

## Janel Hau

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**From:** GRACE EMILY, MRS <EMILY.GRACE@nzdf.mil.nz>  
**Sent:** Friday, 21 March 2014 4:42 p.m.  
**To:** Mailroom Mailbox  
**Cc:** OWEN ROB, MR  
**Subject:** TRIM: Submission on Variation 1 to the Proposed Land and Water Plan (unclassified)  
**Attachments:** NZDF V1 Submission.pdf

**Categories:** Purple Category  
**HP TRIM Record Number:** C14C/44131

Hi,

Please find attached a submission by the New Zealand Defence Force on Variation 1.

Regards  
Emily

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## Submission on Proposed Variation 1 Proposed Canterbury Land and Water Regional Plan

Clause 6 of First Schedule, Resource Management Act 1991

**To:** Environment Canterbury  
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### Preliminary Matters

This is a submission on Variation 1 to the Proposed Canterbury Land and Water Regional Plan.

New Zealand Defence Force (NZDF) **could not** gain an advantage in trade competition through this submission.

This submission relates to provisions in Variation 1 relating to community water supplies.

NZDF wishes **to be heard** in support of this submission.

If others make a similar submission, **we will consider** presenting a joint case with them at the hearing.

### Submission Point 1: Community Water Supply

**Plan provision:** Statement under the heading “Small and Community Water Takes” on page 4-16 and Rule 11.5.32

NZDF **supports** these provisions **in part**.

#### **Relief sought:**

Retain the priority given to takes for community water supplies within the Selwyn-Waihora catchment, including the exception from compliance with allocation limits. In particular:

- a. Retain the statement under the heading "Small and Community Water Takes" on page 4-16, which states that Regional Rule 5.115 applies in the Selwyn-Waihora catchment.
- b. Insert a statement into Rule 11.5.32 to clarify that the rule does not apply to takes for community water supplies.

**Reasons:**

NZDF supports the priority given to takes for community water supply as this is reasonable and consistent with the objectives and policies of the Land and Water Plan and Regional Policy Statement.

In particular, NZDF considers it appropriate for region-wide rule 5.115 to address water takes for community water supply with the Selwyn-Waihora catchment as this ensure such a take is treated in the same manner as in other catchments, achieving consistency across the Region.

Section 11.7.2 Ground and Surface Water Allocation Limits of Variation 1 states that these limits do not apply to group or community drinking water supplies. NZDF supports this outcome, as it affords priority to takes for community water supply. However, to be clearer and more effective, this exception should be provided for up-front in Rule 11.5.32, rather than in section 11.7.2 where it is somewhat obscured. Rule 11.5.32 is the generic rule for water takes. Explicitly excluding this rule from applying to takes for community water supply would also remove a potential ambiguity caused by Rule 5.115 and 11.5.32 theoretically both applying to takes for community water supplies.



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Person authorised to sign  
on behalf of New Zealand Defence Force

21 March 2014