From:
 Sarah Bevin

 To:
 Mailroom Mailbox

 Cc:
 Davies Rebecca, Ms

Subject: Submission on Plan Change 7 to the Canterbury Land and Water Plan

Date: Friday, 13 September 2019 11:59:45 AM

Attachments: image001.png

image002.png IMG360blue_png.png

190913 NZDF submission PC 7&2.pdf

Hello

Please find attached a submission from the New Zealand Defence Force on Plan Change 7 to the Canterbury Land and Water Plan.

Regards

Sarah Bevin

On behalf of the New Zealand Defence Force

Nga Mihi | Kind regards

Sarah Bevin | Senior Planner

BRS, MNZPI

Tonkin + Taylor - Exceptional thinking together

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Date: 13/09/2019



Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

Clause 6 of First Schedule, Resource Management Act 1991

To: Proposed Plan Change 7 to the Land and Water Regional Plan

Address: Environment Canterbury

PO Box 345

Christchurch 8140

Email: mailroom@ecan.govt.nz

Submitter: New Zealand Defence Force

Contact Person: Rebecca Davies, Senior Environmental Officer

Address for Service: New Zealand Defence Force

C/- Tonkin + Taylor PO Box 2083 Wellington 6140

Attention: Sarah Bevin

Phone: +64 21 445 482

Email: rebecca.davies@nzdf.mil.nz / sbevin@tonkintaylor.co.nz

Preliminary Matters

A detailed submission is attached.

The New Zealand Defence Force (NZDF) has military interests throughout New Zealand. Within the Canterbury region, NZDF currently owns and operates a number of facilities, including the Burnham Military Camp, West Melton Rifle Range, Glentunnel Ammunition Storage Depot and Weedons Depot and Communication site. NZDF may also undertake temporary military training activities in various areas within the Canterbury region.

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.

Person authorised to sign on behalf of New Zealand Defence Force

Point	Provision	Support/ Oppose	Reasons	Relief Sought
1	Rule 5.140 Temporary structures Condition 5	Oppose	The proposed additional permitted activity condition 5 is considered unnecessary as proposed conditions 3 and 4 appear to seek the same objectives as condition 5. Noting these provisions provide for temporary activities, NZDF considers that existing conditions 1 and 2 and proposed conditions 3, 4 and 6 sufficiently manage the potential effects of the activity.	Delete proposed additional condition 5.
2	Rule 5.141 Temporary discharges Condition 3	Oppose	The existing provision is considered appropriate for temporary discharges, as the duration of the discharge is limited both within 24 hours, and over a month. Given the specific attributes of temporary activities (and associated discharges) these existing provisions are appropriate and imposing specific total suspended solids limits (which would require monitoring to confirm the limits are met and the activity is in fact permitted) is considered excessive in relation to these activities.	Retain the operative version condition 3 of Rule 5.141.