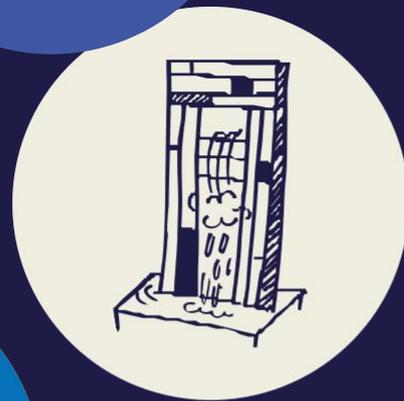


HAMILTON CITY COUNCIL SUBMISSION ON:

**Improving the Protection of Drinking Water Sources
- Proposed Amendments to the Resource
Management (National Environmental Standards
for Sources of Human Drinking Water) Regulations
2007 (January 2022 Consultation Document)
Ministry for the Environment**



28 February 2022



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- A city that's easy to live in
- A city where our people thrive
- A central city where our people love to be
- A fun city with lots to do
- A green city

The topic of this submission is aligned to the priority '**A green city**'.

Water is essential to the improving all Hamiltonian's wellbeing. Water brings life to our people for food, for housing, for jobs, for recreation. It is essential to our wellbeing.

Council Approval and Reference

This submission was approved by Hamilton City Council at its Infrastructure Operations Committee meeting held on 24 February 2022.

Hamilton City Council Reference D-4051234 - submission # 678.

Key Messages

1. Support the overall intent and direction of the January 2022 Consultation Document **Improving the Protection of Drinking Water Sources - Proposed Amendments to the Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007**.
2. Defined Source Water Risk Management Areas and how they are delineated for assessing source water risk is supported.
3. The significance of three waters infrastructure and the essential services they support should be recognised in the NES-DW through providing a level of security for the activity. For example, this may mean that proposed regulations recognise and enable infrastructure planning mechanisms, such as designations of land for essential service provision. Territorial Authorities with responsibilities to enable growth under other legislation may also wish to have a role in determining delineation zones.
4. The NES-DW needs to provide for any planning and investment needed to make changes to infrastructure should this be required to protect source water.
5. More clarity is needed to understand Territorial Authority responsibilities and recognise that Regional Councils are in the best position to regulate source water. More clarity is also needed on mitigation and consenting costs, and any other activities that could impact on source water (such as weed control).
6. The NES-DW must not conflict with higher order direction setting documents such as Te Ture Whaimana o te Awa o Waikato. Recognition of responsibilities under the National Policy Statement for Urban Development should also be recognised.
7. The ability to easily carry out maintenance close to abstraction points is supported, however, emergency provisions should also be included.
8. Retrospective application of the NES-DW to existing activities is not supported unless it is known that the activity will have a detrimental impact on source water, or it falls within review time frames stated in resource consents.
9. The proposal for water supplier involvement in applications is not supported due to the need for knowledge and expertise to provide that approval.

Introduction and Specific Comments

10. Hamilton City Council would like to thank the Ministry for the Environment for the opportunity to make a submission to its January 2022 Consultation Document **Improving the Protection of Drinking Water Sources - Proposed amendments to the Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007**.
11. Hamilton City Council has a key interest in these proposed regulations as a Local Authority regulator, drinking water supplier, and an essential service provider for stormwater and wastewater management, and being a city that has obligations to plan for infrastructure under the National Policy Statement for Urban Development.
12. The Waikato River is the sole source of municipal supply water for Hamilton City. The river is controlled (under consent conditions) by hydropower and is surrounded by high dairy farming activities. The river runs through several municipal areas. River water quality can be challenged by nitrogen, phosphorus, sediment, *Escherichia coli* and geothermal inputs (arsenic).
13. Hamilton City Council also operates a small bore for drinking water on the fringe of the city.
14. Ministry for the Environment 2015 data shows that a 1,773-ha aquifer sits under Hamilton City, Waipa and Waikato Districts. However, information is not available on its vulnerability to land activities. Many small rural ground water bores exist in this area.

