

Submission on Proposed Waimakariri District Plan

Clause 6 of First Schedule, Resource Management Act 1991

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1. Introduction

The New Zealand Defence Force (NZDF) has military interests throughout New Zealand. Although NZDF does not currently operate any facilities in Waimakariri District, NZDF may develop facilities in the district in the future. NZDF may also undertake Temporary Military Training Activities (TMTA) at any location in New Zealand, including in Waimakariri District. NZDF provided feedback on the Issues and Options papers in October 2017 and on *What's the Plan* in May 2019 and is pleased to see TMTA provided for in the Proposed Plan. However NZDF seeks some amendments to the provisions and has provided updated noise standards for TMTA.

2. Background

NZDF is undertaking a nationwide project to update the rules and standards in district plans relating to TMTA. NZDF undertakes TMTA across the country as part of its function of maintaining the nation's security, maintaining NZDF operational capacity and providing for the well-being, health and safety of communities. TMTA can include a range of activities, from office/ classroom based activities to large scale military exercises, and might involve Search and Rescue, infrastructure support (such as deployment of water purification and supply facilities as used in the aftermath of the Canterbury earthquakes), bomb deactivation training, weapons firing, personnel movements, dog training etc. They may be undertaken over a period of days or weeks on an intermittent or continuous basis, during both day and night.

A detailed submission is attached as Attachment 1. Also attached is more information on the nature of TMTA (Attachment 2), revised Permitted Activity Noise Standards for Temporary Military Training Activities which NZDF is seeking to be included in the District Plan (Attachment 3), and an explanation for the replacement noise standards (Attachment 4).

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

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 the hearing.

p.p.



Person authorised to sign
on behalf of New Zealand Defence Force

25 November 2021
Date _____

Attachment 1: NZDF Submission

NZDF submission on the Proposed Waimakariri District Plan				
Point	Provision	Support/ Oppose	Reasons	Relief Sought
Definitions				
1	Emergency Service	Support in part	NZDF is often involved in emergency service activity (e.g. firefighting, search and rescue operations, including following earthquakes and other natural disasters) and therefore should be included in this definition. This is consistent with the Defence Act 1990.	Add the New Zealand Defence Force to the example services listed in this definition as follows: <i>“means an authority or service that is responsible for the safety and welfare of people and property in the community during times of emergency that include, but are not necessarily limited to, fire service, ambulance, police, <u>New Zealand Defence Force</u> and emergency co-ordination authorities or services.”</i>
2	Hazardous facility	Support	NZDF supports the exclusion of the use, transportation, or storage of any hazardous substance for any temporary military training activity from the definition of hazardous facility. This is appropriate as military training activities are materially different from the other activities listed.	Retain as notified
3	Infrastructure	Oppose	The RMA definition of infrastructure does not include defence facilities. NZDF does not currently have major facilities in Waimakariri District, however this does not preclude the need for future defence infrastructure in the district. Defence facilities are critical for New Zealand’s security and for the safety and well-being of the community. As such, they should be identified as	Include defence facilities in the definition as follows: <i>“has the same meaning as in section 2 of the RMA <u>and also means defence facilities.</u>”</i>

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			<p>infrastructure which is the approach taken in a number of plans around the country, including the Auckland Unitary Plan.</p> <p>The addition of defence facilities to the definition of infrastructure in the Proposed District Plan is particularly important due to the differing and overlapping definitions of various types of infrastructure in the Proposed Plan some of which have been carried over from the Canterbury Regional Policy Statement. This will provide clarity and certainty that defence facilities are included in the Proposed Plan's objectives and policies concerning infrastructure.</p> <p>NZDF requests defence facilities are added to the definition of infrastructure.</p>	
4	Regionally significant infrastructure	Support	<p>The definition includes strategic infrastructure which in turn includes defence facilities in its definition. Defence facilities are critical for New Zealand's security and for the safety and well-being of the community. Although NZDF does not currently have major facilities in Waimakariri District, this does not preclude the need for future defence infrastructure in the district and it is appropriate they are included in the definition.</p>	Retain as notified

