

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A
SUBMISSION ON THE PROPOSED TE TAI O POUTINI PLAN**

Clause 8 of Schedule 1 Resource Management Act 1991

To: Te Tai o Poutini Plan Team
Address: 388 Main South Road, Paroa, Greymouth 7805
Email: info@tpp.nz

Further Submitter Details

Name of further submitter: New Zealand Defence Force
 Contact person (if different from above): Lucy Edwards, Senior Statutory Planner
 Postal address: C/- Tonkin + Taylor. PO Box 5271. Victoria Street West, Auckland 1142
 Email address for service: Lucy.Edwards@nzdf.mil.nz / RPurdy@tonkintaylor.co.nz
 Phone number: +64 21 934 270

The TTPP team will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.

I am: (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.
 (In this case, also specify the grounds for saying that you come within this category); or
- b) A person who has an interest in the proposal that is greater than the interest of the general public. (In this case, also explain the grounds for saying that you come within this category); or
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

Under Section 5 of the Defence Act 1990, NZDF responsibilities include the defence of New Zealand, the protection of the interests of New Zealand, the provision of assistance to the civil power either in New Zealand or elsewhere in time of emergency, and the provision of any public service.

TTPP Hearing (please tick relevant box)

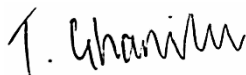
Do you wish to be heard in support of your further submission? Yes No

If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes No

Submission

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

Note: Any attachments to your submission should only be supporting information, not the submission.



Tara Ghanim

p.p.

Lucy Edwards, Senior Statutory Planner

Signature of the person making further submission
or the person authorised to sign on behalf of the
person making further submission.

12/06/2023

Date

Name of Further Submitter New Zealand Defence Force

My specific further submission(s) are as follows:

(Please only insert one further submission point per line. Add further sheets as required)

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>		The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want TTPP to make)</i>	
Buller Conservation Group - S552	S552.158	Oppose	<p>Temporary Activities definition.</p> <p>The submitter suggests amendment of definition by the insertion of the following: environmental values are not degraded and that wildlife is not disturbed – e.g. temporary light could severely disturb long-tailed bat foraging; motorsports’ noise and air pollution could severely disturb nesting birds, as could the noise of military training camps. Restricted discretionary matters consider effects on wildlife.</p>	<p>Temporary Military Training Activities (TMTA) are subject to bespoke noise standards set out in Rule R4. The majority of TMTA are not typically “noisy activities”. In any case TMTA are defined separately from temporary activities so the inclusion of ‘military training camps’ is not appropriate, nor is it consistent with the National Planning Standards definition of TMTA.</p>	<p>Reject the submitters relief and retain definition.</p>
Manawa Energy Limited (Manawa Energy) – S438	S438.024	Oppose	<p>Add a new definition of the term ‘regionally significant infrastructure’ based on the West Coast Regional Policy Statement.</p> <p>The Proposed Tai Poutini Te Wai Pounamu Regional Plan (pTTPP) contains a number of varying definitions applicable to Renewable Electricity Generation activities. To ensure consistency with the RPS and to avoid variations, Manawa seeks that the term ‘regionally significant</p>	<p>NZDF supports the existing definition of ‘critical infrastructure’ in the Proposed Plan, which includes defence facilities. If this definition is amended to ‘regionally significant infrastructure’ then NZDF requests that defence facilities be included within this amended definition. Defence facilities are critical for New Zealand’s security and for the safety and well-being of the community and are recognised as regionally (or nationally) significant infrastructure in a number of District and Regional Plans across the</p>	<p>Reject submitter’s submission. Alternatively, if the submitter’s relief is accepted, then “Defence Facilities” should be included in the definition of regionally significant infrastructure (as they currently are in the definition of ‘critical infrastructure’).</p>

