

Further Submission on the Proposed New Plymouth District Plan

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This is a further submission on the Proposed New Plymouth District Plan (Proposed Plan). NZDF also provided feedback on the Draft Proposed Plan in March 2018 and made a primary submission on the Proposed Plan in November 2019.

The New Zealand Defence Force (NZDF) represents a relevant aspect of the public interest¹, and also has an interest in the Proposed Plan that is greater than the interest that the general public has.

NZDF has military interests throughout New Zealand. While NZDF does not currently have facilities within the New Plymouth district, this does not preclude the potential for NZDF to need facilities in this district at some point in the future.

NZDF may also undertake temporary military training activities (TMTA) in the New Plymouth district. NZDF undertakes TMTA as part of its function of maintaining the nation's security and providing for the well-being, health and safety of communities. These activities ensure that NZDF maintains its operational capacity and ability to mobilise and respond to a wide range of emergency or security situations, including search and rescue operations and support and natural disaster relief in the aftermath of events such as the Canterbury and Kaikoura earthquakes.

The key matter of importance to NZDF is the appropriate provision for TMTA within the Proposed Plan. NZDF is undertaking a nationwide project to update the standards in district

¹ Set out in section 5 of the Defence Act 1990

plans relating to TMTA and has taken the opportunity to provide feedback and submissions on several district and regional plan reviews and proposed plan changes throughout New Zealand.

NZDF **does** wish to be heard in support of its further submission.

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

A copy of this further submission has been sent to each person who made the original submission.



Person authorised to sign
on behalf of New Zealand Defence Force

date 25/08/2020

Table 1: NZDF Further Submission

#	Original Submitter's Name	Number	NZDF position	Section Reference and Summary of Submission	Reason	Decision Sought
DP General						
1	Transpower New Zealand Limited	565.1	Support	Amend the rules tables to ensure that each activity has an explicit activity status. The proposed plan contains many activities which do not have an explicit activity status, which causing ambiguity.	NZDF considers that adding an explicit activity status for every rule would provide certainty and clarity for all users of the District Plan.	Accept the submitter's relief sought by adding an explicit activity status for every rule in the plan.
Objectives and Policies						
2	Ngāti Rāhiri Hapū o Te Atiawa (Taranaki) Society Incorporated	503.12	Oppose	Objective NOISE-O3 (Noise sensitive activities and reverse sensitivity) Amend to require noise emitters to mitigate noise effects within the Motunui Major Facility Zone.	NZDF considers that the proposed amendment would create inconsistent application of Objective NOISE-O3 in the district. It is important to ensure that new noise sensitive activities are located away from existing activities to avoid reserve sensitivity effects. In any case, Objective NOISE-02 provides for noise mitigation.	Reject the submitter's relief sought
3	KiwiRail Holdings Limited	514.60	Support	Objective NOISE-O3 (Noise sensitive activities and reverse sensitivity) Amend wording to include " or additions to existing activities " as part of the objective.	It is appropriate to include additions to existing noise sensitive activities. Intensified development of existing activities increases the potential for reverse sensitivity effects.	Accept the submitter's relief sought by amending Objective Noise-O3 text as requested.
4	KiwiRail Holdings Limited	514.17	Support	Strategic objective UFD-21 (Major facilities and large scale industrial activities) Amend objective to include " infrastructure ".	NZDF considers that infrastructure is also important to economic and social well-being and prosperity and this should be acknowledged in the objective.	Accept the submitter's relief sought by amending Objective UFD-21 text as requested.
5	Chorus New Zealand	547.22	Support	New Strategic Objective: Infrastructure.	It is important to appropriately provide for infrastructure, including Defence facilities, and	Accept the submitter's relief sought, subject to appropriate objectives and