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5	Strategic infrastructure	Support	Defence facilities are critical for New Zealand's security and for the safety and well-being of the community. Although NZDF does not currently have major facilities in Waimakariri District, this does not preclude the need for future defence infrastructure in the district. It is therefore appropriate that defence facilities are identified as strategic infrastructure.	Retain as notified
6	Reverse sensitivity	Support	It is appropriate that reverse sensitivity is recognised and provided for in the plan.	Retain as notified
7	Temporary activity	Oppose	NZDF requests that the definition for temporary activity specifically excludes temporary military training activities (TMTA). TMTA are very different from other temporary activities, with different effects that need to be managed. The draft plan provisions generally provide for TMTA and temporary activities separately, and excluding TMTA from this definition will provide clarity around the application of rules for temporary events versus TMTA, for example in the noise rules for temporary activities versus temporary military training activities.	<p>Amend definition by excluding temporary military training activity as follows:</p> <p><i>“means an activity or event and any ancillary structures that:</i></p> <ol style="list-style-type: none"> <i>1. is infrequent, temporary, of short duration with a defined end time; and</i> <i>2. creates no, or only negligible, lasting alteration or disturbance to any site, building or vegetation;</i> <p><i>it includes:</i></p> <ol style="list-style-type: none"> <i>a. performances, celebrations, concerts;</i> <i>b. exhibitions;</i> <i>c. circuses;</i> <i>d. parades;</i> <i>e. holiday observances;</i> <i>f. fetes, fairs and carnivals;</i>

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				<p>g. festivals; h. recreation and sporting events; i. filming; j. and other types of activities of similar character;</p> <p><i>Temporary activity excludes markets and other activities held on a regular basis such as daily, weekly, fortnightly, or monthly, and temporary events ancillary to domestic scale residential activities. <u>Temporary activity also excludes temporary military training activity.</u></i></p>
8	Temporary military training activity	Support	This definition identifies military training activities as separate from other temporary activities, which is appropriate. This definition is consistent with the definition included in the National Planning Standards.	Retain as notified
9	Temporary infrastructure	Oppose	NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. It is possible that TMTA could include the placement of temporary infrastructure such as pumps and fuel tanks for water purification training. NZDF requests that TMTA are specifically referenced in this definition.	<p>Amend definition to include infrastructure required for TMTA as follows:</p> <p><i>“means portable or transportable infrastructure, such as generators, pumps or fuel tanks, required on a temporary basis, such as during construction or other temporary activity <u>including temporary military training activity</u>, for a finite period of time and which are removed from the site of the activity or stage of that activity for which they are temporarily required upon completion of that activity or stage of that activity.”</i></p>


NZDF submission on the Proposed Waimakariri District Plan				
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Part 2 District-Wide Matters				
10	Energy and Infrastructure EI-O1.1	Support	It is appropriate that efficient, effective, resilient, safe and sustainable infrastructure can be developed and maintained to benefit the well-being of the District, including in response to future needs.	Retain as notified
11	Energy and Infrastructure EI-O3	Support	It is appropriate that reverse sensitivity is recognised and provided for in the plan.	Retain as notified
12	Energy and Infrastructure EI-P1	Support	It is appropriate that the benefits and provision of infrastructure is recognised.	Retain as notified
13	Energy and Infrastructure EI-P5	Support	It is appropriate that the functional and operational locational needs of infrastructure are taken into account in decision-making on new or major upgrades of infrastructure.	Retain as notified
14	Energy and Infrastructure EI-P6	Support	It is appropriate that the adverse effects of other activities and development on infrastructure are managed and that these effects do not compromise its operation or development.	Retain as notified
15	Energy and Infrastructure EI-R9	Support	NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. It is possible that TMTA in the district could include the placement of temporary infrastructure such as pumps and fuel tanks for water purification training. It is appropriate that the use of such temporary infrastructure is a permitted activity. NZDF also requests that infrastructure required for TMTA is included in the definition of temporary infrastructure (see Point 9 above)	Retain as notified

