TE OPE KĀTUA O AOTEAROA
DEFENCE FORCE

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Attention: Hearings Panel

Proposed Waitaki District Plan (Hearing Stream 2)

The New Zealand Defence Force (NZDF) (submitter 189, FS189) has reviewed the Section 42A Reports for Hearing Stream 2 (Energy, Infrastructure, Stormwater, Transport, Earthworks and Designations) and determined that it will not attend this hearing, but requests that this letter be tabled with the Hearings Panel.

Infrastructure Objectives and Policies

In its submission, NZDF supported objectives INF-O1, INF-O2, INF-O3, INF-O4, and policies INF-P1, INF-P2, INF-P3, INF-P4, INF-P9. NZDF supports the recommendations made by the Reporting Officer to retain the overall approach set out in the Infrastructure Chapter with some wording amendments to improve consistency between this and the Strategic Direction Chapters.

Additionally, NZDF supports the recommendations by the Reporting Officer to amend SD-IEE-O1 to recognise "*local, regional and national benefits of regionally and nationally significant infrastructure*".

Definition of "infrastructure" and "regionally significant infrastructure"

In submission points 189.8 and 189.6, NZDF sought the inclusion of "defence facilities" in the definitions of "infrastructure" and "regionally significant infrastructure". As noted in its original submission, NZDF has military interests throughout New Zealand. While NZDF does not currently have any facilities within the Waitaki district, this does not preclude facilities being established in the future. District plans are required to provide a framework for both existing and future activities. The fact that defence facilities may be established in the future is a relevant consideration, particularly given their strategic importance and the long-term nature of defence planning and investment.

Defence facilities have been included within the definition of 'regionally significant infrastructure' and in a new definition of 'additional infrastructure' (which adopts the NPS for Infrastructure definition of additional infrastructure). NZDF facilities across New Zealand form a network of infrastructure that provides for New Zealand's security, and the health, safety and wellbeing of people and communities. It is essential that NZDF facilities are afforded the recognition and protection provided by this definition. NZDF therefore supports the recommendations made by the Reporting Officer to include defence facilities within these infrastructure definitions.

However, the reporting officer has not recommended amendments to the definition of 'infrastructure', retaining the definition as notified. NZDF seeks to clarify that while it supports this definition in part, NZDF has also sought the inclusion of defence facilities within the definition of infrastructure, in addition to the other infrastructure definitions noted above. This

position does not appear to have been correctly reflected in the S42A reports by the Reporting Officer.

Protection of infrastructure from reverse sensitivity effects

In submission point 189.23, NZDF sought inclusion of a new, broader policy which provides for the management of reverse sensitivity effects from development on the function and operation of regionally significant infrastructure. The Reporting Officer recommends rejecting this point on the basis that the existing policy framework in the Proposed District Plan provides sufficient recognition and protection of infrastructure.

NZDF acknowledges and supports the direction set out in Objective INF-04:

> ***INF-04: The protection of regionally significant infrastructure***
>
> *The operation and function of regionally significant infrastructure are protected from incompatible subdivision, use and development, including reverse sensitivity effects from the establishment of new activities.*

However, the policies that directly implement this objective are narrowly framed and focus on adverse effects on the Electricity Distribution Network (INF-P5) and Electricity Transmission Network / National Grid (INF-P6) only. In this respect, **the policy only partly implements the objective i**.e. only for the infrastructure specifically identified.

In order to give effect to the NPS for Infrastructure and to fully implement Objective INF-O4, neither of which are restricted to the Electricity Distribution or Transmission Network, NZDF considers the inclusion of a policy to address reverse sensitivity effects on infrastructure more broadly is required as provided in the example below:

> ***INF-PXX: Reverse sensitivity***
>
> *Avoid activities that may compromise the safe and efficient operation, maintenance, upgrade or development of regionally significant infrastructure, including through reverse sensitivity effects.*

If the Hearings Panel considers it useful for NZDF to appear before the Panel to explain or answer any questions on the matters above, it would be happy to do so.

Yours faithfully,



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