

Submission on Freshwater Planning Instrument Parts of Proposed Otago Regional Policy Statement

Clause 6 of First Schedule, Resource Management Act 1991

To: Otago Regional Council
Attention: Proposed Regional Policy Statement – Team Leader

Email: fpisubmission@orc.govt.nz

Feedback provided by: New Zealand Defence Force
Contact Person: Lucy Edwards, Senior Environmental Officer

Address for Service: New Zealand Defence Force
C/- Tonkin & Taylor Ltd
PO Box 2083
Wellington 6140

Mobile: +64 21 934 270
Email: Lucy.Edwards@nzdf.mil.nz / AGifford@tonkintaylor.co.nz

This is a submission on the freshwater planning instrument parts of Otago Regional Council's (ORC) proposed Regional Policy Statement (RPS).

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 1990. 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 RPS.

NZDF's submission requests the definition of specified infrastructure and supporting freshwater policy be retained as set out in the attached table.

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, **we will consider** presenting a joint case with them at the hearing.

A handwritten signature in black ink, appearing to be 'C. H. D.', written above a horizontal line.

Person authorised to sign
on behalf of New Zealand Defence Force

Date 16 November 2022

Attachment A: Detailed submission

Deletions are marked with ~~strike through~~ and additions with underline.

Point	Provision	Support/ Oppose / Amend	Reasons	Relief sought
<i>Interpretation</i>				
1.	Specified infrastructure definition	Support	Defence facilities are identified as 'Regionally Significant Infrastructure' in the proposed RPS as notified in June 2021. Therefore, Defence facilities will be 'specified infrastructure' under the proposed definition wording. This is considered appropriate given the significance of Defence facilities to New Zealand.	Retain definition as notified.
<i>Lf-VM-AER3</i>				
2.	Policy LF-FW-P9	Support	Given the significance of specified infrastructure to New Zealand, it is important that the policy framework provides for specified infrastructure in and around natural wetlands where appropriate.	Retain policy as notified.