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want TPPP to make)</i>
			infrastructure' is included within the Plan	country ¹ . They are also recognised as nationally significant infrastructure in the Urban Development Act 2020.	
Grey District Council – S608	S608.006	Oppose	Add a new definition of the term 'regionally significant infrastructure' based on the West Coast Regional Policy Statement.	Refer above.	Reject submitter's submission. Alternatively, if the submitter's relief is accepted, then "Defence Facilities" should be included in the definition of regionally significant infrastructure (as they currently are in the definition of 'critical infrastructure')..
Manawa Energy Limited (Manawa Energy) – S438	S438.003	Oppose	Delete the term 'critical infrastructure' and replace with 'regionally significant infrastructure' based on the West Coast Regional Policy Statement. The submitter suggests that the use of varying terminologies is confusing and unnecessary and are seeking to replace the term 'critical infrastructure' with 'regionally significant infrastructure' to align the district plan with commonly used definitions as applied in national direction and ensure consistency with the West Coast Regional Policy Statement (RPS). Although the two definitions differ slightly, the submitter prefers the RPS definition and suggests that it could be updated to include any necessary aspects of the 'critical infrastructure' definition.	Refer above.	Reject submitter's submission. Alternatively, if the submitter's relief is accepted then "Defence Facilities" should be included in the definition of regionally significant infrastructure (as they currently are in the definition of 'critical infrastructure').

¹ E.g. Otago RPS and Canterbury RPS, and Christchurch, Opotiki, Ruapehu, Whanganui and Southland district plans.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want TTPP to make)</i>
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) – S560	S560.061	Oppose	<p>Critical Infrastructure definition.</p> <p>The submitter is seeking to amend the definition so that is limited to specific entities and infrastructure that delivers a service operated by a “lifeline utility (as defined in the Civil Defence Emergency Management Act 2002)”</p>	<p>The definition of a lifeline utility under the Civil Defence Emergency Management Act 2002 does not include NZDF facilities and therefore would exclude the defence facilities under the definition. However defence facilities are critical for New Zealand’s security and for the safety and well-being of the community and are required to be included in the definition of critical infrastructure.</p>	<p>Reject submitter’s relief sought.</p>
Westport Pistol Club – S336	S336.011	Support	<p>NOISE - R4 – Emission of noise for Temporary Military Training Activities (TMTA).</p> <p>Allows for TMTA with a minimum separation distance from houses of 500m during the hours of 7am to 7pm, but then reduces that minimum distance to just over 1m for night times. Amend the rule with the inclusion of a capital ‘K’ to read 1.250Km (as in Kilometres).</p>	<p>Rule R4(1)(b)(ii) refers to “7pm to 7am: 1.250m”.</p> <p>The reference to 1.250m is a drafting error. The error should be corrected to state 1,250m as per NZDF’s original submission point.</p>	<p>Allow submission point to correct drafting error in Plan and refer to 1,250m as set out in NZDF’s original submission and for consistency with other TMTA noise standards in District Plans across NZ.</p>
Westport Rifle Club Incorporated – S457	S457.010	Support	<p>NOISE - R4 – Emission of noise for Temporary Military Training Activities (TMTA).</p> <p>Allows for TMTA with a minimum separation distance from houses of 500m during the hours of 7am to 7pm, but then reduces that minimum distance to just over 1m for night times. Amend the rule with the inclusion of a capital ‘K’ to read 1.250Km (as in Kilometres).</p>	<p>Rule R4(1)(b)(ii) refers to “7pm to 7am: 1.250m”.</p> <p>The reference to 1.250m is a drafting error. The error should be corrected to state 1,250m as per NZDF’s original submission point.</p>	<p>Allow submission point to correct drafting error in Plan and refer to 1,250m as set out in NZDF’s original submission and for consistency with other TMTA noise standards in District Plans across NZ.</p>
Radio New Zealand - S476	S476.019	Support	<p>INF-P3: Manage reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure to ensure their safe, secure and efficient operation.</p>	<p>NZDF facilities are considered critical infrastructure. It is appropriate that reverse sensitivity from subdivision, use and development is avoided in the first instance to prevent future conflicts</p>	<p>Accept submitter’s relief and insert proposed wording to the policy.</p>