15. Hamilton City Council's reticulation network currently supplies a population of approximately 181,467 people. The Waikato Metro Spatial Plan area is forecast to grow significantly to approximately 428,038 people by 2065. This growth, and need for resilience, will likely necessitate another municipal supply water treatment plant in the future. Additional stormwater and wastewater discharge points will also be necessary. These essential services should not be made more complicated to achieve more than is necessary to protect the river.
16. Hamilton City Council also holds key resource consents for the discharge of wastewater and stormwater to the Waikato River and is in the process of preparing an application to renew the City's wastewater discharge consent before expiry in 2027.
17. There is approximately 12km between Hamilton City Council's wastewater discharge point and Ngaaruawaahia's municipal water abstraction point, and approximately three hours travel time in high flow conditions. This places Hamilton City Council's activities within Ngaaruawaahia's Source Water Risk Management Area (SWRMA) 2. Likewise, there are municipal wastewater (Cambridge Wastewater Treatment Plant) and stormwater discharge points upstream of Hamilton City Council's Waiora municipal supply abstraction point, which places them within a SWRMA 2 area.
18. There are an increasing number of wastewater discharge schemes that include land treatment across Aotearoa. There may be a desire and expectation by some iwi that land disposal is considered in wastewater treatment options. It is usual for land disposal to occur as close to the wastewater treatment site as possible to minimise conveyance costs. In addition to soil characteristics, consenting and compliance will be key factors to determine if this cultural approach to wastewater management can be considered.
19. There are a number of groundwater authorisations mapped in Waikato Regional Council's consent database in the vicinity of Hamilton City. However, the purpose for which water is to be used is not always made available. It is therefore difficult to determine potential impacts of the proposed amendments to the NES-DW on Hamilton City Council's activities.
20. Hamilton City Council's discharge activities are subject to future regulation under the Waikato Regional Councils 'Healthy Rivers Plan Change'. This plan change is designed to give effect to the Waikato River Settlement the Act Schedule 2 'Te Ture Whaimana o te Awa o Waikato' (The Vision & Strategy).
21. Te Ture Whaimana o te Awa o Waikato is the primary direction setting document for the Waikato River and Hamilton City Council's activities within its catchment. The Vision is *'a future where a healthy Waikato River sustains abundant life and prosperous communities who, in turn, are all responsible for restoring and protecting the health and wellbeing of the Waikato River, and all it embraces, for generations to come.'* The Healthy Rivers Plan Change interprets this as river water quality that is swimmable and safe to take kai from.
22. Hamilton City Council's submission to the Plan Change supported most provisions provided that sufficient time is provided to allow for planning and investment in infrastructure to meet the targets and rules set out in the proposed plan change. This is relevant to these regulations, which Waikato Regional Council must implement.
23. As a Local Authority in the Waikato River catchment, Hamilton City Council is committed to protecting the health and mauri of the Waikato River for the communities within the City and the wider sub-region and safeguarding drinking water quality.
24. For these reasons, Hamilton City Council supports, in principle, proposed amendments to the NES-DW, but wishes to make some relevant submission points related to:
 - Support for protecting drinking water supplies.
 - Roles and responsibilities.
 - Cost and regulation implications.
 - Responsibilities under other legislation.

- Proposals for how areas are delineated.
- Proposals for how activities are regulated and managed.
- Proposals to protect all water suppliers.

Previous Submissions made in the Three Waters Space

25. Hamilton City Council takes a considerable interest in matters regarding Three Waters and has made numerous submissions in this space in recent years – refer **Appendix 1**.
26. Of particular relevance to source water, Hamilton City Council made the following submission points (summarised):
 - The Water Service Act, in seeking to manage source water risk, required Territorial Authorities to remediate and manage source water in the event of unanticipated discharges, and prepare source water risk management plans (including monitoring). Hamilton City Council considered that some requirements were either above and beyond what Territorial Authorities could necessarily do and that some of that responsibility sat with Regional Councils. This should be reflected in regulations.
 - That, in the response to source water risk management, that the use of the term 'Local Authority' in the Water Services Bill be reviewed where compliance is more aligned with powers and responsibilities of Regional Councils. This should be reflected in NES Regulations.
 - That Regional Councils circulate reporting on source water quality and quantity to water suppliers (or Taumata Arowai could have a duty to provide this information directly to water suppliers). This would assist municipal water suppliers to gauge what treatment should be assessed, planned for and funded through Long Term Planning processes.
 - That the 'Action for Healthy Waterways' objectives of stopping further degradation of freshwater resources; and reversing past damage to bring freshwater resources, waterways and ecosystems to a healthy state within a generation, was supported, but the timeframe of five years (as proposed in the Water Services Regulator Bill) to achieve material outcomes was not achievable.
 - Hamilton City Council also submitted that retrofitting infrastructure to deliver greater environmental outcomes needed assistance from Central Government to plan, fund and design retrofits.
 - Hamilton City Council submitted that upstream resource users (i.e., dischargers) should be required to manage their contaminant discharges to a 'similar extent' as downstream users, with the effect that assimilation capacity of surface water would be distributed over the entire catchment. This would mean that under the proposed NES, that there was equitable application of controls.
 - That three waters infrastructure needed recognition as 'significant infrastructure' across the board in various planning tools. This is important for provision of essential services.
 - That national freshwater policy statements, and regional policy needed to recognise high urban growth will generate more urban stormwater and more wastewater to be treated and discharged to the Waikato and Waipa Rivers and contaminant loads will be higher to the Waikato River. Policy was needed to provide for these services while meeting required standards and targets.
 - That Hamilton City Council needed to be able to plan (through LTP processes) infrastructure improvements to protect receiving waters, but that some contaminants were very difficult to control e.g., faecal contamination from birds and animals.
 - That consent terms and pathways for essential services needed to recognise time and cost of consents, and the need for certainty in getting reasonable consents.

27. All submissions made by Hamilton City Council can be accessed [here](#)

General Comments

General Support of Protecting Health and Wellbeing of People

28. Proposals outlined in the Consultation Document are aimed at improving the protection of drinking water sources and avoiding water supply contamination, including serious incidents such as occurred in Havelock North in 2016. The proposals seem reasonable, and Hamilton City Council supports measures to achieve a higher standard of protection for the City's and others' water supplies.

