

From: [Edwards, Lucy](#)
To: [Mailroom Mailbox](#)
Subject: [unclassified] NZDF Submission on PC 1 to the CRPS
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Attachments: [NZDF submission on PC 1 to the CRPS .pdf](#)

Good morning

Please find attached a submission on proposed Plan Change 1 to the Canterbury Regional Policy Statement, on behalf of the New Zealand Defence Force.

Happy to discuss further.

Ngā mihi nui,

Lucy Edwards

M: 021934270

Senior Environmental Offr (Statutory Planning)

Defence Estate and Infrastructure

Te Ope Kātua o Aotearoa | New Zealand Defence Force

www.nzdf.mil.nz

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Submission on Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement

Clause 6 of First Schedule, Resource Management Act 1991

To: Environment Canterbury
Address: PO Box 345
Christchurch 8140
Email: mailroom@ecan.govt.nz

Submitter: New Zealand Defence Force
Contact Person: Rebecca Davies, Senior Environmental Officer

Address for Service: New Zealand Defence Force
C/- Tonkin + Taylor
PO Box 2083
Wellington 6140
Attn: Sarah Bevin
SBevin@tonkintaylor.co.nz

Phone: +64 21 934 270
Email: lucy.edwards@nzdf.mil.nz

1 Introduction

The New Zealand Defence Force (NZDF) has military interests throughout New Zealand. Within the Canterbury Region, NZDF is a significant stakeholder with Burnham Military Camp, West Melton Rifle Range, Weedons Depot and Communications Site, the Glentunnel Ammunitions Depot, the Royal New Zealand Air Force Museum at Wigram and the Royal New Zealand Naval Volunteer Reserve centre all located within the Region. These facilities are essential to national security and Defence operations both in the South Island and nationally.

2 Submission overview

Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement (CRPS) identifies future development areas for urban housing in Rolleston, Rangiora and Kaiapoi. The future development areas, within the amended Map A – Greenfield Priority Areas, are appropriately located in and around the existing residential areas.

Plan Change 1 also adds policy provisions to enable Selwyn and Waimakariri District Councils to rezone land within the future development areas through their district planning processes, if required to meet shortfalls in housing capacity. NZDF supports the inclusion of policy 6.3.12 which outlines the circumstances for urban residential development to occur in the future development areas. This policy requires rezoning decisions to be informed by

demand and a consideration of the efficient use of urban land and infrastructure provision. Such a policy will facilitate coordinated residential development.

Additionally, NZDF supports the retention of the policy provisions that protect strategic infrastructure, which includes Defence facilities, from the reverse sensitivity effects of residential development. It is critical that the continued operation and possible expansion of Defence facilities is not compromised by residential development in order for NZDF to meet its obligations under the Defence Act 1990.

A detailed submission is attached.

NZDF **could not** gain an advantage in trade competition through this submission.

Should a hearing be held, 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 a hearing, should a hearing be held.

A handwritten signature in black ink, appearing to be 'L. Edwards', is positioned above a horizontal line.

Person authorised to sign
on behalf of New Zealand Defence Force

Date 15/02/2021

Point	Provision	Support/ Oppose	Reasons	Relief Sought
<i>Amendments to 'Map A – Greenfield Priority Areas': Identification of Future Development Areas</i>				
1	Map A Amendments to show 'Future Development Areas'	Support	The future development areas are located in and around the existing centres of Rolleston, Kaiapoi and Rangiora. There are no NZDF sites in the vicinity off Rangiora or Kaiapoi that will be impacted by the future development areas. Weedons Depot and Communications Site and Burnham Military Camp are located near Rolleston. Residential growth in the Rolleston future development area is unlikely to affect NZDFs operations or result in reverse sensitivity effects to the operation of Burnham Military Camp or the Weedons Depot and Communications Site.	Retain Map A as notified.
<i>Amendments to Chapter 6</i>				
2	Policy 6.3.3	Support	Requiring development in a future development area to occur in accordance with an outline development plan is appropriate to achieve coordinated and considered development.	Retain Policy including PC1 changes as notified.
3	Policy 6.3.5	Support	The inclusion of future development areas into this policy is appropriate to ensure that any residential development is coordinated with infrastructure development. Also, subpoint 4 requires new development to not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure. This includes Defence facilities, including Burnham Military Camp and West Melton Military Training Area. NZDF supports the retention of subpoint 4 in its entirety as it is critical that NZDF can continue to operate, and if required, expand its facilities to meet its obligations under the Defence Act 1990.	Retain Policy including PC1 changes as notified.
4	Policy 6.3.7	Support	Including a policy directing residential greenfield development to occur within the areas identified on Map A – Greenfield Priority Areas is appropriate.	Retain Policy including PC1 changes as notified.
5	Policy 6.3.9	Support in part	This policy outlines the circumstances when rural-residential development can occur outside of the existing residential areas or greenfield priority areas. The inclusion of the future development areas into this policy is appropriate.	Request that point 5(e) is updated as follows to include all Defence Facilities. <i>'not compromise the operational</i>

Point	Provision	Support/ Oppose	Reasons	Relief Sought
			NZDF supports the retention of subpoint 5(e) which requires rural residential development to not compromise the operational capacity of the Burnham Military Camp and the West Melton Military Training Area, and requests that its other facilities are also included to ensure operational capacity is not compromised by inappropriate development.	<i>capacity of the Burnham Military Camp, West Melton Military Training Area, RNZAF <u>Weedons Depot and Communications Site, Glentunnel Ammunitions Storage Depot</u> or Rangiora Airfield.</i>
6	Policy 6.3.12	Support	It is appropriate to include a policy which outlines the circumstances in which urban residential development is to be enabled within the future development areas. This policy will avoid premature development prior to there being an adequate demand. It will also facilitate coordinated development which considers the required supporting infrastructure.	Retain Policy as notified.
<i>Definitions</i>				
7	Future Development Areas	Support	As above, NZDF supports the mapped areas as shown on the amended Map A – Greenfield Priority Areas.	Retain definition including PC1 changes as notified.