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16	NOISE-O2	Support	It is appropriate that reverse sensitivity is recognised and provided for in the plan.	Retain as notified
17	NOISE-P2 Limited duration noise-generating activities	Support in part	NZDF has requested in Point 7 above that the definition of temporary activity exclude temporary military training activities (TMTA) as these are different from other temporary activities with different effects. Consequently, it is necessary to add a specific reference to TMTA in this policy	Amend policy NOISE-O2 by adding TMTA as follows: <i>“Enable specific noise generating activities of limited duration that are:</i> <ol style="list-style-type: none"> <i>1. required for anticipated activities within zones or the District, including construction noise, audible bird scaring devices, frost control fans, temporary activities, <u>temporary military training activities</u>, and emergency services, and</i> <i>2. where noise levels and characteristics are consistent with the character and amenity values of the receiving environment”.</i>
18	NOISE-R2 Temporary Military Training Activity	Oppose	NZDF has updated its noise standards for temporary military training activities. These updated noise standards are provided in Attachment 3 with an explanation at Attachment 4 and are consistent with the standards adopted by other district plans nationwide. In developing these updated standards, NZDF has commissioned professional	Amend and replace with the noise standards for temporary military training activities in Attachment 3. Amend matters of control as follows: <i>“Activity status when compliance with NOISE-R2 (1) or (3) not achieved:</i> CON

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			<p>acoustic advice on appropriate permitted activity standards to control noise effects from TMTA. This report can be provided on request.</p> <p>The replacement noise standards proposed by NZDF focus on compliance at dwellings, residentially zoned sites, and buildings used for residential, educational or healthcare purposes.</p> <p>In summary, the NZDF's proposed standards divide noise sources from TMTA into four categories: weapons firing and explosions; other mobile sources such as vehicles and earthmoving equipment; fixed noise sources such as power generators and water pumping; and helicopter landing areas. Each of these noise sources has different noise characteristics, and therefore a different set of standards for controlling noise. NZDF considers that this division allows a more comprehensive and appropriate method for controlling noise from TMTA.</p> <p>We have also included a more detailed explanation for the replacement noise standards for TMTA as Attachment 2.</p> <p>NZDF requests that the activity status when compliance with any of the relevant standards is not achieved be Controlled. NZDF must undertake training in order to fulfil its statutory</p>	<p><i>Matters of control are restricted to <u>noise and duration</u>:</i></p> <p>NOISE-MD1 – Noise</p> <p>Activity status when compliance with NOISE-R2 (2) not achieved: RDIS</p> <p>-</p> <p>Matters of discretion are restricted to:</p> <p>NOISE-MD1 – Noise</p> <p>Activity status when compliance with NOISE-R2 (4) not achieved: (Refer to NOISE-R4)</p> <p>-</p> <p>Activity status when compliance with NOISE-R2 (5) not achieved: (Refer to NOISE-R19)"</p>

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			<p>obligations under the Defence Act. Controlled activity status provides certainty to NZDF that an activity can proceed and allows Council the control to ensure effects are appropriately managed.</p> <p>In determining what conditions to impose, Council should limit its control to effects relating to the permitted activity noise standards for TMTA – noise and duration (as sought to be amended by this submission).</p>	
19	NOISE-R4 Helicopter movements	Oppose	<p>The rules in NOISE-R4 are unnecessarily restrictive for helicopter landing and takeoffs associated with temporary military training activities. Noise from these activities can be appropriately managed by the use of NZS6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas, as is requested in Point 18 and the updated noise standards supplied as Attachment 3. NZDF requests that helicopter movements associated with TMTA are removed from this rule.</p>	<p>Amend as follows:</p> <p><i>“NOISE-R4 Helicopter movements This rule does not apply to helicopter movements at Rangiora Airfield or <u>as part of a temporary military training activity under NOISE-R2</u> or for emergency purposes provided for under NOISE-R5.”</i></p>
20	NOISE-R5 Helicopter movements for emergency purposes	Support	<p>It is appropriate that helicopter movements for emergency purposes, such as search and rescue, civil defence and in times of natural disasters are permitted activities.</p>	Retain as notified