Roles and Responsibilities

29. The Consultation Document poses many detailed questions, some of which are more relevant to Regional Councils, and some which require specialist knowledge.
30. The Consent document requires Regional Councils and Territorial Authorities to apply the amended NES-DW requirements in their consenting processes and to update operational procedures to ensure the NES-DW is being applied to applicable consenting decisions and ensure proactive emergency response planning. It is not clear why Territorial Authorities are referenced here, when all significant earthworks, septic tanks and bore authorisations, water takes and discharges to receiving environments are regulated by the Regional Council.
31. In SWRMA 1 and SWRMA 2, there will be some existing activities lawfully occurring that **may no longer be permitted** e.g., discharges of contaminants; 'existing use rights' e.g., bores drilled and constructed many years ago. Consideration is being given to retrospectively applying the requirements of the NES-DW to those activities where effects on source water are ongoing and require addressing. It is important to note that only Regional Councils and Unitary Authorities can override existing use rights. District Councils do not have this power. Further commentary is provided in response to Consultation Document questions.

Potential Costs and Regulation Impact

32. According to 'Drinking Water Source Protection Zones, Delineation Methodology and Potential Impacts of National Implementation, Aqualinc, 2018', there are minimal existing Waikato Regional Plan rules to protect source water. This signals significant changes to Regional Plan rules.
33. The report also notes that the Waikato is assessed as having the highest potential impact under all scenarios of risk ranking, and mitigation cost ranking. This could have significant implications on resource users. It is not clear to Hamilton City Council the degree of changes that will be required in the Regional Plan to mitigate impacts and how that will impact activities. This may also create some uncertainty for future consenting and costs.
34. While costs are provided for delineation in the Consultation Report (\$1,000-\$5,000), it is not clear what the true implications will be on ratepayers of risk mitigation, and the significant work that will be needed to determine all delineations (including self-supply for more than one household), and consideration of the impact of some activities such as weed control. Hamilton City Council also seeks more clarity on any costs that may be passed onto Hamilton City Council for being within an upstream area delineated as SWRMA2.
35. Water suppliers may have reduced RMA costs associated with maintaining their abstraction point, as the NES-DW makes this more permissive. Hamilton City Council supports this proposal.
36. It is likely that compliance with the proposed regime will impose additional costs on Council, including the potential to require additional staff time inputs. This will need monitoring and where necessary, efficiencies sought.

Responsibilities Under Other Legislation

37. In the highest protection zone, SWRMA 1, Hamilton City Council will need to consider **if any activity is essential**, and if alternatives are available (including moving the location of the activity beyond SWRMA 1). In SWRMA 2, Hamilton City Council may have some activities **prohibited and or controlled** using non-complying or discretionary activity status where a consent option may be required.
38. It is important to recognise that Hamilton City Council (and other Territorial Authorities) provide essential services under the Local Government Act 2004, the Health Act 1956, and the Resource Management Act 1991. Hamilton City Council is also directed by the National Policy Statement to provide urban capacity, which subsequently requires infrastructure and services. It is important to provide a consenting pathway for such necessary services. Further commentary is provided in response to Consultation document questions.
39. Hamilton City sits in a high growth region and has obligations under the National Policy Statement for Urban Development and the Housing Supply Bill. Territorial Authorities with responsibilities to enable growth under this legislation may wish to have a role in determining delineation zones.
40. Hamilton City Council's activities need to be aligned with the Waikato River Settlement Act and Te Ture Whaimana o te Awa o Waikato (The Vision & Strategy) which seeks to both protect and restore the river and the relationship of iwi with the river. This Act needs to be recognised by all matters relating to three waters.

Proposals

PROPOSAL 1: HOW AT-RISK SOURCE WATER AREAS ARE DELINEATED

41. Hamilton City Council notes that this involves using a **default** methodology for delineating SWRMAs as a way to identify areas where activities have a higher likelihood of affecting source water. The methodology would map SWRMAs for different types of water bodies (rivers, lakes and aquifers), based on the time it takes for contaminants to travel to a source water intake and the level of filtration or mixing before reaching the intake.

Question 1 – Is this a Good Approach

42. Hamilton City Council agrees that standardised and better protection of drinking water sources is needed across Aotearoa and supports the proposed default methodology for delineating SWRMAs. This aligns with Te Mana o te Awa and Te Ture Whaimana o te Awa o Waikato, while protecting the health and safety of Hamilton's residents.
43. Hamilton City Council also supports that 'bespoke' delineation could be provided for, where appropriate. This would provide a customised response to environmental and cultural conditions where appropriate.

Question 2 – Is the Method the Best Option

44. It may be a challenge to delineate SWRMAs if environmental conditions change e.g., climate change or river margins that are affected by hydropower. A definition of river and lake edge will be important.

