

**BEFORE THE HEARINGS PANEL
UPPER HUTT CITY COUNCIL**

IN THE MATTER OF THE RESOURCE MANAGEMENT ACT 1991

A N D

IN THE MATTER Of an Intensification Planning Instrument, as a proposed plan change to the Upper Hutt City District Plan under the Resource Management Act 1991, Schedule 1, Subpart 6.

**STATEMENT OF EVIDENCE OF LUCY EDWARDS
ON BEHALF OF THE NEW ZEALAND DEFENCE FORCE
SUBMITTER #53, FURTHER SUBMITTER #13**

14 April 2023

INTRODUCTION

- 1 My name is Lucy Edwards and I am employed by the New Zealand Defence Force, (NZDF) within Defence Estate and Infrastructure, as a Senior Statutory Planner. My role is national and “tri-service”, which is to say I manage and engage in Resource Management Act statutory processes on behalf of Army, Navy and Air Force throughout New Zealand in relation to on-base and off-site infrastructure and activities.
- 2 NZDF is a government department, an element of the Crown, and provides military capability as required by Government. NZDF is empowered and authorised in its activities by the Defence Act 1990 and by output agreements with Government.
- 3 Today I would like to make a short statement, providing background to NZDF’s submission and evidence as it relates to the Intensification planning Instrument (**IPI**) as a proposed plan change to the Upper Hutt City District Plan (**the proposed Plan Change**). I confirm that I have the authority to provide evidence in relation to the matters set out below on behalf of NZDF.
- 4 I am familiar with NZDF’s submission and further submission on the Proposed Plan Change having directed consultants in preparation of those.

SUMMARY OF STATEMENT

- 5 The Trentham Military Camp is located in the Upper Hutt district. The Camp is a significant Defence facility and is of strategic importance regionally, nationally and internationally. The New Zealand Government purchased land for the Camp in 1900, and the Camp has been in operation since before World War I.
- 6 Trentham Military Camp is susceptible to the pressures of urban development and the potential for reverse sensitivity effects. It is therefore important that the proposed Plan Change appropriately addresses this. It is particularly relevant given the strategic importance of the Camp and the significant intensification enabled by the Plan Change.
- 7 Development surrounding the Camp must proceed in a way that does not adversely affect the safe and efficient operation of the Camp. NZDF therefore requests that the proposed Plan Change provisions are amended as set out in Appendix A to Mikayla Woods’ evidence, to ensure that reverse sensitivity

effects on lawfully established non-residential activities, such as the Trentham Military Camp, are minimised.

STRATEGIC IMPORTANCE OF THE TRENTHAM DEFENCE FACILITIES

- 8 NZDF provides military capability as required by the New Zealand government and is empowered and authorised by the Defence Act 1990. Defence facilities may be used for any or every purpose required by Section 5 of the Defence Act 1990 including:
 - a The defence of New Zealand;
 - b The protection of the interests of New Zealand;
 - c The contribution of forces under collective security treaties, agreements or arrangements;
 - d The contribution of forces to, or for any purposes of, the United Nations;
 - e The provision of assistance to the civil power either in New Zealand or elsewhere in the time of emergency; and
 - f The provision of any public service.

- 9 The Trentham Defence Facilities occupy a land area of approximately 222 hectares and include:
 - a Main fenced Camp area;
 - b HQ Joint Forces NZ;
 - c The Messines Defence Centre;
 - d Camp housing area, including dwellings on Gower and Stafford Streets;
 - e Davis Field (playing fields);
 - f Golf Course;
 - g Defence College;
 - h Trentham Rifle Ranges;
 - i Demolitions Range.

- 10 Trentham Military Camp is designated by the Minister of Defence for Defence Purposes under the Operative Upper Hutt City District Plan (DEF 1). It is a nationally significant facility for NZDF and is of critical importance for ongoing NZDF operations. For the avoidance of doubt, Trentham Military Camp as referred to in this evidence includes all the Trentham Defence Facilities located within Designation DEF 1.