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21	NOISE-MD1	Support in part	As requested in Point 18 above, NZDF seeks the inclusion of updated noise standards for temporary military training activity (TMTA) and a controlled activity status when the standards are not achieved. These standards are supplied in Attachment 3. In developing these noise standards, NZDF has commissioned professional acoustic advice on appropriate permitted activity standards to control noise effects from TMTA. This report can be provided on request. In the unusual event that TMTA fail to comply with the standards, matters of control should be restricted to a general assessment of noise and duration rather than specifying a separate report to be supplied.	Amend by deleting condition 10 requiring TMTA to supply a report prepared by an acoustic consultant as follows: NOISE-MD1 “... 10. For temporary military training activities, the extent to which compliance with noise standards has been demonstrated by a report prepared by a suitably qualified and experienced acoustic consultant.”
22	Temporary Activities New Objective		TMTA are not included in the definition of temporary activities in the Proposed Plan, and NZDF submits that TMTA should be specifically excluded for clarity. This means that TMTA are not included in the objective and policy framework for Temporary activities, although there are specific rules for TMTA. NZDF requests the addition of a specific objective for TMTA.	Add a new Objective TEMP-O2 as follows: <u>“Temporary military training activities contribute to local and national security and provide for the health, safety and wellbeing of the community, and are enabled”.</u>
23	Temporary Activities New Policy		TMTA are not included in the definition of temporary activities in the Proposed Plan, and NZDF supports this and submits that TMTA should be specifically excluded for clarity. This	Add a new policy TEMP-P6 as follows: <u>“Enable temporary military training activities to be undertaken within the District where adverse effects on amenity</u>

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			however means that there is no objective and policy framework for Temporary Military Training Activity in the Proposed Plan to support the specific rules for TMTA. NZDF requests the addition of a specific policy for TMTA.	<u>values are avoided, remedied or mitigated.</u> "
24	Temporary Activities TEMP-P3 Temporary structures	Support in part	NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. At times, TMTA require the placement and use of a temporary building or structure. These structures are temporary and are completely removed after the TMTA exercise. NZDF requests that policy TEMP-P3 reference temporary structures associated with TMTA.	Amend TEMP-P3 as follows: <i>"Enable temporary structures required for construction or demolition <u>and temporary military training activities</u>, and temporary storage of relocatable buildings where potential effects on the transport system, and amenity values of the surrounding environment are mitigated by limiting the duration, and in the case of any relocatable building, the location and connection to services."</i>
25	Temporary Activities TEMP-R5 Temporary Military Training Activity.	Oppose	NZDF supports the permitted activity status of TMTA across all zones. However NZDF requests a number of changes to the rule and accompanying standards. TMTA could include the placement of a temporary building or structure. These buildings or structures are completely removed after the exercise has concluded. As the plan includes rule TEMP-R7, a separate rule for temporary buildings associated with construction, NZDF requests that rule TEMP-R5 for TMTA also include temporary buildings	Amend as follows: <i>"Temporary Activities TEMP-R5 Temporary Military Training Activity <u>including associated buildings and structures</u>. Activity status permitted where:</i> <i>1. the maximum duration of the activity is 31 consecutive days (excluding set up and pack down activities) <u>at any one site</u>;</i> <i>2. the activity is not located in any SNA;</i> 

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			<p>and structures. This will ensure they permitted across all zones. Alternatively, a separate new rule permitting temporary buildings and structures associated with TMTA could be included.</p> <p>Standard 1 restricts TMTA to a maximum of 31 days on any site. While NZDF considers that a 31-day duration for the training activity itself is appropriate, this should not include set up and pack down activities which commonly can take up to seven days each. In addition, NZDF carefully selects sites which takes into account the management of effects including amenity effects, and enters into landowner agreements and may therefore use the same site on more than one occasion. This may exceed the 31 days/year limit.</p> <p>Standard 2 excludes TMTA from any SNA. TMTA can include a wide variety of activities, for example water purification training, and search and rescue training. TMTA activities are by their nature temporary, and many have effects similar to other day-to-day activities. TMTA are still subject to the same SNA rules around indigenous vegetation clearance and earthworks as other activities would be, so it is overly restrictive to prevent TMTA from occurring in an SNA. In addition, the</p>	<p>3. the site is restored to the same condition as prior to the temporary activity within seven days of that activity ceasing.</p> <p>Activity status when compliance with TEMP-R5 (1) and TEMP-R5 (2) not achieved: CON</p> <p>Activity status when compliance with TEMP-R5 (2) or (3) not achieved: RDIS</p> <p>Matters of control or discretion are restricted to:</p> <ul style="list-style-type: none"> • TEMP-MD1 - Character and amenity values • TEMP-MD2 - Transport • TEMP-MD3 - Site alteration, disturbance and remediation • TEMP-MD4 - Public safety and security"

