

Whangarei District Council
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4 July 2017

Attention: Hearings Panel, Proposed Plan Changes 85, 85A-A, 86A, 87, 102, and 114 to the Whangarei District Plan

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PROPOSED PLAN CHANGES 85, 85A-D, 86A, 87, 102, AND 114 TO THE WHANGAREI DISTRICT PLAN – HEARING COMMENCING 3 JULY 2017

The New Zealand Defence Force (NZDF) has made submissions on the Proposed Plan Changes 85, 85A-D, 86A, 87, 102, and 114 to the Whangarei District Plan on various matters involving NZDF facilities such as the Army Regional Office, and in relation to Temporary Military Training Activities (TMTA).

NZDF has reviewed the Officer's s42A report on the Proposed Plan Changes 85, 85A-D, 86A, 87, 102 and 114 with respect to NZDF's submission points assigned to these topics and makes the comments set out below.

Rule RVE.2.3.3: TMTA at night time

The Officer's s42A report rejects NZDF's submission point to exclude TMTA from the hours restriction of Rule RVE.2.3.3.c.ii. and to amend RVE.2.3.3.c.ii so that it relates to the effects of activities undertaken at night.

NZDF disagrees with the Officer's s42A report and conclusion in this regard. The rule as it stands requires that any activity in the Rural Village Industry Sub-Environment that operates outside the hours of 0600-2200 obtain consent as a discretionary activity. From time-to-time NZDF may be required to undertake TMTA at night for the purpose of training in real-life situations. NZDF submits that TMTA are appropriate at night time within the Rural Village Industry Sub-Environment where they comply with the noise standards under NAV.6.10, which have been developed to specifically protect the amenity of noise sensitive receivers and include a lower night time limit. TMTA should therefore be provided for as a permitted activity in this Sub-Environment at all times of the day.

Rule CA.2.3.3 2.2: Minor earthworks within sand dunes

NZDF notes that the Officer's s42A report contains conflicting recommendations in different sections of the report. Within the s42A report – Part 1, the Officer recommends to reject NZDF's submission point to Amend Rule CA.2.3.3 and/or the definition of earthworks. In the s42A report – Part 4, the officer recommends to accept the submission point and recommends changes to CA.2.3.3, which will allow

NZDF to undertake minor earthworks within sand dunes without the need to obtain consent as a discretionary activity. The current definition of earthworks in the Plan is very broad and includes any modification to the shape of land surface. This means that any activity that alters the surface shape of a sand dune would require consent, regardless of whether it includes earthworks in its usual sense (excavation or filling) or whether there are environmental effects. It is appropriate that very minor disturbance be permitted where the environmental effects are minimal. NZDF therefore supports the recommendation contained in Part 4 of the s42A report.

TMTA Definition: Inclusion of temporary buildings

NZDF notes the amendment to the definition of TMTA to include *“any associated building established onsite for a maximum period of 60 days.”* NZDF supports this amendment and has no further recommendation to the wording.

Rule LAN 3.1.3.1 and LAN 5.5: Earthworks and indigenous vegetation clearance

NZDF notes the amendment to Rule LAN.3.1.4.1 to permit indigenous vegetation clearance if it is directly associated with a TMTA and the amendments to Rule LAN.5.1 Table 1 and Table 2 to include buildings associated with TMTA as a permitted or restricted discretionary activity depending on the Outstanding Natural Feature (ONF). NZDF supports these amendments and has no further recommendations on these submission points.

Overall, NZDF does not wish to attend the hearing on the Proposed Plan Changes 85, 85A-D, 86A, 87, 102, but retains the right to appear at future hearings on other topics if required.

Yours faithfully



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