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				Insert an objective that recognises the importance of infrastructure across the entire district.	inserting a strategic objective on this aspect is considered a suitable option.	policies.
6	Kāinga Ora - Homes and Communities	563.385	Support	Objective TEMP-O1 (Temporary activities enhance and contribute to the district). Supports objective.	NZDF supports the provision for temporary activities in the district and recognition of the contribution these activities make to the district.	Accept the submitter's relief sought.
7	Kāinga Ora - Homes and Communities	563.382	Support	Policy TEMP-P1 (Effects of temporary activities are managed) Amend wording to: 'enable' rather than 'allow'.	NZDF supports the provision for temporary activities in the district and the management of their effects.	Accept the submitter's relief sought.
8	Kāinga Ora - Homes and Communities	563.383	Support	Policy TEMP-P2 (Manage frequency, scale, and duration of temporary activities) Amend wording by deleting policy point (3) which is contrary to the purpose of temporary activities.	NZDF supports the policy as proposed with the deletion of point 3 as requested by Kāinga Ora.	Accept the submitter's relief sought
9	Kāinga Ora - Homes and Communities	563.387	Support	Policy TEMP-P3 (Requirements to manage effects of temporary activities) Amend to clarify wording and correct a spelling error.	NZDF supports the policy as proposed, subject to the clarifications and corrections requested by Kāinga Ora.	Accept the submitter's relief sought
10	Kāinga Ora - Homes and Communities	563.386	Support	Policy TEMP-P4 (Temporary activities that exceed permitted noise levels shall demonstrate effects are appropriate).	NZDF supports the policy as proposed with the deletion of subsection 6. as requested by Kāinga Ora	Accept the submitter's relief sought.
11	Kāinga Ora - Homes and Communities	563.384	Support	Policy TEMP-P5 (Traffic generation effects of temporary activities).	NZDF supports the retention of policy TEMP-P5.	Accept the submitter's relief sought

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Definitions						
12	Transpower New Zealand Limited	565.25	Support in part	New definition: "Temporary Infrastructure: Short-term structures and activities undertaken by a network utility operator as defined by the Resource Management Act 1991, including the operation of generators such as diesel-powered generators."	NZDF uses temporary infrastructure (incl. diesel-powered generators, the example given in Transpower's submission). NZDF supports the inclusion of a definition but requests that it is not limited to structures and activities undertaken by a network utility operator.	Accept the submitter's relief sought in part (i.e. the inclusion of a definition for temporary infrastructure but not limited to network utility operators).
13	Transpower New Zealand Limited	565.22	Support	Definition: Reserve sensitivity. Amend definition to include reference to structures and activities, and refer to effects rather than environmental effects.	It is appropriate to consider the vulnerability of existing lawfully established activities <u>and structures</u> to new activities.	Accept the submitter's relief sought by amending the wording as requested.
14	Kāinga Ora - Homes and Communities	563.85	Oppose	Definition: Reserve sensitivity. Delete definition for reverse sensitivity in its entirety.	It is appropriate to include a definition of reverse sensitivity.	Reject the submitter's relief sought
15	Kiwi Rail Holdings Limited	514.7	Support	Definition: Noise Sensitive Activities Amend the definition as follows: Activities sensitive to noise means any residential activity including in visitor, student or retirement accommodation, educational activity including in any child care facility, healthcare activity and any congregations within places of worship/marae.	The proposed definition is supported as it provides greater guidance on activities that are sensitive to noise effects.	Accept the submitter's relief sought.
16	Kiwi Rail Holdings Limited	514.2	Support	Definition: Functional need. Retain the definition as notified	NZDF supports the definition of functional need as it is consistent with Section 2 of the RMA	Accept the submitter's relief sought.

#	Original Submitter's Name	Number	NZDF position	Section Reference and Summary of Submission	Reason	Decision Sought
17	Fire and Emergency New Zealand	116.11	Support	Definition: Operational need. Retain the definition as notified.	NZDF supports the definition of operational need as it is consistent with Section 2 of the RMA	Accept the submitter's relief sought.
18	Fire and Emergency New Zealand	116.16	Support	Definition: Temporary activity	The definition of temporary activity is supported (in that it excludes emergency services and TMTA).	Accept the submitter's relief sought.
19	Kāinga Ora - Homes and Communities	563.134	Support	Definition: Temporary activity	The definition of temporary activity is supported (including the exclusion of TMTA).	Accept the submitter's relief sought.
Rules						
20	Kāinga Ora - Homes and Communities	563.399	Support in part	Supports rules TEMP-R2 (Temporary military training activities)	NZDF undertakes TMTA nationwide and it is important that such activities are provided for within New Plymouth.	Accept the submitter's relief in part but amend rules as per NZDF's original submission.
21	Fire and Emergency New Zealand	116.41	Support	TEMP: R3 Temporary emergency management training activities	NZDF supports the provision of a permitted activity rule for temporary emergency management training activities.	Accept the submitter's relief sought.