Question 4 – Will Differing Setbacks Cause Confusion

45. It is not clear to Hamilton City Council why a 5m extension into land for an SWRMA 1 area is recommended when the Technical Guidelines suggest that 30m should be applied where practical. To protect more than a 5m setback (e.g., 10m) may have other environment benefits while providing a buffer for changing conditions and allowing better for maintenance and inspection access.

46. Hamilton City Council is of the opinion that while there is risk of confusion between NES DW buffers and stock regulations, the purposes differ. Well written regulations and education will assist in providing the clarity needed.

Question 11 – Provision to Retain Existing Protection Zones

47. Hamilton City Council notes that there is likely to be new regulations to implement the NES-DW, therefore there will be efficiencies in revising new zones at the same time as regulations. This will better achieve the purpose of the review of this NES-DW regulations.

PROPOSAL 2: HOW ACTIVITIES THAT POSE RISKS TO SOURCE WATER ARE REGULATED OR MANAGED

48. The Consultation Document details how a SWMRA framework will work. This is noted as:
- For SWMRA 1 (close vicinity), delineation is: for rivers (and beds) this is 1,000m upstream and 100m downstream of the intake and 5m into land from the river edge, an entire lake and bed within 500m radius of the intake and 5m lake edge buffer, and 5m radius around groundwater abstraction point.
 - For SWMRA 2, restriction of activities for rivers in the time of travel of 8 hours to an intake point, for lakes it is the entire lake area extending landward 100m, and for aquifers where the groundwater travels to the intake bore within 1 year up to 2.5km.
49. The Consultation Document proposes **controlling** activities in the SWMRA 1 area, while enabling water suppliers to undertake intake management. Activities include drilling of bores and earthworks over vulnerable aquifers, uses of beds of lakes and rivers, placing restrictions on water, and discharges (excluding air). Activities must avoid or mitigate adverse effects.
50. The Consultation Document also proposes **restricting** high-risk activities in SWRMA 2. Highest-risk activities to source water are noted as direct discharges to water, and land disturbance over vulnerable aquifers, including the drilling of bores and earthworks. Consideration is being given to setting standards for bores.
51. Hamilton City Council notes that there are no additional restrictions proposed in SWMRA 3 as these will be managed under the RMA.

Question 12 – National Direction on Controlling Activities within an SWRMA 1

52. Hamilton City Council supports national direction for activities in high-risk areas, with the caveat that further thought needs to be given to responsibilities of Territorial Authorities under the National Policy Statement for Urban Development (NPS-UD) and central government direction on matters relating to infrastructure and transport strategies, carbon reduction emissions and climate change adaptation.
53. This means that services and infrastructure must be provided for forecasted growth, and in appropriate areas. Water takes, and wastewater and stormwater management may ultimately be needed in areas that are regulated by the NES-DW and Regional Plans.
54. Importantly, Hamilton City Council has also previously sought that those three waters networks are recognised as significant infrastructure and acknowledged as being necessary for the health and wellbeing of people.
55. It would be helpful if regulations could recognise the significance of three waters networks in regulations, and also provide for land designations (that have gone through due diligence in assessment impacts on ground and surface water including source water impacts). This may mean putting restraints on bores for individual house supply.

Question 13 – For Water Suppliers, other Activities beyond Intake Maintenance/Management

56. Hamilton City Council, in times of very low expected river levels, has needed to deploy a floating platform with additional pumps in order to abstract water and continue municipal supply. This activity goes beyond maintenance or management of fixed consented structures. Emergency activities should be provided for in the regulations.

Question 15 – National Direction on Activities within SWRMA 2

57. Hamilton City Council supports national direction on activities within SWRMA 2 with the same caveats described in points 52 to 55.

Question 16 and 19 – Impacts and Challenges

58. Proposed changes could cause additional increases in cost to ratepayers through regulatory plan changes to align with NES-DW direction. It could prevent certain activities and alternative options may be costly to executive. Assessment of environmental effects are likely to increase in complexity, time and cost.
59. Parts of the Consultation Document focus on protection of groundwater. Hamilton City Council prepares Three Waters Integrated Catchment Management Plans. However, these do not currently focus significantly on the effects on groundwater of activities within each catchment. This may have to change under the proposed changes to the NES-DW.
60. A neighbouring private property may be impacted by being in a SWRMA. It is unclear if and how much information is readily accessible for the supplier about existing land use activities and discharges if it's in another territorial authority, and potentially outside the scope of Regional Council regulation.

Question 24 – Territorial Authority Role in Land Management over Aquifers

61. The Consultation Document notes that Regional Councils are responsible for control of the use of land for the purpose of maintenance and enhancement of the quality of water in water bodies and asks if Territorial Authorities have a role in land management over aquifers.
62. Appropriate urban development should be the focus of Territorial Authorities rather than managing land over aquifers. Territorial Authorities do not hold information on bore locations, do not regulate significant earthworks and do not regulate ground water. Most groundwater bores will be within rural land. Regional Councils are best placed to manage consents, standards and impacts on aquifers.
63. The Consultation Document suggests that some existing activities lawfully occurring may no longer be permitted e.g., discharges of contaminants, have 'existing use rights' (bores), or have a consent with a long consent term that may not address current effects on source water.

