at the time of consenting these discharges.</u> b. When undertaking sub-catchment scale planning under Method 3.11.4.5 in urban sub-catchments <u>with urban area</u> , engage with <u>the relevant territorial authorities</u> , urban communities <u>and other stakeholders</u> to raise awareness of	PC1-11041	Hamilton City Council

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>water quality issues, and to identify and implement <u>implement effective solutions for the urban context measures to manage the adverse effects of activities and development on, and to enhance, water bodies.</u></p> <p><u>c. Work with relevant territorial authorities and stakeholders to implement the measures identified in b above."</u></p>		
PC1-10112	Horticulture New Zealand (HortNZ)	73801	3.11.4.9	<p>AMEND Method 3.11.4.9 to read:</p> <p>"Waikato Regional Council will:</p> <p>a. Continue to work with territorial authorities to implement the Waikato Regional Policy Statement set of principles that guide future development of the built environment which anticipates and addresses cumulative effects over the long term <u>including avoiding the degradation of freshwater resources and discharge of contaminants from urban activities into the urban environment.</u></p> <p>b. When undertaking sub-catchment scale planning under Method 3.11.4.5 in urban sub-catchments engage with urban communities to raise awareness of water quality issues, and to identify and implement effective solutions for the urban context.</p> <p><u>c. Assess the contribution of</u></p>	PC1-10112	Horticulture New Zealand (HortNZ)

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p><u>contaminants to waterbodies from urban areas over time to ensure that urban discharges are accounted for, to allow responsibility for managing urban discharges to be allocated.</u></p> <p><u>d. In evaluating (c) above, publicly report the assessment of contributions and their assessed effect on values for freshwater identified in this plan change."</u></p>		
PC1-2518	Rotorua Lakes Council	73373	3.11.4.9	<p>AMEND Method 3.11.4.9 to read:</p> <p><u>"a. Continue to work with territorial authorities to implement the Waikato Regional Policy Statement set of principles and territorial authority spatial plans that guide future development of the built environment which anticipates and addresses cumulative effects over the long term.</u></p> <p><u>This work should also recognise the ability of urban development in certain circumstances to result in a net overall improvement in contaminant load, and or profile."</u></p> <p>AND MAKE any consequential amendments.</p>	PC1-2518	Rotorua Lakes Council
PC1-9327	Maniapoto Maori Trust Board Maungatautari Marae McLean,	73730	3.11.4.10	<p>AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring network ...</p> <p>Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring</p>	Support	Watercare supports this submission point and ongoing monitoring.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
	Parekawhia			<u>network</u> in each...		
	Ngaati Tamaoho Trust Te Taiao			c. Using state of the... monitoring data including biological monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for...		
	Roopuu					
	Ngati Haua Iwi Trust			d. An information <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens</u> diffuse discharges <u>at the enterprise or property scale...</u> "		
	Poohara Marae					
	Potini Whaanau					
	Raukawa Charitable Trust					
	Te Arawa River Iwi Trust					
	Te Awamaarahi Marae Trustees					
	Te Kauri Marae					
	Te Runanga o Ngati Kea Ngati Tuara Trust					
	Te Taniwha o Waikato					
	Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)					
	Tuwharetoa Maori Trust Board					
	Waahi Pa Marae					

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
	Committee Waahi Whaanui Trust Waikato and Waipa River Iwi					
PC1-11044	Hamilton City Council	74051	Table 3.11-1	AMEND Table 3.11-1 in order to ensure that short term and 80 year targets for Annual Median Ammonia and Annual Maximum Ammonia are meaningful and within the detection limits for current standard analytical methods.	Support	Watercare supports this submission point as this will have implications for future discharge consent processes where ammonia is a contaminant of concern.
PC1-9679	Mercury NZ Limited	73182	Table 3.11-1	<p>RETAIN text under the heading of Table 3.11-1 regarding the intention of water quality targets not to be used as receiving water compliance limits/standards.</p> <p>AND AMEND to establish in Table 3.11-1 additional water quality target sites (monitoring sites) with corresponding short term and long term numerical targets, i.e. one sub-catchment area applying to each water quality target site.</p> <p>AND AMEND Table 3.11-2 and Map 3.11-2 to redefine sub-catchment areas in order to differentiate tributaries from the main stem of the Waikato River, particularly for the Upper Waikato River FMU.</p> <p>AND AMEND the redefined sub-catchment Map 3.11-2, and Table 3.11-1, to include additional sub-catchment</p>	Support	Watercare supports the text under the heading of Table 3.11-1 that the intention of the water quality targets is not to be used as receiving water limits.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>areas: corresponding to each hydro catchment, and any large tributaries entering the Waikato River within the Upper Waikato River FMU. [indicative map titled Additional Sub-Catchment Areas attached to the submission]</p> <p>AND AMEND to identify other tributary catchments as separate sub-catchments based on current land use and land cover.</p>		
PC1-9327	<p>Maniapoto Maori Trust Board</p> <p>Maungatautari Marae</p> <p>McLean, Parekawhia</p> <p>Ngaati Tamaoho Trust Te Taiao</p> <p>Roopuu</p> <p>Ngati Haua Iwi Trust</p> <p>Poohara Marae</p> <p>Potini Whaanau</p> <p>Raukawa Charitable Trust</p> <p>Te Arawa River Iwi Trust</p> <p>Te Awamaarahi</p>	73730	Table 3.11-1	<p>DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment</p> <p>AND CONSIDER undertaking a review of the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge</p> <p>AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and subcatchments</p> <p>AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only</p> <p>AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem</p>	Support	Watercare supports the submission point to review targets for nitrate-nitrogen and ammoniacal nitrogen.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
	Marae Trustees Te Kauri Marae Te Runanga o Ngati Kea Ngati Tuara Trust Te Taniwha o Waikato Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) Turangawaewae Marae Tuwharetoa Maori Trust Board Waahi Pa Marae Committee Waahi Whaanui Trust Waikato and Waipa River Iwi			AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.		
PC1-3238	Waipa District Council	67704	Table 3.11-1	ADD the table number (3.11-1) in the title of the table on page 57 AND ADD a definition of 'short term' in Table 3.11-1 as 'by 2026' AND ADD a map identifying the	Support	Watercare supports inclusion of a map for Table 3.11-1 for increased clarity.

Submission point #	Submitter name	Submitter ID	Provision	Submitter Submission point	Watercare to support/oppose	Watercare further submission commentary / relief sought
				<p>locations of the monitoring sites in Table 3.11-1</p> <p>AND ADD an explanation of gaps in the data in the table</p> <p>AND CLARIFY how water quality impacts of flooding are addressed in the targets.</p> <p><i>Most of the monitoring points are not widely known so it is difficult to relate them to FMUs. The water quality targets do not appear to take into account short term impacts such as flooding.</i></p>		
PC1-10208	Hamilton City Council	74051	Additions to Glossary of Terms	AMEND to include a definition for 'regionally significant infrastructure' in PPC1, similar to the definition in the Regional Policy Statement (2016).	Support	Watercare supports the inclusion of the definition of regionally significant infrastructure as contained in the Waikato Regional Policy Statement.