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			<p>term SNA as defined in the Proposed Plan can include unmapped and mapped SNAs so it would be difficult to ascertain which areas this standard would apply to. NZDF requests that standard 2 be deleted.</p> <p>Standard 3 requires that the site is restored to the same condition as prior to the temporary activity within seven days of that activity ceasing. NZDF submits that this is an unnecessary rule and seeks it be deleted. For example, Earthworks below the Permitted Activity thresholds in the Earthworks chapter of the Proposed Plan do not require remediation as a standard.</p> <p>Finally, NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. Controlled activity status provides certainty to NZDF that an activity can proceed and allows Council the control to ensure effects are appropriately managed. NZDF requests that the activity status when compliance with the new standard relating to duration only is controlled.</p> <p>NZDF also submits that matters of control should be limited to character and amenity values only. As requested by NZDF, the permitted activity standards would relate to duration only. TMTA do not generate many vehicle movements, and any structures that may be required are removed, and the</p>	

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			site is restored to a good condition on completion of the activity, NZDF has its own strict safety protocols and procedures to ensure public safety at all times, including the noise standards which are sought to be included in the Proposed Plan (refer Point 18 above).	
26	Activities on the Surface of Water ASW-R1	Support in part	<p>NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. This rule provides for such training activity on the surface of most of Waimakariri District's water bodies.</p> <p>However, for those specified waterbodies where the activity status is non-complying, NZDF requests that defence purposes are added to the list of purposes which are permitted.</p> <p>We also note that the wording of standard 4 should end with an "or" rather than "and". This is not a mutually exclusive list.</p>	<p>Amend by adding defence purposes as follows: ASW-R1 ...</p> <p><i>"Where:</i></p> <ol style="list-style-type: none"> <i>1. the activity is undertaken on behalf of the District Council, Regional Council, government agency, or Fish and Game;</i> <i>2. the activity is undertaken for scientific research and education purposes;</i> <i>3. the activity is undertaken for civil defence, fire fighting, or search and rescue <u>or defence</u> purposes;</i> <i>4. the activity is undertaken by mana whenua for cultural and mahinga kai purposes; and or</i> <i>5. the activity is undertaken for farm management purposes".</i>

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27	Coastal Environment CE-R4	Support	It is appropriate that Less-Hazard-Sensitive Activities within the Low and Medium Hazard Areas of the Coastal Hazard Overlays be permitted.	Retain as notified
28	CE-R1 Use of motor vehicles – Permitted activity in certain high, very high and outstanding natural character areas only Where: 1. the motor vehicle is used for conservation activities, customary harvesting or is an emergency service vehicle.	Support	As noted in Point 1 above, NZDF should be included in the definition of emergency service, in recognition of its function and role in times of emergency. This would appropriately mean that NZDF vehicles could be used in these areas of higher value, when required.	Retain as notified
29	CE-R3 Any building or structure	Oppose	NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. TMTA can include a wide variety of activities, and it is possible that it could require the placement of temporary structures or buildings in the Coastal Environment Overlay. These structures are temporary and are completely removed after the TMTA exercise. It is inappropriate for standards relating to building dimensions and appearance to be applied temporary structures (which could include tents for example). Structures required for water purification training are required to be located in proximity to the water source, in this case coastal water.	Amend as follows: <i>“This rule does not apply to buildings or structures located in existing Residential Zones that are within 20m of identified coastal natural character areas, <u>or to buildings or structures that are part of a temporary military training activity</u>”.</i>

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			NZDF requests an exclusion for buildings and structures associated with TMTA.	
30	Earthworks EW- S1	Oppose	<p>NZDF submits that EW-S1 is overly restrictive for minor earthworks that may be required for TMTA in an SNA or in ONF Ashley River/Rakahuri Saltwater Creek Estuary. The definition of "earthworks" in the Proposed Plan includes any alteration or disturbance of land except for gardening, cultivation or fencepost placement.</p> <p>NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. TMTA can include a wide variety of activities, for example water purification training, and search and rescue training. TMTA activities are by their nature temporary, and many have effects similar to other day-to-day activities. As discussed in Point 25 above, it is possible that TMTA could be carried out in an SNA or in ONF areas. TMTA could require minor earthworks in relation to placement of temporary structures (such as a tent) or operation of water purification units for example. These are generally minor in nature and the land is reinstated after the activity. NZDF notes that indigenous vegetation clearance is managed separately by the ECO rules in the Proposed Plan, therefore TMTA would still be subject to these rules. NZDF submits that it is overly restrictive to prevent minor</p>	Amend EW-S1 to allow for minor earthworks to a maximum of 5 m ³ in an SNA or or in ONF Ashley River/Rakahuri Saltwater Creek Estuary as a permitted activity.