Question 24 – Retrospective Application of the NES-DW to Existing Activities

64. Hamilton City Council does not support retrospective application of the NES-DW to existing activities unless it is known that the activity will have a detrimental impact on source water, or it falls within review time frames stated in resource consents. Hamilton City Council holds two significant discharge consents for wastewater and stormwater. Obtaining consents involves significant investment in planning, assessment of effects and capital expenditure over a long period of time. A further consideration is whether a downstream water supply has best available technology for treatment of contaminants.

Question 29 – Matters of Discretion

65. The Consultation Document notes that there is an opportunity to propose matters of discretion to all consent decisions. These matters are listed on page 33. Hamilton City Council agrees with the proposed list and recommends adding matters relating to the significance of any proposed infrastructure and service.

Questions 30, 31 – Proactive Response Planning

66. The Consultation Document proposes a requirement that a risk management/emergency response plan is prepared for certain activities. The types of activities that might pose a risk include anything that could significantly disrupt wastewater treatment processes, or anything that could cause a significant chemical spill.

- 67. Hamilton City Council thinks that it is reasonable to require high risk activities to undertake emergency response planning. Hamilton City Council also supports the exemption of a separate plan where an existing plan would meet requirements. Hamilton City Council already supports this through wastewater treatment plant contingency planning, and for various industries subject to the Hamilton City Council Stormwater Bylaw.
- 68. Contingency planning is required under the Regional Council's wastewater discharge consent.
- 69. The trigger for a 'pollution control plan' under the Bylaw is whether the Regional Council has determined that the industry is high risk. These plans, required by the Bylaw (prepared under the Local Government Act and Health Act), to prevent damage or misuse of the network have content that would manage source water contamination. Hamilton City Council considers that such Plans, should still constitute meeting the provisions of an amended NES-DW.
- 70. The City's high-risk facility operators are not required to have their plan reviewed by a suitably qualified professional under the Bylaw. Hamilton City Council does not have an opinion on whether these plans should be approved by a qualified professional but notes that this may place an unnecessary cost burden on some small businesses. In this regard a higher risk (likelihood and consequence) model may be the better option, noting that a risk assessment will also come with resourcing costs.

Question 32 and 33 – Water Supplier Involvement

- 71. The Consultation Document proposes to allow consent applicants to avoid notification of their application if they get written approval from the water supplier for the proposed activity. Consent applications for SWRMA 1 and 2 may still be subject to public or limited notification for other reasons.
- 72. While the intent of the proposal appears to have benefit to the application, a water supplier would need to have sufficient expertise to understand many environmental factors such as river hydrology, assimilation capacity, cumulative effects, time of travel, mixing behavior and geotechnology in order to understand possible risks and whether approval should be given. A Local Authority may also be put under pressure by an applicant to approve a proposal. This does not seem reasonable to Hamilton City Council and is not supported.

Questions 37 and 38 – General Matters Relating to Managing Source Water Risks

- 73. Hamilton City Council notes that in SWRMA 1, resource users should consider if any activity is essential, and if alternatives are available (including moving the location of the activity beyond SWRMA 1). Consideration is being given to prohibiting certain activities and using non-complying or discretionary activity status where a consent option may be required in SWRMA 1.
- 74. Hamilton City Council, as an existing water supplier, may potentially be benefited by upstream management of contaminants, noting that Hamilton City Council has already been party to a resource consent application and negotiated that the applicant provides a spill management plan and notification protocols.
- 75. Hamilton City Council, as a discharger to the Waikato River is already required by conditions of its resource consents, to avoid, remedy and mitigate the effects of its discharges to the receiving environment. There may be implications for amending and implementing stormwater and wastewater related Bylaws.

PROPOSAL 3: PROTECTING ALL REGISTERED WATER SUPPLIES

- 76. Hamilton City Council notes that Ministry for the Environment propose to expand the NES-DW to cover the same supplies as the Water Services Act (WSA), being **all** water suppliers other than domestic self-suppliers.

77. Hamilton City Council notes that Regional Councils would be required to map SWRMA for all currently registered water supplies by November 2022, and that maps would need to be in new freshwater plans by 2024 in conjunction with new controls. Any unregistered supplies must be registered by November 2025, and mapping is likely to take until late 2027 before controls can be applied.

Question 39, 40 – Application of the NES-DW to all Registered Supplies

78. Hamilton City Council considers that aligning application of the NES-DW with the Water Services Act is the best approach for regulating activities and protecting source water. This will assist water suppliers and resource users to understand what their roles and responsibilities are.
79. Challenges resulting from including newly registered supplies within the NES-DW framework is that it will take some time to carry out mapping and determining appropriate controls, but some very small supplies may become disestablished with urbanisation. This may mean that unnecessary controls may have been applied for new resource users.