I support/oppose the submission of: (State the submission no., name and address of the person making the original submission)	The particular part of the submission I support/oppose are: (State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)			The reasons for my support / opposition are: (State the nature of your further submission, giving reasons)	I seek that the whole (or part) of the submission be allowed / disallowed: (Give precise details of the decision you want TTPP to make)
			<p>RNZ supports a policy that addresses reverse sensitivity effects.</p> <p>Subject to its relief on the definition of “critical infrastructure”, RNZ seek that this is expressly included in the policy. Further, RNZ considers the policy wording should be strengthened to recognise the significant chilling effect reverse sensitivity can have on infrastructure, and the difficulty in addressing this effect once it arises.</p> <p>Amend as follows: “Manage Avoid reverse sensitivity effects from subdivision, use and development, on utilities and infrastructure, in particular critical infrastructure, to ensure their safe, secure and efficient operation.”</p>	<p>between land use activities and the operations of the defence facilities.</p>	
Horticulture New Zealand – S486	S486.056	Support in part	<p>The submitter supports the recognition of potential reverse sensitivity effect. However the objective should refer to ‘legally established activities’. Additionally, the objective refers to ‘noise sensitive activities’ but there is no definition for the term.</p> <p>Amend NOISE-02: Replace ‘existing and permitted future’ with ‘lawfully established’.</p> <p>Add a new definition for ‘noise sensitive activities’: residential activities, education facilities, visitor accommodation and health facilities.</p>	<p>NZDF's supports policy provisions which seek to protect existing and future noise generating activities from reverse sensitivity effects.</p>	<p>Accept in part the submitter’s relief and insert proposed definition for ‘noise sensitive activities’ (or similar).</p> <p>In addition, if the submitter’s relief on Noise-02 is granted, ensure there is clarity regarding the definition of lawfully established activities, in particular that this includes designations.</p>

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want TTPP to make)</i>
Federated Farmers of New Zealand – S524	S524.100	Support in part	<p>NOISE-O2.</p> <p>The submitter seeks to amend the objective and refer to ‘lawfully established activities’ to allow for consistency with the definitions in the Plan. Noise sensitive activities are not defined in the Plan. The type of activity that is considered to be noise sensitive should be made clear in the Plan.</p> <p>Amend NOISE-O2</p> <p>The function and operation of lawfully established activities that generate noise and community infrastructure are not compromised by adverse effects, including reverse sensitivity effects, from noise sensitive activities.</p> <p>Include a definition for noise sensitive activities:</p> <p>Means activities that may be affected by noise including residential activities, education facilities, visitor accommodation, health facilities.</p>	<p>NZDF's supports policy provisions which seek to protect existing and future noise generating activities from reverse sensitivity effects.</p>	<p>Accept in part the submitter’s relief and insert proposed definition for ‘noise sensitive activities’ (or similar).</p> <p>In addition, if the submitter’s relief on Noise-O2 is granted, ensure there is clarity regarding the definition of lawfully established activities, in particular that this includes designations.</p>

Note to Further Submitter

This further submission on the Proposed District Plan must be received by **5pm on 26 May 2023**.

To get your further submission to us, either:

Complete it online at: www.ttpn.nz

Email to: info@tppn.nz

Post to: PO Box 66, Greymouth, 7840

Attention: TTPP Team

Deliver to: 388 Main South Road, Paroa, Greymouth 7805

A copy of your further submission **MUST** be served on the original submitter within 5 working days after it is served on the local authority. Contact details for all submitters can be found on our Submissions page at www.ttpn.nz.

Please note all information provided in your submission, including your personal information, will be made publicly available.

Your submission (or part of it) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of it):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.