

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of Hearing Streams 18  
Stage 3 and 3b  
Proposed District Plan

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**REPLY OF ELIZABETH JANE SIMPSON  
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**PLANNING - FIREFIGHTING WATER SUPPLY AND ACCESS IN:**

**CHAPTER 21 RURAL  
CHAPTER 22 RURAL RESIDENTIAL AND RURAL LIFESTYLE  
CHAPTER 23 GIBBSTON CHARACTER ZONE  
CHAPTER 24 WAKATIPU BASIN  
CHAPTER 38 OPEN SPACE AND RECREATION**

**4 September 2020**

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## 1. INTRODUCTION

1.1 My name is Elizabeth Jane Simpson. I prepared the section 42A report<sup>1</sup> (**s42A**) for the firefighting water supply and access variation, filed in Hearing Stream 18. My qualifications and experience are set out in my s42A.

1.2 I attended the hearing on Friday 3 July 2020 and have been provided information from submitters and counsel at the hearing, including reports of what has taken place at the hearing where relevant to my evidence.

1.3 This reply evidence covers the following issue:

(a) Whether the use of the word 'maintained' in Rules 21.7.5.1, 22.5.13.1, 23.5.9.1, 24.5.19.a and 38.10.11.1 (**Rules**) creates ambiguity and should be replaced with alternative wording.

1.4 The summary of my submissions remains the same as Appendix 2 of my s42A report.

1.5 The following are attached to my reply evidence:

(a) **Appendix A:** Recommended revised variations;

## 2. 'MAINTAINED WATER SUPPLY' IN RULES 21.7.5.1, 22.5.13.1, 23.5.9.1, 24.5.19.a AND 38.10.11.1

2.1 The Panel questioned the use of the word '*maintained*' in the Rules which require "A *maintained* water supply of 45,000 litres..." In particular, the Panel queried whether the use of the word 'maintained' creates ambiguity and might be better replaced with the word 'continuous' – that is, a *continuous* water supply.

2.2 After considering both options, it is my view that 'maintained' is more appropriate than 'continuous', as this best represents a protected, preserved and static water supply. A 'continuous' water supply could

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<sup>1</sup> Dated 18 March 2020.

imply having a steady and uninterrupted available supply but not necessarily preserved or static.

- 2.3** However, I acknowledge the way in which the sentence is currently structured could result in various interpretations– for example, it could be interpreted as meaning the *quantity* of water supply should be continuously maintained or alternatively, that the water *quality* should be maintained. It is not intended that the Rules relates to water quality.
- 2.4** The purpose of the Rules is to ensure that in the event of a fire, there would be 45,000L of water readily available to be utilised. This requires that the 45,000L should be immediately available. It should not be misinterpreted as being able to achieve, source or pump 45,000L from a source over time, instead the water supply reserve should be available on demand.
- 2.5** While there is no scope available from a submission to make these changes, I consider the change can be made via Clause 16(2), Schedule 1 RMA. The alteration is purely grammatical in nature, and in my view, of minor effect. I therefore recommend that Rules be amended as set out in Appendix **A**.

A handwritten signature in black ink, enclosed in a hand-drawn oval. The signature appears to read 'E. J. Simpson' in a cursive style.

**Elizabeth Jane Simpson**

**4 September 2020**

**APPENDIX A**  
**RECOMMENDED REVISED VARIATION**

**KEY:**

Purple underline and ~~strike through~~ text are recommended amendments made in my Reply 04/09/2020.

Red underline and ~~strike through~~ text are recommended amendments made in section 42A report, 18/03/2.

Any black underlined or ~~strike through~~ text, reflect notified variations.

Chapter	Rule	Original Notified Version: Black text and <u>Underlined</u> text for additions and <del>strike through</del> text for deletions.	Recommended changes: Red text and <u>Underlined</u> text for additions and <del>strike through</del> text for deletions.	<u>Purple underline</u> and <del>strike through</del> text are recommended amendments made in Reply 04/09/2020.
21 – Rural Zone	21.7.5.1	A <u>maintained</u> water supply of 45,000 litres and any necessary couplings (excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s)	A <u>maintained</u> water supply of 45,000 litres and any necessary couplings (excluding potable <u>storage</u> volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and <u>any necessary couplings</u> .	A <u>maintained</u> water supply of 45,000 litres and any necessary couplings <u>shall be maintained at all times</u> (excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and any necessary couplings.
22 – Rural Residential and Rural Lifestyle Zones	22.5.13.1	A <u>maintained</u> water supply of <u>at least 20</u> 45,000 litres (excluding potable storage volume requirements for domestic use) with an	A <u>maintained</u> water supply of <u>at least 20</u> 45,000 litres (excluding potable <u>storage</u> volume requirements for domestic use) with an outlet connection point	A <u>maintained</u> water supply of 45,000 litres and any necessary couplings <u>shall be maintained at all times</u>

		outlet connection point that can provide 1500L/min (25 L/s) and any necessary couplings	that can provide 1500L/min (25 L/s) and any necessary couplings and any necessary couplings.	(excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and any necessary couplings.
23 – Gibbston Character Zone	23.5.9.1	A maintained water supply of at least 45,000 litres (excluding potable volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s).	A maintained water supply of at least 45,000 litres (excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and any necessary couplings.	A maintained water supply of 45,000 litres and any necessary couplings shall be maintained at all times (excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and any necessary couplings.
24 – Wakatipu Basin Zone	24.5.19.a	A maintained water supply of at least 4520,000 litres (excluding potable volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and any necessary couplings;	A maintained water supply of at least 4520,000 litres (excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and any necessary couplings and any necessary couplings;	A maintained water supply of 45,000 litres and any necessary couplings shall be maintained at all times (excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and

				<u>any necessary couplings.</u>
38 – Gibston Character Zone	38.10.11. 1	A <u>maintained</u> water supply of 45,000 <u>(excluding potable storage volume requirements for domestic use)</u> with an outlet connection point that can provide 1500L/min (25 L/s); <del>and</del>	A <u>maintained</u> water supply of 45,000 <u>(excluding potable storage volume requirements for domestic use)</u> with an outlet connection point that can provide 1500L/min (25 L/s) <del>and any necessary couplings.</del> <del>;</del> and	A <u>maintained</u> water supply of 45,000 litres <del>and any necessary couplings</del> <u>shall be maintained at all times</u> (excluding potable storage volume requirements for domestic use) with an outlet connection point that can provide 1500L/min (25 L/s) and <u>any necessary couplings.</u>