IMPACTS OF AMENDING THE NES-DW

80. Table 3 in the Consultation Document states that for any relevant land use restrictions, or other activities where proactive emergency response planning should be applied, Territorial Authorities (Hamilton City Council) must update operational procedures to ensure the NES-DW is being applied to applicable consenting decisions, and associated information and education of resource users.
81. As the Regional Council is the key regulator, it is not clear to Hamilton City Council the operational procedures that would need to be updated. There are possible implications for high-risk activities that discharge stormwater to the Council's network, as discussed in point 75. Hamilton City Council seeks further guidance on this matter.

Further Information and Opportunity to Discuss Our Submission

82. Should the Ministry for the Environment require clarification of the submission from Hamilton City Council, or additional information, please contact **Rae Simpson** (Senior Planner - City Waters) on 07 838 6427, email raewyn.simpson@hcc.govt.nz in the first instance.
83. Hamilton City Council would welcome the opportunity to discuss the content of our submission with the Ministry for the Environment in more detail.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

APPENDIX 1
SUBMISSIONS MADE BY HAMILTON CITY COUNCIL IN THE THREE WATERS SPACE
FEBRUARY 2007 - DECEMBER 2021

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT	DOWNLOAD SUBMISSION
		COUNCIL	STAFF		
Three Waters Reform	The Working Group on Representation, Governance and Accountability of new Water Service Entities	✓		4/02/22	Download Now
Economic Regulation and Consumer Protection for Three Waters Services in New Zealand (27 October 2021 Discussion Paper)	Ministry of Business, Innovation and Employment	✓		16/12/21	Download Now
Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill. <i>NB: this is a joint submission made on behalf of Hamilton City Council and the Future Proof Partners (i.e., Hamilton City Council; Waikato District Council; Waipā District Council; Waikato Regional Council; and Waikato Tainui)</i>	Parliament's Environment Select Committee	✓		16/11/21	Download Now
Managing our Wetlands - A Discussion Document on Proposed Changes to the Wetlands Regulations	Ministry for the Environment		✓	27/10/21	Download Now
Three Waters Reform Formal Feedback to Government: A) Cover letter to Minister of Local Government B) Formal feedback to Government	Hon Nanaia Mahuta (Minister of Local Government); LGNZ; Department of Internal Affairs	✓		1/10/21	Download A) Download B)
Proposed Cost Recovery Fees and Charges Under Water Services Bill Regulations	Department of Internal Affairs		✓	20/08/21	Download Now
Inquiry on the Parliamentary Paper on the Exposure Draft - Natural and Built Environments Bill	Parliament's Environment Committee	✓		4/08/21	Download Now
Government Policy Statement on Housing and Urban Development (GPS-HUD) - June 2021 Discussion Document	Ministry of Housing and Urban Development	✓		3/08/21	Download Now Download Now
Waikato District Council's Review of the Water Supply Bylaw 2014	Waikato District Council		✓	15/07/21	Download Now
Waikato District Council's Proposed Stormwater Bylaw 2021	Waikato District Council		✓	15/07/21	Download Now
Review of Waipa District Council's Trade Waste Bylaw (2011) and Wastewater Drainage Bylaw (2011)	Waipa District Council		✓	5/07/21	Download Now
Infrastructure for a Better Future: Aotearoa New Zealand Infrastructure Strategy (May 2021 Consultation Document)	New Zealand Infrastructure Commission	✓		2/07/21	Download Now
Inquiry into Supplementary Order Paper No. 38 on the Health (Fluoridation of Drinking Water) Amendment Bill	Parliament's Health Committee		✓	18/06/21	Download Now

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT	DOWNLOAD SUBMISSION
		COUNCIL	STAFF		
Government Three Waters Reform: Hamilton City Council Feedback to LGNZ	Local Government New Zealand	✓		10/06/21	Download Now
Early Engagement on Resource Management Reform - Opportunities to Improve System Efficiency	Ministry for the Environment		✓	21/05/21	Download Now
Watercare Waikato River Take Application	Environmental Protection Authority	✓		26/03/21	Download Now
Water Services Bill	Parliament's Health Committee	✓		26/02/21	Download Now
APP139736 - Fonterra Cooperative Group Limited - Hautapu Site - Resource Consent Applications	Waikato Regional Council		✓	31/07/20	Download Now
Appeal Against Decisions of the Waikato Regional Council on Proposed Plan Change 1 to the Waikato Regional Plan	Waikato Regional Council	✓		7/07/20	Download Now
Infrastructure Funding and Financing Bill	Parliament's Transport and Infrastructure Committee	✓		13/03/20	Download Now
Proposed National Policy Statement for Indigenous Biodiversity	Ministry for the Environment	✓		5/03/20	Download Now
Taumata Arowai - The Water Services Regulator Bill	Parliament's Health Committee	✓		28/02/20	Download Now
Urban Development Bill	Parliament's Environment Committee	✓		13/02/20	Download Now
Transforming the Resource Management System: Opportunities for Change: Issues and Options Paper (November 2019)	Ministry for the Environment	✓		10/02/20	Download Now
Draft Growth and Economic Development Strategy - Waikato 2070	Waikato District Council	✓		24/01/20	Download Now
Cambridge Wastewater Treatment Plant Discharge Consent Application - Waipa District Council (APP141113)	Waikato Regional Council	✓		19/12/19	Download Now
Hamilton City Council Statement of Evidence for 19/10/20 Hearing: Cambridge Wastewater Treatment Plant Discharge Consent Application - Waipa District Council (APP141113)	Waikato Regional Council	✓		19/10/20	Download Now
Action for Healthy Waterways: A Discussion Document on National Direction for Our Essential Freshwater	Ministry for the Environment	✓		31/10/19	Download Now
Infrastructure Funding and Financing Information Paper – Development Contributions and Targeted Rates	Department of Internal Affairs		✓	25/10/19	Download Now
Discussion Document on a Proposed National Policy Statement for Highly Productive Land	Ministry for Primary Industries/Ministry for the Environment	✓		17/10/19	Download Now
Discussion Document on a Proposed National Policy Statement on Urban Development	Ministry for the Environment	✓		17/10/19	Download Now
Draft Report on Local Government Funding and Financing	New Zealand Productivity Commission	✓		13/09/19	Download Now

