

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO
SUBMISSIONS ON:**

**PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPA
RIVER CATCHMENTS AND VARIATION 1 TO PROPOSED WAIKATO
REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPA RIVER CATCHMENTS**

Name: Winstone Aggregates (a division of Fletcher Concrete and Infrastructure Ltd)

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Winstone Aggregates (a division of Fletcher Concrete and Infrastructure Ltd) (Winstone) is an organisation that has an interest in the proposal that is greater than the interest the general public has because it operates a number of quarries in the Waikato region that can have point source discharges to water bodies.

Winstone wishes to speak at the hearing in support of their further submission.

If others make a similar further submission, Winstone would consider presenting a joint case with them at the hearing.

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	General	PC1-8090	Oppose	The submitter proposes a range of amendments to PC1 but there is insufficient detail to determine the effect of the proposed changes on Winstone's activities.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	General	PC1-13150	Support in part	The submitter seeks the reinstatement of the text and provisions of the plan that relate to the Whangamarino wetland together with a range of associated amendments. Winstone is not necessarily opposed to the proposed amendments but it is difficult to determine the effect of the proposed changes on Winstone's activities, when considered in combination with the other changes proposed by the submitter, such as the inclusion of new Freshwater Management Units (FMUs) (in PC1-10465 and PC1-10504) and the inclusion of new objectives relating to the values of wetlands (PC1-10521).	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Freshwater Management Units	PC1-10465 PC1-10504	Oppose in part	The submitter proposes the inclusion of FMUs for each individual lake and its catchment. This will increase the number of FMUs in PC1 and will increase the amount of work required and associated costs to implement PC1 while it is not clear what additional benefits will result.	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.1	PC1-8131 PC1-8136 PC1-8139 PC1-8152 PC1-8532 PC1-8533 PC1-8535 PC1-8540	Oppose in part	The submitter proposes a number of changes to the text of the section to amend the values and uses for the Waikato and Waipa Rivers. Winstone is not necessarily opposed to amending the values and uses but there is insufficient detail to determine exactly what the changes proposed will be and therefore the effects of the changes on Winstone's activities.	Reject submission in part

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.2 Objectives	PC1-10521	Oppose in part	The submitter proposes the inclusion of a number of new objectives which will significantly change the balance and effect of the existing suite of objectives in PC1. The submitter has not provided proposed text for these new objectives so it is difficult to understand the likely effect of them. This is of concern to Winstone as many of its activities in the Waikato and Waipa River catchments operate under discretionary activity resource consents so the proposed wording of these new objectives could influence Winstone's ability to obtain new consents for its existing and future activities	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Objective 1	PC1-10535	Oppose	The submitter proposes amendment to Objective 1 but does not provide sufficient detail to determine the effect of the proposed changes.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Objective 2	PC1-10537	Oppose	The submitter proposes amendment to Objective 1 but does not provide sufficient detail to determine the effect of the proposed changes.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Objective 3	PC1-10540	Oppose	The submitter is proposing to increase the extent of water quality improvements required within 10 years to 20%. The improvements required by PC1 as notified where developed following an extensive collaborative consultation process between a large number of interested parties. That process resulted in 10% change in 10 years being agreed and included in PC1 as notified. Winstone continues to support the 10% change.	Reject submission

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Objective 4	PC1-10542	Oppose	The submitter seeks a number of changes to the objective and the introduction of an alternative allocation regime. There is insufficient detail provided in the submission to understand the likely effects of the proposal on Winstone's activities.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Objective 5	PC1-10545	Oppose	The submitter proposes changes to Objective 5 but does not provide sufficient detail for Winstone to determine the potential effect of the proposed changes on its activities.	Reject submission.
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.3 Policies	PC-10639	Oppose	The submitter proposes the inclusion of new policies and rules to protect inanga spawning habitat. There is insufficient detail provided in the submission to understand the likely effects of the proposed amendments on Winstone's activities.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Policy 5	PC1-10661	Oppose	The submitter seeks the introduction of an alternative allocation regime. There is insufficient detail provided in the submission to understand the likely effects of the proposal on Winstone's activities.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Policy 6	PC1-10664	Oppose	The submitter proposes the introduction of a Prohibited Activity rule for land use change. Winstone does not consider this appropriate as it may be possible to change landuse without increasing the discharge of contaminants that affect water quality therefore non-complying activity status is appropriate and the ability to apply for a consent should be retained.	Reject submission

