

Our Ref: A3124764

29 January 2019

Waikato Regional Council  
Private Bag 3038  
Waikato Mail Centre  
Hamilton 3240

Dear Mark Tamura

### **Waikato Regional Council PC1 - Healthy Rivers**

Thank you for your email dated 21 January 2019 and the opportunity to provide further information regarding cross boundary issues. Please note that this feedback has been provided by Council staff as there was insufficient time to consult politicians.

We appreciate the submission to include Lake Rotorua within Table 3.11-1 of PC1. However our attribute setting process (outside of a lake load nitrogen limit) for Lake Rotorua has not yet started and as such the table would be incomplete for the Lake Rotorua catchment.

Rather than inclusion in Table 3.11-1 it may be more appropriate for the Bay of Plenty Regional Council to be involved in the guidance referred to in the S42A report which sets out the approach that will be taken when considering properties that straddle boundaries.

Paragraph 482 of the S42 report states *“WRC have also identified that some properties straddle the boundary between the area regulated by PC1 and other catchment areas as property boundaries do not generally follow catchment boundaries, which will result in two regulatory approaches applying to an individual property. WRC seeks that Section 3.11 “Area covered by Chapter 3.11” is amended to allow consideration of alternatives to the current boundary approach, which will assist in avoiding implementation issues that arise where properties straddle plan boundaries.”*

Para 494 of the S42A *“Officers consider an option which may provide some relief is for guidance to be included in PC1 which sets out the approach that will be taken when considering properties that straddle boundaries. An option for this can be advanced as a part of the relevant rules, when that part of the s42A Report is published.”*

We propose the guidance for properties straddling boundaries includes the following:

***“Where a property lies partly within the Upper Waikato River FMU and partly within the Lake Rotorua groundwater catchment or the Rangitāiki River WMA the rules in PC1 will apply to the whole property (within the Waikato Region) and the relevant BOPRC***

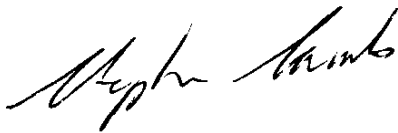
***provisions will be considered when making a decision on a resource consent application under Rule 3.11.5.7.”***

Of importance to BOPRC is that this situation will not be unique. While the cross over between catchment areas/jurisdictional boundaries is in this case small there are other areas (such as the Mamaku area) where the cross boundary issues are more significant. For example approximately 2000ha of the Lake Rotorua Groundwater Catchment is in the Waikato Region.

Given the timing of ongoing plan changes for both WRC and BOPRC we look forward to further collaboration with you to ensure cross boundary issues - such as the interaction between groundwater/surface water catchments - are addressed in upcoming plan changes.

We trust you find our feedback constructive and would be happy to discuss further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Lamb', written in a cursive style.

Stephen Lamb  
**Manager Natural Resources Policy**