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Further Submissions on the Submissions to the 2018 Waikato Proposed District Plan (Stage 1)	Waikato District Council	✓		15/07/19	Download Now
Waipa District Council's Proposed Stormwater Bylaw 2019	Waipa District Council		✓	21/06/19	Download Now
New Zealand Infrastructure Commission/Te Waihanga Bill	Parliament's Finance and Expenditure Committee		✓	17/05/19	Download Now
Local Government Funding and Financing Inquiry	New Zealand Productivity Commission	✓		15/03/19	Download Now
Formation of a New Independent Infrastructure Body (October 2018 Consultation Document)	Treasury		✓	26/10/18	Download Now
Three Waters Review	Minister for Local Government	✓		23/10/18	Download Now
Proposed District Plan	Waikato District Council	✓		9/10/18	Download Now
LGNZ Three Waters Survey	Local Government New Zealand	✓		20/09/18	Download Now
Further Submissions to the Healthy Rivers Plan Change: Proposed Plan Change 1 and Variation 1	Waikato Regional Council	✓		17/09/18	Download Now
Draft National Planning Standards Consultation Document	Ministry for the Environment		✓	14/08/18	Download Now
Application for Resource Consents (APP137797) by Fonterra Limited for the Continued Operation of the Te Rapa Milk Processing Site, Waikato Region	Waikato Regional Council	✓		3/07/18	Download Now
Waikato Regional Council's Draft 2018-2028 Long Term Plan	Waikato Regional Council	✓		20/04/18	Download Now
Hamilton City Operative District Plan October 2017 Proposed Plan Change 2 - Te Awa Lakes Private Plan Change	Hamilton City Council	✓		29/11/17	Download Now
Regional Infrastructure Technical Specifications	Waikato Local Authority Shared Services		✓	02/10/17	Download Now
Clean Water: 90% of Rivers and Lakes Swimmable by 2040	Ministry for the Environment	✓		05/05/17	Download Now
Proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments	Waikato Regional Council	✓		02/03/17	Download Now
The Health (Fluoridation of Drinking Water) Amendment Bill	Parliament's Health Committee	✓		09/02/17	Download Now
Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments (Waikato Healthy Rivers Wai Ora Project)	Waikato Regional Council	✓		23/08/16	Download Now
Local Government Act 2002 Amendment Bill (No 2)	Parliament's Local Government and Environment Committee	✓		5/08/16	Download Now

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Late Submission to the Ruakura Variation to Hamilton City's Proposed District Plan	Hamilton City Council	✓		6/07/16	Download Now
Alteration of Designation - Resolution Drive Extension and Horsham Downs Link Road	Waikato District Council	✓		5/05/16	Download Now
'Next Steps for Freshwater' Consultation Document (February 2016)	Ministry for the Environment	✓		29/04/16	Download Now
Waikato Regional Council's 2016-17 Proposed Annual Plan Consultation Document	Waikato Regional Council	✓		5/04/16	Download Now
Final Position Paper 'Improving New Zealand's Water and Wastewater and Stormwater Sector'	Local Government New Zealand	✓		30/10/15	Download Now
Notice of Requirement: Designation by NZ Transport Agency - State Highway 26/Ruakura Road/Lisette Road Roundabout	Waikato District Council	✓		4/09/15	Download Now
17 June 2015 Draft Report 'Using Land for Housing'	New Zealand Productivity Commission	✓		4/08/15	Download Now
Draft Waikato District Development Strategy (May 2015)	Waikato District Council		✓	16/07/15	Download Now
Water Legislation Reform Discussion Paper	Water New Zealand		✓	22/04/15	Download Now
Draft Implementation Guide for the National Policy Statement for Freshwater Management 2014	Ministry for the Environment		✓	3/12/14	Download Now
NZTA's Notices of Requirement to Alter Existing Designations for the Waikato Expressway (Hamilton Section) to Accommodate Ruakura Interchange and Connecting Roads	Rice Resources Ltd	✓		22/10/14	Download Now
Further Amendments to the National Policy Statement for Freshwater Management 2014	Ministry for the Environment		✓	11/09/14	Download Now
Draft Waikato District Council Water Supply Bylaw 2014	Waikato District Council		✓	23/05/14	Download Now
Proposed Auckland Unitary Plan	Auckland Council	✓		28/02/14	Download Now
Proposed Amendments to the National Policy Statement for Freshwater Management 2011: A Discussion Document	Ministry for the Environment		✓	4/02/14	Download Now
Waipa District Council's Proposed Water Supply Bylaw 2013	Waipa District Council	✓		12/07/13	Download Now
Waikato-Tainui Environmental Plan (Latest Draft)	Waikato-Tainui	✓		24/06/13	Download Now
Housing Accords and Special Housing Areas Bill	Social Services Select Committee	✓		30/05/13	Download Now
Waikato Regional Council's Draft 2013/14 Annual Plan	Waikato Regional Council	✓		17/04/13	Download Now
Freshwater Reform 2013 and Beyond	Ministry for the Environment	✓		8/04/13	Download Now