- 11 The Camp is located in a highly strategic location, both regionally and nationally, being close to New Zealand's capital city and almost mid-way between the North and South Islands. It is strategically placed in relation to other NZDF facilities located throughout the lower North Island, including the Linton Military Camp, RNZAF Base Ohakea and the Waiouru Military Camp. It is also strategically placed in relation to NZDF facilities in the upper South Island, including RNZAF Base Woodbourne.
- 12 Trentham Military Camp is a tri-service military camp, in that it provides for activities by the Army, Navy and Air Force. A number of NZDF units are based at Trentham Military Camp, such as the Headquarters of the Joint Forces New Zealand. This is the operational level headquarters, responsible for the command and control of all NZDF operations worldwide.
- 13 The New Zealand Defence Force Command and Staff College is also based at Trentham Military Camp and is the premier educational institute for NZDF. The College provides professional military education to officers, preparing them for command and staff appointments. Other units based at Trentham Military Camp include the New Zealand Explosive Ordnance Disposal Squadron, and the Trade Training School.
- 14 The Trentham Rifle Ranges have been in operation since being surveyed in 1896. These Ranges are now used by sport shooting clubs and the NZ Police, as well as NZDF. They include an ammunitions storage facility and a demolitions range. This range provides an important community benefit as it is used for personnel training, destruction of unexploded ordinances, and for the emergency destruction of devices or items found by the public.
- 15 The safe and efficient operation of Trentham Military Camp now and into the future is critical to ensuring NZDF can achieve the purposes set out in the Defence Act 1990, including maintaining capability in order to be able to respond to a wide variety of regional, national and international events.
- 16 This response includes providing aid and assistance following emergencies such as earthquakes and major storm events, for example, the 2010 Christchurch and 2016 Kaikoura earthquakes, the flood event in Edgecumbe and Whakatane in 2017 and more recently, the White Island eruption, cyclone Gabrielle and the Auckland floods.

REVERSE SENSITIVITY EFFECTS

- 17 Reverse sensitivity risks that more recently established noise sensitive activities pose to existing lawful activities, including long-established Defence facilities, are very real.
- 18 As a Defence-specific example, in 2019, developers who own land adjacent to RNZAF Base Auckland (the Whenuapai Airbase) successfully applied to the Environment Court for a declaration that noise from engine testing (an essential part of aircraft maintenance at all airports and airfields) is subject to noise conditions that could not be complied with. The consequence of that declaration is that engine testing cannot be undertaken at the Airbase without breaching the RMA. Without engine testing, aircraft cannot fly and Defence operations therefore cannot proceed. Ultimately the Minister of Defence issued a certificate under s 4(2) RMA on the grounds of national security to enable this essential Defence activity to continue.
- 19 Similar to the Whenuapai Airbase, Trentham Military Camp comprises ‘effects-producing’ activities, such as the firing and demolitions ranges. The result of this is that effects, such as noise, are not confined to the designation boundaries. The inability for the Camp to internalise all of its noise effects is recognised in Special Purpose Zone issue SAZ13 of the Upper Hutt City District Plan.
- 20 This noise could be perceived by residents as an adverse effect, particularly residents new to the area.
- 21 There is clear policy direction within the Operative District Plan which aims to provide for the operation and development of the Trentham Military Camp.¹ NZDF is therefore pleased to see that the Council’s Evidence Report on the Plan Change recognises that increased permitted development enabled by the Medium Density Residential Standards and National Policy Statement on Urban Development 2020 has the potential to increase the likelihood of reverse sensitivity effects. NZDF supports the inclusion of reverse sensitivity effects as a matter of discretion on a number of restricted discretionary rules as proposed in the Report, as signalled in the evidence of Mikayla Woods at paragraph 32.

¹ Upper Hutt City District Plan, policy SAZ-P1.

22 Notwithstanding this, given the considerable intensification enabled by the Plan Change, NZDF considers the potential for reverse sensitivity effects on the operations and functioning of the Camp remains. NZDF requests that protection against reverse sensitivity effects, especially on Trentham Military Camp, are recognised and provided for more broadly in the Subdivision, High Density and General Residential Zones chapters, as set out at Appendix A to Mikayla Woods' evidence, for the reasons provided in paragraph 33 of her evidence.

CONCLUSION

- 23 Trentham Military Camp occupies a highly strategic location. Defence facilities in general, and activities undertaken within defence facilities, are integral to NZDF maintaining its military capability and in turn providing for the country's security and stability, as well as the community's wellbeing and safety.
- 24 Trentham Military Camp is susceptible to the pressures of urban development and the potential for reverse sensitivity effects. NZDF therefore considers it extremely important that the issue of reverse sensitivity is adequately addressed within the proposed Plan Change.
- 25 The further amendments sought by NZDF as identified in Appendix A to Mikayla Woods' evidence are necessary to protect the ongoing operation of the Trentham Military Camp and ensure reverse sensitivity effects are avoided or minimised wherever practicable.

Lucy Edwards

14 April 2023