

28 September 2009

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Robyn				RA
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Dear Robyn

Proposed One Plan – Evidence for the Water Topics Hearing from the Ministry of Education

The Ministry of Education has reviewed the Council Officer's Report and wishes to table the following evidence to the Hearings Panel at the Water Topics Hearing:

Policy 6-19 – Essential takes

The Planning Officer's report recommends retention of 'schools or other educational facilities' as essential facilities for water allocation. The Ministry's Submission and Further Submission supported this approach. It is important that essential facility water allocation takes are maintained regardless of other low river flow restrictions. The Ministry supports this policy in as much as it ensures security of supply for schools and other educational facilities.

However, the Ministry would like to see a clear hierarchy identified between essential facilities within the policy. The Ministry accepts that hospitals and other facilities providing medical treatment should be allocated water as a top priority and thus should be ranked first and second on a hierarchy of essential facilities. The Ministry considers that 'schools and other educational facilities' should be ranked as the next most essential facilities after hospitals and other facilities providing medical treatment.

The Ministry considers this is the correct hierarchy order for essential facilities because any reduction or halting of water supply to schools or other educational facilities would cause significant inconvenience to students and the wider community, as schools would be required to close for the duration of water restriction periods, to protect the health and safety of students.

Requested amendment:

- The Ministry of Education requests that a hierarchy between essential facilities be established which ranks only hospitals and other facilities providing medical treatment as a higher priority than schools or educational facilities.

Policy 6-11 and Rule 13-10 – Discharges to land and water

The Ministry's submission, sought clarification about how Council would assess discharge consent applications for large school sites or where existing school sites have insufficient land available for onsite disposal. The Planning Officer's report does not directly provide clarification on these matters.

The Ministry notes however, that the Planning Officer recommends that Policy 6-11 be amended to include the words "...or alternative system to mitigate the effects on the mauri of the receiving surface water body". The Ministry notes this change recognises the potential costs and land acquisition issues landowners may face, complying with a land based only discharge solution. In this respect the Planning Officer's recommendation goes some way to addressing the concerns of the Ministry.

The Planning Officer acknowledges in her Report, the need to consider the issues specific to large schools (schools with discharges greater than 2000 litres/day). The Ministry wishes to convey its preference that this matter be addressed specifically in the Supplementary Report. The Ministry requests that it be given an opportunity to review the Supplementary Report prior to the Hearing.

Requested amendment:

- The Ministry of Education Ministry wishes to record its support for the recommended change to Policy 6-11 to allow for other discharge solutions.
- The Ministry wishes to convey its preference that discharge solutions for schools with discharges greater than 2000 litres/day be addressed specifically in a Supplementary Report.
- The Ministry requests that it be given an opportunity to review the Supplementary Report prior to the Hearing.

Should the Hearing Panel have any further questions or seek further clarification on any matters raised in this letter, please feel free to contact me directly on (06) 349 6608.

Yours sincerely



Brenda O'Shaughnessy
Opus International Consultants Ltd
On behalf of the Ministry of Education