

From: [Davies, Rebecca](#)
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Subject: NZDF submission on proposed Otago RPS unclassified
Date: Wednesday, 1 September 2021 1:12:26 p.m.
Attachments: [210901 NZDF submission.pdf](#)

Good afternoon,

Please see, attached, a submission by the New Zealand Defence Force on the proposed Otago Regional Policy Statement.

Regards,

Rebecca Davies

Principal Statutory Planner, Defence Estate and Infrastructure
Te Ope Kātua o Aotearoa | New Zealand Defence Force

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Submission on Proposed Otago Regional Policy Statement

Clause 6 of First Schedule, Resource Management Act 1991

To: Otago Regional Council
Attn: Policy Team

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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, and are essential to enabling NZDF to fulfil its obligations under the Defence Act. They 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).

Within Otago, there is currently an Army Battalion Headquarters in Dunedin, HMNZS Toroa naval reserves centre in Dunedin, and a rifle range at Waitati. There is also potential for NZDF to need larger or additional facilities in Otago in the future.

In addition, NZDF may undertake temporary military training activities at other locations in the region outside of its existing facilities. It is necessary for existing and any future defence facilities and activities to be recognised and accommodated in the provisions of the Regional Policy Statement (RPS).


NZDF's submission requests a number of amendments to provisions to better recognise and provide for defence facilities as nationally and regionally significant infrastructure, as set out in the attached table.

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.

A handwritten signature in blue ink, appearing to read 'M. Davis', is written over a light pink rectangular background. The signature is cursive and fluid.

01/09/2021

Person authorised to sign
on behalf of New Zealand Defence Force

Point	Provision	Support/ oppose	Reasons	Relief sought
<i>Interpretation</i>				
1	Definition of 'Regionally significant infrastructure'	Support	NZDF supports the inclusion of 'defence facilities' in the definition of 'regionally significant infrastructure'	Retain definition as notified.
2	Definition of 'Nationally significant infrastructure'	Oppose	<p>The definition of 'Nationally significant infrastructure' in the proposed RPS does not include defence facilities.</p> <p>Defence facilities, including those in the Otago region, form part of a network of nationally important infrastructure, playing a significant role in both military training and national defence operations. The requested definition modification will provide defence facilities with the policy support and protection that is appropriate given their regional and national importance. This is consistent with the current direction of the Partially Operative Otago RPS 2019, as Policy 4.3.2 requires the national significance of defence facilities to be recognised.</p> <p>NZDF notes that while defence facilities are not included in the definition of 'Nationally significant infrastructure' in the National Policy Statement for Urban Development 2020 (NPS-UD), it is included in the definition of the same in the Urban Development Act 2020 (UDA)¹. Including defence</p>	<p>Amend the definition of 'nationally significant infrastructure' to include defence facilities. For example, either:</p> <p>(a) adopt the definition of 'Nationally significant infrastructure' in the UDA; or</p> <p>(b) amend the proposed definition as follows (addition underlined):</p> <p><i>“has, to the extent applicable to the Otago Region, the same meaning as in clause 1.4(1) of the National Policy Statement for Urban Development 2020 (as set out in the box below), <u>and also includes defence facilities</u>”</i></p>

¹ Section 9 of the Urban Development Act 2020 (interpretation): *nationally significant infrastructure means any of the following: ... (g) land and airspace designated for defence purposes under the Resource Management Act 1991.*

Point	Provision	Support/ oppose	Reasons	Relief sought
			facilities in this definition would align with the UDA, would not be inconsistent with the definition in the NPS-UD, and would ensure these nationally important facilities are appropriately recognised and provided for.	
3	Definition of 'Infrastructure'	Oppose	<p>The definition of 'infrastructure' in the proposed RPS repeats the definition contained in the RMA. However, the RMA definition does not explicitly encompass all of the infrastructure included in the proposed RPS definitions of 'nationally significant infrastructure' and 'regionally significant infrastructure'; for example, 'defence facilities'.</p> <p>For clarity and consistency, the definition should include 'nationally significant infrastructure' and 'regionally significant infrastructure'.</p>	<p>Amend the definition as follows:</p> <p><i>“has the same meaning as in section 2 of the Resource Management Act 1991 (as set out in the box below), and also includes <u>nationally significant infrastructure and regionally significant infrastructure</u>”</i></p>
<i>EIT – Energy, infrastructure and transport</i>				
4	Objective EIT-INF-04 – Provision of infrastructure	Support	Objective EIT-INF-04 appropriately recognises the benefits of effective, efficient and resilient infrastructure.	Retain Objective EIT-INF-04 as notified.
5	Policy EIT-INF-P10 – Recognising resource requirements	Support	Policy EIT-INF-P10 appropriately recognises the needs of infrastructure of national and regional importance.	Retain Policy EIT-INF-P10 as notified.

Point	Provision	Support/ oppose	Reasons	Relief sought
6	Policy EIT-INF-P12 – Upgrades and development	Support	It is appropriate to include a policy which provides for infrastructure upgrades and development, whilst ensuring that the efficiency in the delivery, operation and use of that infrastructure is increased.	Retain Policy EIT-INF-P12 as notified.
7	Policy EIT-INF-P15 – Protecting nationally or regionally significant infrastructure	Support	NZDF supports explicit recognition of the need to protect nationally and regionally significant infrastructure from reverse sensitivity effects, as these have the potential to curtail or constrain the operation of such infrastructure.	Retain Policy EIT-INF-P15 as notified.
<i>CE – Coastal environment</i>				
8	Policy CE-P8- Public access	Support	It is appropriate to include a policy which recognises the need to restrict public access to the coastal marine area for defence purposes in accordance with the Defence Act 1990.	Retain Policy CE-P8 as notified.