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Policy 7	PC1-10667	Oppose	The submitter seeks the introduction of an alternative allocation regime. There is insufficient detail provided in the submission to understand the likely effects of the proposal on Winstone's activities.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Policy 8	PC1-10670	Oppose in part	The submitter seeks the inclusion of all wetland and lake sub-catchments as Priority 1 catchments in Table 3-11.2. Winstone is not necessarily opposed to the proposed amendments but it is difficult to determine the effect of the proposed changes on Winstone's activities, when considered in combination with the other changes proposed by the submitter, such as the inclusion of new Freshwater Management Units (FMUs) (in PC1-10465 and PC1-10504) and the inclusion of new objectives relating to the values of wetlands (PC1-10521).	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Policy 13	PC1-10739	Oppose	Winstone does not consider that a common catchment expiry date as proposed by the submitter is appropriate.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Policy 16	PC1-10745	Oppose	The submitter seeks the introduction of an alternative allocation regime. There is insufficient detail provided in the submission to understand the likely effects of the proposal on Winstone's activities.	Reject submission

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.4	PC1-10633	Oppose in part	The submitter seeks a range of amendments to the implementation methods regarding information collection and management of works on private land. Winstone is not necessarily opposed to the proposed amendments but it is difficult to determine the effect of the proposed changes on Winstone's activities, when considered in combination with the other changes proposed by the submitter, such as the inclusion of new Freshwater Management Units (FMUs) (in PC1-10465 and PC1-10504) and the inclusion of new objectives relating to the values of wetlands (PC1-10521).	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.4.4	PC1-10753	Oppose in part	The submitter seeks a range of amendments to the provisions relating to Lakes and the Whangamarino wetland. Winstone is not necessarily opposed to the proposed amendments but it is difficult to determine the effect of the proposed changes on Winstone's activities, when considered in combination with the other changes proposed by the submitter, such as the inclusion of new Freshwater Management Units (FMUs) (in PC1-10465 and PC1-10504) and the inclusion of new objectives relating to the values of wetlands (PC1-10521).	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.4.7	PC1-10764	Oppose	The submitter seeks the introduction of an alternative allocation regime. There is insufficient detail provided in the submission to understand the likely effects of the proposal on Winstone's activities.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.5	PC1-11054	Oppose in part	The submitter proposes that an evaluation of the rules should occur to determine whether the rules proposed are the most appropriate way to achieve the objectives. If the rules are not the most appropriate, the submitter suggests new rules will be required. There is insufficient detail provided in the submission to understand the likely effects of new rules on Winstone's activities.	Reject submission in part

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.5.7	PC1-11059	Oppose in part.	The submitter proposes the introduction of a Prohibited Activity rule for land use change. Winstone does not consider this appropriate as it may be possible to change landuse without increasing the discharge of contaminants that affect water quality therefore non-complying activity status is appropriate and the ability to apply for consent should be retained.	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Schedule 1	PC1-12393 PC1-12394 PC1-10647	Oppose in part	The submitter seeks a number of amendments to Schedule 1 including inserting requirements to stop existing drainage of wetlands and avoid any future drainage. Winstone is not necessarily opposed to the proposed amendments but it is difficult to determine the effect of the proposed changes on Winstone's activities, when considered in combination with the other changes proposed by the submitter such as the inclusion of new objectives relating to the values of wetlands (PC1-10521).	Reject submission in part
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	3.11.6 List of Tables and Maps	PC1-11061	Oppose	The submitter proposes a range of changes to the tables and the introduction of additional attributes, limits and targets. The attributes, limits and targets that were in PC1 as notified were determined and agreed through an extensive collaborative consultation process. Winstone do not consider that these should be amended or added to.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Table 3.11-1	PC1-10536	Oppose	The submitter proposes a range of changes to the tables and the introduction of additional attributes, limits and targets. The attributes, limits and targets that were in PC1 as notified were determined and agreed through an extensive collaborative consultation process. Winstone do not consider that these should be amended or added to.	Reject submission
Director-General of Conservation Private Bag 3072 Hamilton 3240 Submitters ID 71759	Table 3.11.2	PC1-11067	Oppose	The submitter proposes a range of changes to the tables and the introduction of additional attributes, limits and targets. The attributes, limits and targets that were in PC1 as notified were determined and agreed through an extensive collaborative consultation process. Winstone do not consider that these should be amended or added to.	Reject submission