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			earthworks from occurring in an SNA or ONF area and that EW-S1 should contain a permitted activity volume threshold as for other zones and overlays.	
31	Natural Hazards NH-R5 Above ground infrastructure that is not critical infrastructure	Oppose	<p>NZDF must undertake training in order to fulfil its statutory obligations under the Defence Act. TMTA can include a wide variety of activities, which may require temporary infrastructure such as generators, fuel tanks and pumps. TMTA activities are by their nature temporary, and any adverse effects can be avoided or mitigated or are minor.</p> <p>As rule NH-R5 includes an advisory note that it applies in addition to the Energy and Infrastructure rules E1-R1 to E1-R56, this would potentially mean TMTA would not be permitted in these flood hazard areas, for example water purification equipment training which requires temporary location of pumps and portable water tanks near a water body.</p> <p>NZDF requests that NH-R5 excludes infrastructure for TMTA.</p>	<p>Amend to include temporary infrastructure as follows:</p> <p><i>“Activity status: PER</i></p> <p><i>Where:</i></p> <ol style="list-style-type: none"> 1. <i>the profile, contour or height of the land is not permanently raised by more than 0.25m when compared to natural ground level; and</i> 2. <i>new infrastructure or an extension to existing infrastructure:</i> <ol style="list-style-type: none"> a. <i>has a footprint of less than 10m²; or</i> b. <i>is not located within an overland flow path as stated in a Flood Assessment Certificate issued in accordance with NH-S1; or</i> c. <i>is limited to a customer connection; <u>or</u></i> d. <i>is for temporary military training activity.”</i>

Attachment 2 – Temporary Military Training Activities Information Sheet

The New Zealand Defence Force (NZDF) is required to undertake training activities in accordance with the Defence Act 1990.

These training activities include a wide range of activities, including: physical training, dog training, signals (radio communications) exercises, medical and dental exercises, Medivac simulation, Improvised Explosive Device Disposal (IEDD) exercises, IEDD search exercises (in commercial or industrial buildings as well as outdoors), Small construction tasks, camp setup, including field kitchens and ablutions, search and rescue, Civil Defence support, driver training and infrastructure support (e.g. water purification and supply facilities). NZDF also undertakes activities that are more recognisable as military exercises, including the use and firing of weapons (both live and blank ammunition) and the detonation of explosives.

A practical example of training relates to the unit that provides dental services to deployed troops. A key part of training is setting up and operating their deployable facilities in locations remote from their home base. They exercise that skill by setting up in location for a period and providing free dental care to patients who might otherwise miss out. School children in areas remote from dental services are often the beneficiaries of that training activity.

Troops also train within NZDF owned properties, military camps and bases. However, it is important that troops are trained outside of these locations to ensure the skills learned are able to be applied in new and different situations, not just in familiar areas.

Many activities are carried out “off-base” by NZDF personnel are essentially similar to training activities conducted by other public service or commercial organisations. Included in that comparison are (for example) NZ Police, NZ Fire Service, the various ambulance services, search and rescue, and specialist cliff rescue teams.

Training activities may include the use of powered machinery, vehicles or aircraft and may involve weapons firing and the use of explosives, in addition to the deployment of personnel. In some exercises weapons may be carried or set up for realism but not fired. Temporary military training activities may be undertaken over a period of days or weeks on an intermittent or continuous basis, during both day and night.

Training activities are carried out “off-base” for a variety of reasons and two of the important reasons are diversity and realism. Skills that are learned and practiced “on-base” must be tested or extended in unfamiliar contexts “off base”.

Extended “off-base” activities are costly in terms of funding and time and are not used for routine, repetitive training. An extended duration is not required to achieve the objective of testing skills in a different context. So, while an exercise might be undertaken over a period of days or weeks; typically an exercise would only take place in one locality for a period of a few days.

