IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF The Proposed Canterbury Land & Water Regional Plan notified by Environment Canterbury

STATEMENT OF EVIDENCE OF ROBERT OWEN
FOR NEW ZEALAND DEFENCE FORCE
HEARING GROUP 1 – PROPOSED CANTERBURY LAND & WATER REGIONAL PLAN

Dated: 27 February 2013

1.0 Introduction

1.1 My full name is Robert Colin Owen.

1.2 I hold the degrees of Bachelor of Science (Honours) and Master of Science

1.3 I am employed by New Zealand Defence Force, (NZDF) within the Defence Shared Services - Property Group as Environmental Manager. In that role I oversee a team of six staff responsible for management of the effects of interactions between NZDF activities and the environment. The role covers the activities of the three services (Army, Navy and Air Force) throughout New Zealand. Specifically, in relation to the Proposed Canterbury Land & Water Regional Plan, I am responsible for environmental management in relation to the Military Training Area and Camp at Tekapo, Burnham Camp, West Melton Training Area, the Ammunition Storage Facility at Glentunnel and several smaller facilities.

1.4 I am familiar with the Proposed Canterbury Land & Water Regional Plan ('the Proposed Plan'). I have coordinated the preparation of NZDF submissions and further submissions on the Proposed Plan.
1.5 Ms Reaburn will be presenting detailed planning evidence for NZDF; my intention in this statement is to briefly refresh the panels' knowledge of Defence land holdings and activities in the region and to introduce the main themes of our submission.

2.0 General Overview of NZDF in the Region

2.1 I understand that the Hearings Committee has read our submission and further submissions. To supplement the information on NZDF land holdings contained in our submissions I have attached to this statement maps depicting the key locations referred to in submissions and in this statement.

2.2 The **Tekapo Military Training Area**, at approximately 15,000ha, is the principal South Island training area for the NZ Army, and at times accommodates the Air Force, the Police, and, under Inter-Government agreements, the Singaporean and other Armed Forces.

2.3 NZDF has been undertaking military training activities in this area since 1954, when the first parcel of land was purchased for these purposes. Subsequent land acquisitions and exchanges (the latest in 2012) have resulted in the training area now comprising approximately 15,000ha.

2.4 The **Tekapo Military Training Area** is extremely valuable to NZDF as a training area and is the only NZDF location in the South Island that can be used to conduct live field firing and firing of larger calibre weapons.

2.5 **Tekapo Camp**, at approximately 310 ha, provides basic accommodation for troops using the Tekapo Military Training Area. It also provides safe storage for vehicles, equipment, weapons and ammunition associated with exercises in the training area. Infrastructure includes water supply, wastewater collection treatment and disposal.

2.6 **Burnham Military Camp**, at approximately 510ha, is used intensively for housing, training facilities, office accommodation and vehicle and equipment storage and maintenance. While the Tekapo Training Area is vital to training,
Burnham Camp is the Army’s primary South Island base facility. Infrastructure provided by NZDF includes water supply and stormwater as well as wastewater collection treatment and disposal.

2.7 Burnham camp was first established in 1918 as an ordnance depot and was upgraded to a full training facility at the outbreak of World War 2.

2.8 **West Melton Range**, at approximately 420ha, provides purpose built ranges for live firing of small arms, grenades and engineering explosives as well as non-ammunition activities such as driver training. West Melton Range was established during World War II. The range is the only dedicated training range of its type in the South Island and is considered by NZDF to be a nationally significant strategic asset. Like the Tekapo training area West Melton Range is also used by NZ Police and the armed forces of other nations. Infrastructure provided by NZDF includes water supply as well as wastewater collection treatment and disposal.

2.9 **Glentunnel Ammunition Storage Facility**, at approximately 300ha, provides secure storage and handling facilities for military ammunition and explosives. The depot was first established during World War 2, was disestablished in the late 1960s and re-established in the early 1990s. Infrastructure provided by NZDF includes water distribution, wastewater collection treatment and disposal.

3.0 **Main Submission Themes**

3.1 I want to make it clear that NZDF generally supports the provisions of the Proposed Plan and is not seeking major change or blanket exemptions. I believe that minor improvements to the policies and rules, as recommended by Ms Reaburn, will address NZDF’s concerns without compromising the objectives of the Proposed Plan.

*Regionally and Nationally Significant Strategic Infrastructure*

3.2 Military training is a nationally significant strategic activity mandated by the Crown. NZDF regards each of its facilities as regionally and nationally
significant strategic infrastructure. The major facilities represent significant investments and are irreplaceable.

3.3 NZDF believes that its facilities should be recognised and appropriately provided for in the Proposed Plan, by being treated in a similar manner to other, more traditional, infrastructure (such as airports or roads).

**Provider of community infrastructure**

3.4 At each of its facilities, NZDF provides community services and infrastructure, such as water and wastewater services, to the resident military communities at its facilities in Canterbury (approximately 1200 staff plus their dependents). NZDF therefore provides an important community function at these facilities.

3.5 NZDF considers it appropriate that it be treated in a similar manner to other providers of water, wastewater and stormwater services by the Proposed Plan.

3.6 Each of these facilities is designated for Defence Purposes in the applicable District Plan (Mackenzie or Selwyn). In each case the Requiring Authority for the designation is the Minister of Defence representing the Crown. The facilities are necessary to enable NZDF to perform functions mandated by the Crown through the Defence Act 1990.

*Remove unnecessary restrictions on day-to-day activities*

3.7 Military training involves a wide range of activities, some of which are somewhat unusual, particularly in the context of regional plan policies and rules intended to control the effects of conventional productive land uses. NZDF wishes to ensure that policy and rules written to manage the effects of more normal and widespread activities do not, as an unintended consequence, impose unreasonable constraints or permitting requirements on military training activities carried out on a relatively small scale in specific and limited areas, and often only with short term and minor effects.

3.8 A good example of the risk of unintended consequences is the treatment of hazardous substances in the Proposed Plan. The policy and rules appear to be based on an assumption that all hazardous substances are liquid, and
therefore "spillable". NZDF stores, transports and uses quantities of hazardous substances in the form of ammunition and explosives. These materials are solids and not "spillable" in the way the Proposed Plan has envisaged yet would be subject to the same policies and rules. (I'm aware that the reporting officers' recommendations have addressed this particular issue to our satisfaction but it remains a useful example.)

4.0 Summary

4.1 NZDF is a significant landowner carrying out nationally significant strategic activities which are somewhat unusual but nevertheless essential.

4.2 Continued conduct of those activities is potentially disadvantaged by the focus of the Proposed Plan on management of the effects of conventional productive land uses.

4.3 Minor changes to the Proposed Plan will address NZDF's concerns without compromising the objectives of the Proposed Plan.