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Improving our Resource Management System	Ministry for the Environment	✓		2/04/13	Download Now
Hamilton City's Proposed District Plan	Hamilton City Council	✓		28/03/13	Download Now
Development Contributions Review Discussion Paper (February 2013)	Department of Internal Affairs	✓		22/03/13	Download Now
Draft Waikato Conservation Management Strategy 2014-2024	Department of Conservation	✓		15/03/13	Download Now
Environmental Management Plan for Waikato-Tainui (Working Draft Discussion Document)	Waikato-Tainui		✓	04/03/13	Download Now
Consultation on Local Government Mandatory Performance Measures	Department of Internal Affairs		✓	28/02/13	Download Now
Draft Waikato Regional Council Navigation Safety Bylaw 2013	Waikato Regional Council		✓	23/02/13	Download Now
Plan Change 3 – Tamahere Structure Plan	Waikato District Council	✓		28/08/12	Download Now
Waikato District Council's Draft 2012-22 Long Term Plan; Waikato District's Draft Waste Management and Minimisation Plan 2012	Waikato District Council	✓		9/05/12	Download Now
Waikato Regional Council's Draft 2012-2022 Long Term Plan	Waikato Regional Council	✓		1/05/12	Download Now
Draft Auckland Plan	Auckland Council	✓		31/10/11	Download Now
Waikato Regional Council's Proposed Regional Policy Statement - Further Submission	Waikato Regional Council	✓		15/07/11	Download Now
Auckland Spatial Plan Discussion Document ('Auckland Unleashed')	Auckland City Council	✓		30/05/11	Download Now
Waikato Regional Council's Draft 2011/2012 Annual Plan	Waikato Regional Council	✓		26/04/11	Download Now
Waipa District Council's Draft 2011/2012 Annual Plan	Waipa District Council	✓		15/04/11	Download Now
Environment Waikato's Proposed Regional Policy Statement	Waikato Regional Council	✓		28/02/11	Download Now
Building Competitive Cities: Reform of the Urban and Infrastructure Planning System	Ministry for the Environment	✓		17/12/10	Download Now
Local Government Act (LGA) 2002 Amendment Bill	Local Government and Environment Select Committee	✓		18/06/10	Download now
Local Government Act (LGA) 2002 Amendment Bill – SOLGM's Draft submission	Society of Local Government Managers (SOLGM)	✓		11/06/10	Download now
Waipa District Council Draft 2010/11 Annual Plan	Waipa District Council	✓		19/04/10	Download now
Regional Policy Statement Review - Working Draft	Environment Waikato	✓		26/02/10	Download now
Waikato-Tainui Ruapatu Claims (Waikato River) Settlement Bill	Maori Affairs Select Committee	✓		19/02/10	Download now
Proposed Private Plan Change No.67 - Meridian 37 Ltd	Waipa District Council	✓		29/01/10	Download now
Waipa Draft Environment Strategy	Waipa District Council	✓		24/11/09	Download now

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Waste Minimisation Discussion Document	Ministry for the Environment	✓		19/05/09	Download now
Environment Waikato's Regional Policy Statement Review	Environment Waikato	✓		8/05/09	Download now
Environment Waikato's Draft 2009-19 LTCCP	Environment Waikato	✓		20/04/09	Download now
Resource Consent Application from Fonterra re Wastewater Discharge	Waikato Regional Council	✓		18/03/09	Download now
Waikato-Tainui Raupatu Claims (Waikato River) Settlement Bill	Maori Affairs Select Committee	✓		13/02/09	Download now
National Policy Statement (NPS) for Freshwater Management	National Policy Statement (NPS) for Freshwater Management	✓		23/01/09	Download now
National Environmental Standard on Ecological Flows and Water Levels	Ministry for the Environment	✓		29/08/08	Download now
Waikato District Council - Southern Districts Water Supply	Environment Waikato	✓		30/07/08	Download now
Proposed Vision for the Waikato River	Guardians Establishment Committee	✓		23/05/08	Download now
Waste Minimisation (Solids) Bill	Local Government and Environment Select Committee	✓		2/11/07	Download now

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