From:
 Sarah Bevin

 To:
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 DAVIES REBECCA

Subject: Submission on Plan Change 5 from NZDF Date: Submission on Plan Change 5 from NZDF Priday, 11 March 2016 4:55:31 p.m.

Attachments: <u>image001.png</u>

image002.png

Submission on Plan Change 5 LWRP NZDF 11 March 16.pdf

Hello

Please find attached a submission from the New Zealand Defence Force on Plan Change 5 on the Land and Water Plan.

Kind regards,
Sarah Bevin
on behalf of the Defence Force

Sarah Bevin | Resource Management Planner

BRS

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Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

Clause 6 of First Schedule, Resource Management Act 1991

To: Plan Change 5 to LWRP

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INTRODUCTION

The New Zealand Defence Force (NZDF) has military interests throughout New Zealand. Defence facilities are key strategic infrastructure of national and regional importance, playing a significant role in both military training and civil and/or national defence operations. These facilities also play an important role in supporting search and rescue operations and infrastructure support capabilities (for example deployment of water purification and supply facilities as used in the aftermath of the Christchurch earthquakes).

This submission addresses provisions in Plan Change 5 (Nutrient Management and Waitaki Plan Change) that relate to NZDF assets, facilities and activities within the Canterbury region, including the Burnham and Tekapo Military Camps.

The Burnham and Tekapo Military Camps are of strategic importance both nationally and internationally. They are identified as strategic and regionally significant infrastructure within the Canterbury Regional Policy Statement 2013 and their continued operation is essential to ensure NZDF can achieve its obligations under the Defence Act 1990.

NZDF's submission on the Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan is set out below.

PRELIMINARY MATTERS

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

NZDF wishes to be heard in support of this submission.

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

SUBMISSION POINT 1

Plan provision: Various provisions relating to nutrient management practices as they manage water quality.

NZDF **supports** these provisions.

Relief sought: Retain the provisions as notified.

Reasons: NZDF holds resource consents to take groundwater at the Burnham Military Camp for various uses, including for drinking water. Elevated nitrate levels have been recorded at these bores, which is of concern to NZDF. Therefore NZDF supports the appropriate management of land use activities to protect water quality for existing and future users.

NZDF supports the overall intent of Plan Change 5, which aims to improve the nutrient management framework through good management practice requirements, including Farm Environment Plan auditing. The management of land practices is considered fundamental to maintaining water quality in Canterbury.

NZDF supports the inclusion of provisions which specifically aim to achieve water quality outcomes to protect existing and future groundwater users, through management of land practices, including farming. These provisions include (but are not limited to) Policies 4.36, 4.37 and 4.38 which aim to manage and improve freshwater quality through appropriate nutrient management practices.

Date 11 Mar 2016

Rob Owen, Environment Manager on behalf of New Zealand Defence Force