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Carol Buckley Submitter ID 71421	Policy 10, 11, 12, 13	PC1-1403 PC1-2687 PC1-2688 PC1-2689	Oppose in part	<p>The submitter seeks amendments to PC1 “to be holistic and to manage all matters influencing the health and well-being of the Waikato River and its catchments, including Koi Carp, point sources, and hydro- dams.”</p> <p>Winstone is not necessarily opposed to the intent of this submission point but there is insufficient detail to determined how point sources will be managed and what effect that may have on Winstone’s activities.</p>	Reject submission in part
Peter Buckley Submitter ID 71423	Policy 10, 11, 12, 13	PC1-1403 PC1-2687 PC1-2688 PC1-2689	Oppose in part	<p>The submitter seeks amendments to PC1 “to be holistic and to manage all matters influencing the health and well-being of the Waikato River and its catchments, including Koi Carp, point sources, and hydro- dams.”</p> <p>Winstone is not necessarily opposed to the intent of this submission point but there is insufficient detail to determined how point sources will be managed and what effect that may have on Winstone’s activities.</p>	Reject submission in part
Chris & Vikki Nicholson Submitter ID 72447	Objective 1	PC1-3911	Oppose in part	<p>The submitter seeks amendments to PC1 “to be holistic and to manage all matters influencing the health and well-being of the Waikato River and its catchments, including Koi Carp, point sources, and hydro-dams.”</p> <p>Winstone is not necessarily opposed to the intent of this submission point but there is insufficient detail to determined how point sources will be managed and what effect that may have on Winstone’s activities.</p>	Reject submission in part

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
Chris & Vikki Nicholson Submitter ID 72447	Policy 10	PC1-3941	Oppose in part	The submitter seeks amendments to PC1 “to be holistic and to manage all matters influencing the health and well-being of the Waikato River and its catchments, including Koi Carp, point sources, and hydro- dams.” Winstone is not necessarily opposed to the intent of this submission point but there is insufficient detail to determined how point sources will be managed and what effect that may have on Winstone’s activities.	Reject submission in part
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	General Section 3.11.1 Objective 1	PC1-8188 PC1-8190 PC1-8218	Oppose in part	The submitter seeks a reduction in the timeframe over which the restoration of the Waikato and Waipa Rivers occurs. The timeframe as notified in PC1 was agreed through an extensive collaborative consultation process. Winstone supported the 80-year timeframe contained in PC1 as notified. The submitter also seeks the inclusion of additional water quality objectives. These objectives are very detailed and will be difficult to implement in practice.	Reject submission in part
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Objective 2	PC1-8220	Oppose	The submitter proposes amendments to the Objective that entirely change its intent as notified which is to ensure that economic, social and cultural wellbeing is maintained.	Reject submission
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Objective 3	PC1-8221	Oppose	The submitter proposes amendments to the Objective that entirely change its intent.	Reject submission

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Objective 4	PC1-8224	Oppose	The submitter proposes amendments to the Objective that entirely change its intent.	Reject submission
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Policy 5	PC1-8257	Oppose	The submitter seeks a reduction in the timeframe over which the restoration of the Waikato and Waipa Rivers occurs. The timeframe as notified in PC1 was agreed through an extensive collaborative consultation process. Winstone supported the 80-year timeframe contained in PC1 as notified.	Reject submission
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Policy 10	PC1-8263	Oppose	The submitter seeks a range of changes to the policy that are already addressed in Policies 10-13.	Reject submission
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Policy 11	PC1-8264	Oppose	The submitter opposes the use of nutrient offsetting describing it as inappropriate but does not set out their reasons. The objectives of PC1 are going to be challenging to meet and Winstone considers that innovative responses (including offsetting) will be necessary to achieve the outcomes being sought.	Reject submission
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Policy 12	PC1-8304	Oppose	The submitter seeks a reduction in the timeframes in the policy. The timeframe as notified in PC1 was agreed through an extensive collaborative consultation process. Winstone supports the timeframes as notified.	Reject submission

Submitter Name Address and Submitter ID	Plan Provision	Submission Point ID	Support/Oppose	Reasons	Decision Sought
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID 74122	Rule 3.11.5.7	PC1-8214	Oppose	The submitter seeks an amendment to this rule to make any activity resulting in an increase in diffuse discharges a non-complying activity. Winstone consider that this would be impractical and unworkable.	Reject submission