Our Ref: A3150608

6 March 2019



healthyrivers@waikatoregion.govt.nz To: The Chief Executive & Director Science and Strategy Waikato Regional Council

Private Bay 3038 Waikato Mail Centre Hamilton 3240

Tēnā Koe

## **Further Submission**

## On the: Proposed Waikato Regional Plan Change 1 & Variation 1 to the Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

Bay of Plenty Regional Council is making this Further Submission because, as a neighbouring local authority with cross boundary interests, it has an interest in this Plan Change process which is greater than the general public interest.

Submitter Name & number	The specific provisions BOPRC's further submission relates to are:	SUPPORT / OPPOSE	Reason	RELIEF SOUGHT
Waikato Regional Council Submitter number 72890 Submission point 192	Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments /Nga whainga a-tau taupoto, tauroa hoki mote kounga wai i te riu o nga awa o Waikato me Waipa Table 3.11-:	SUPPORT	Proposed Plan Change 1 interfaces with the Lake Rotorua Groundwater Catchment. This catchment is the focus of Proposed Plan Change 10 requiring reduction in nitrogen to meet these limits in the Bay of Plenty RPS and the TLI in the Regional Natural Resources Plan. Therefore provision needs to be made to address the cross boundary issue of ensuring the integrated management of water quality occurs for the purpose of meeting this operative set limit. In particular the setting of limits for catchments will require that whole catchments are addressed - which brings into sharp focus the issue of cross boundary matters and the need for integrated management. Likewise parts of groundwater catchments draining to water bodies within the Waikato Region are contained within the boundary of the BOP region and management of those FMUs will require both councils to take formal steps to acknowledge limits.	The submission point should be allowed and relevant provisions introduced.

We acknowledge this is a late submission but note that there can be no prejudice arising from the lateness as this issue is already before the Hearing Panel and parties have notice of it as it is set out in the submission of the Waikato Regional Council which this further submission supports. The further submission provides the Hearing Panel with relevant information to assist with understanding that submission.

Initially this matter was being dealt with via correspondence between the two regional councils but as a result of current and ongoing court proceedings the issue of cross boundary responsibilities has been directly raised and should be addressed more formally.

BOPRC acknowledges the existing working relationship between the two councils in terms of addressing cross boundary issues relating to water quality/nutrient management.

Yours sincerely

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Stephen Lamb Manager Environmental Strategy