Attachment 3 - Permitted Activity Noise Standards for Temporary Military Training Activities

Rule X: Temporary Military Training Activities are permitted activities provided they comply with the following noise standards:

1. Weapons firing and/or the use of explosives

- a. Notice is provided to the Council at least 5 working days prior to the commencement of the activity.
- b. The activity complies with the following minimum separation distances to the notional boundary of any building housing a noise sensitive activity:
0700 to 1900 hours: 500m
1900 to 0700 hours: 1,250m
- c. Where the minimum separation distances specified above cannot be met, then the activity shall comply with the following peak sound pressure level when measured at the notional boundary of any building housing a noise sensitive activity:
0700 to 1900 hours: 95 dBC
1900 to 0700 hours: 85 dBC

2. Mobile noise sources

Shall comply with the noise limits set out in Tables 2 and 3 of *NZS6803:1999 Acoustics – Construction Noise*, with reference to ‘construction noise’ taken to refer to mobile noise sources*.

Note: Mobile noise sources (other than firing of weapons and explosives) include personnel, light and heavy vehicles, self-propelled equipment, earthmoving equipment.

3. Fixed (stationary) noise sources

Shall comply with the noise limits set out in the table below when measured at the notional boundary of any building housing a noise sensitive activity*.

Time (Monday to Sunday)	L_{Aeq} (15 min)	L_{AFmax}
0700 to 1900 hours	55 dB	n.a.
1900 to 2200 hours	50 dB	
2200 to 0700 hours the next day	45 dB	75 dB

Note: Fixed (stationary) noise sources (other than firing of weapons and explosives) include power generation, heating, ventilation or air conditioning systems, or water or wastewater pumping/treatment systems.

4. Helicopter landing areas

Shall comply with NZS6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas*.

* Noise levels shall be measured in accordance with NZS6801:2008 Acoustics – Measurement of Sound.

Attachment 4: Explanation for replacement noise standards for Temporary Military Training Activities

NZDF wishes to make sure that the noise standards included in Plans are up-to-date, appropriate for the type of noise generated and relatively simple to understand and assess compliance with. To this end, NZDF has commissioned professional acoustic advice on appropriate permitted activity standards to control noise effects from Temporary Military Training Activities (TMTA). This report can be provided on request. Based on this advice, NZDF has developed revised noise control standards that it will seek to have included in proposed plans nation-wide.

The replacement noise standards proposed by NZDF focus on compliance at dwellings, residentially zoned sites, and buildings used for residential, educational or healthcare purposes.

In summary, the NZDF's proposed standards divide noise sources from TMTA into four categories: weapons firing and explosions; other mobile sources such as vehicles and earthmoving equipment; fixed noise sources such as power generators and water pumping; and helicopter landing areas. Each of these noise sources has different noise characteristics, and therefore a different set of standards for controlling noise. NZDF considers that this division allows a more comprehensive and appropriate method for controlling noise from TMTA.

1. Weapons firing and/or the use of explosives

The noise control standard uses a tiered approach for weapons firing and explosives, where the first tier is separation distances between the activity and any sensitive receiver (dwelling, residentially zoned site, or building used for residential, educational or healthcare purposes). Two separation distances are specified – a nighttime distance and a daytime distance. The distances are conservative and have been arrived at after review and analysis of data measured from real military activities, to ensure that the sound levels received at the specified distances will be reasonable (generally less than 55 dBA for daytime and less than 45 dBA for nighttime). Using separation distance as a standard has the advantage of being an easy to comply with and easy to monitor standard.

For weapons firing/ explosives activities that are not able to meet the separation distance standard, or if the site location conditions meant that the setback could be reduced (e.g. where a hill separates a sensitive receiver from the TMTA), then the second tier - the peak sound pressure levels (dBC) - would apply. Where these peak sound pressure levels can be met, then the TMTA would be a permitted activity.

2. Mobile noise sources

For mobile noise sources (other than weapons firing and explosives), compliance with the construction noise standards is recommended, as this standard most appropriately addresses this type of noise.

3. Fixed (stationary) noise sources

For fixed noise sources, which can be located to ensure compliance with standards, dB LAeq levels are specified, in line with NZS6802:2008 Acoustics – Environmental Noise. This is considered the most appropriate way to control noise levels from these sources.

4. Helicopter landing areas

NZDF has also considered noise from helicopters associated with temporary military training activities. NZDF proposes the use of NZS6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas to