

**BEFORE THE DISTRICT PLAN HEARINGS PANEL**

**MANAWATU DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of Proposed Plan Change 55 to the Manawatu District Plan

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**STATEMENT OF REBECCA DAVIES  
ON BEHALF OF NEW ZEALAND DEFENCE FORCE  
SUBMITTER S08 AND FURTHER SUBMITTER FS3**

**1 DECEMBER 2016**

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**STATEMENT OF REBECCA DAVIES ON BEHALF OF THE NEW  
ZEALAND DEFENCE FORCE (NZDF) – SUBMITTER S08 AND  
FURTHER SUBMITTER FS3**

**INTRODUCTION**

- 1 My name is Rebecca Davies and I am employed by the New Zealand Defence Force, (NZDF) within the Defence Property Group, as Senior Environmental Officer (Planner). My role is national and “tri-service” which means I am responsible for managing statutory planning issues relating to the activities and facilities of Army, Navy and Air Force throughout New Zealand. I have been in that role since January 2016.
- 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 My statement provides background to NZDF's submission and evidence.
- 4 I am familiar with NZDF's submissions and further submissions on Proposed Plan Change 55 (PPC 55) having directed consultants in preparation of those.

**SUMMARY OF STATEMENT**

- 5 Temporary military training activities are essential and in many respects are similar to training activities carried out by other emergency services and commercial organisations. “Preparedness” is the ability to undertake military tasks, and is a major component of military capability.
- 6 Given the location of RNZAF Base Ohakea within the District and the proximity of Linton and Waiouru Camps, Manawatu District is important strategically as being an area where TMTA could be undertaken.
- 7 It is vital for NZDF personnel to be able to train in a variety of ‘environments’ to reflect real life scenarios. This is of local and national

importance. It is therefore essential that NZDF is able to carry out appropriate temporary military training activities across all zones in a district.

- 8 NZDF is seeking national consistency in provisions for temporary military training activities. This includes seeking district wide rules in District Plans nationwide.
- 9 Noise resulting from discharge of ammunition or explosives is the only unique effect of temporary military training activities that warrants specific management through the Manawatu District Plan.
- 10 NZDF has obtained specialist advice and has developed modern, effective and efficient controls for that noise. Those controls have been adopted by a number of District Councils in the review of their District Plans and are proposed for adoption in PPC55.

#### **NZDF IN THE MANAWATU DISTRICT**

- 11 NZDF has a long history in the Manawatu District, with the RNZAF Ohakea Air Base and Raumai Air Weapons Range located within the District. These facilities have been part of the District for decades and there is a long association between the District and NZDF. Linton Camp is also located in neighbouring Palmerston North City. The proposals we have submitted to Council do not necessarily signal a change in the nature or quantity of training likely to be conducted in the District; rather, we are seeking to simplify and modernise the rules applying to TMTA.
- 12 This enduring relationship has recently been acknowledged with the recent signing of a Statement of Intent between New Zealand Defence Force, Manawatu District Council and Palmerston North City Council citing mutual benefits between the three parties and recording the intention of these parties to work together in mutual areas of interest.
- 13 The purpose of that Statement is to strengthen the existing relationship between NZDF and the Councils and to foster development of the

Manawatu region as a capability hub supporting NZDF. Continued economic growth and jobs are seen to be a benefit for the region.

- 14 Against that background of association and commitment to mutual benefit NZDF is disappointed about the apparent misunderstanding regarding the purpose of TMTA and the importance to NZDF of being able to undertake TMTA in all zones in the District.

### **TEMPORARY MILITARY TRAINING ACTIVITIES - INTRODUCTION**

- 15 NZDF undertakes Temporary Military Training Activities across the country as part of its function of maintaining the nation's security and providing for the well-being, health and safety of communities.
- 16 Many district plans around the country are being or have been reviewed and NZDF is engaging in those review processes to ensure that where training activities might be subject to control through a district plan the controls are consistent and that compliance is simply achieved and assessed. To date NZDF has made formal requests or submissions to approximately 30 Councils including to Manawatu District Council and has pursued outcomes through Environment Court appeals in several cases.
- 17 An important point is that TMTA are conducted on land that is controlled by a private or public owner. Those owners, particularly public owners such the Council itself, can be expected to exercise normal discretion in allowing TMTA to take place. That is, as well as being subject to District Plan provisions, such activities require 'landowner approval' and will be subject to any conditions imposed by the landowner.

### **NATURE OF TEMPORARY MILITARY TRAINING ACTIVITIES**

- 18 Temporary Military Training Activities might include (but are certainly not restricted to) activities such as:
  - a. Search and Rescue

- b. Driver Training
- c. Medical and dental services
- d. Camp setup, including field kitchens and ablutions
- e. Small construction tasks
- f. Signals (radio communications) exercises
- g. Medevac simulation
- h. Civil Defence support
- i. Improvised Explosive Device Disposal (IEDD) exercises
- j. IEDD search exercises (in commercial or industrial buildings as well as outdoors)
- k. Infrastructure support (e.g. water purification and supply facilities)
- l. Dog training

as well as what might be more conventionally understood by the term “military training”.

- 19 By way of example, NZDF maintains a unit that provides dental services to deployed troops. A key part of training is setting up and operating their deployable facilities in locations other than 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. To better reflect ‘real world’ scenarios, NZDF may wish to undertake this training activity in a more populated area such as a Residential, Town Centre or Village zone. This is further discussed in paragraphs 23-28 below.
- 20 Many training activities carried out “off-base” by NZDF personnel are essentially similar to training activities conducted by other public service or commercial organisations such as NZ Police, NZ Fire Service, and various ambulance services.
- 21 Training activities may also 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.

- 22 Larger exercises of greater duration are generally mobile; moving though the country in accordance with an exercise scenario. Such an exercise might begin with landings at a port, move hundreds of kilometres over a period of days or weeks exercising various skills on the way; and might conclude at an NZDF training area. The most recent exercise of this type occurred in the top part of the South Island in 2015 and attracted significant community interest and participation. Within Manawatu District and surrounding area, a range of more ordinary TMTA are likely to be conducted. A table listing some examples of TMTA recently conducted in the surrounding area is attached at Appendix A.

#### **RATIONALE FOR SEEKING DISTRICT WIDE RULES AND UNDERTAKING TMTA IN ALL ZONES**

- 23 Given the location of RNZAF Base Ohakea within the District and the proximity of Linton Camp, Manawatu District is important strategically as being an area where TMTA could be undertaken.
- 24 TMTA are carried out “off-base” for a variety of reasons and one of the important reasons is diversity and to mimic ‘real life’ scenarios. If personnel are denied the ability to practice their skills in a diversity of environments they cannot do the job we all expect them to be able to do and capability is compromised. Personnel and public safety could be put at risk.
- 25 We only have to consider the NZDF response to the recent Kaikoura earthquakes to see the national and local benefits in NZDF having the capability to assist in a range of environments, including populated areas such as residential zones, towns and villages. It is in these areas that

there will be greater numbers of people requiring assistance. It is therefore essential that training activities can occur across all zones.

- 26 A range of activities including anti-terrorist training, search and rescue and emergency response benefit from diversity in training environment to accurately reflect where NZDF assistance would be required in a real life situation. It is also essential that personnel can train in a variety of structures, which will vary across zones. For example, the personnel who risk their lives searching a building when a phone call claims a bomb has been planted must train in a variety of buildings.
- 27 To provide for this diversity and 'real life' training, NZDF seeks to have the proposed Permitted Activity rule applied in all zones. It is essential that training is carried out in all zones because the contexts, buildings and interaction with people in these zones are less like those in Linton Camp and Base Ohakea and more like those in which operations might be conducted.
- 28 Restricting TMTA to a zone or having different rules for TMTA in different zones is problematic because personnel may be mobile or transiting over various zone boundaries as part of a training exercise. Consistency is therefore highly desirable from a compliance perspective. Having an appropriate degree of flexibility is also desirable in terms of reflecting real life scenarios which may require adapting to unexpected circumstances.

#### **'PLANNING' FOR TMTA, AND EFFECTS OF TMTA**

- 29 Temporary Military Training Activities are typically planned well in advance. As NZDF wishes to carry out TMTA 'lawfully', it is seeking consistency in planning rules at both a national and local level. This includes seeking a consistent definition for Temporary Military Training Activities and 'district wide' provisions for these activities in District Wide Rules Chapters.

- 30 For activities undertaken on land not owned by NZDF, NZDF secures landowner agreement to the activity. In the case of training involving weapons firing and the use of explosives, safety templates and potential effects on neighbouring land uses need to be determined in advance. Standards such as we have proposed through our submission in relation to noise management are a component of that process. NZDF acknowledges that noise effects from Temporary Military Training Activities need to be appropriately controlled within the District Plan. Activities involving discharge of ammunition generate noise that has quite specific characteristics and requires specific management to avoid unnecessary effects on nearby residences. NZDF seeks to ensure that the noise standards included in the District Plan are up-to-date, appropriate for the type of noise generated, and are reasonably simple to understand, to plan for compliance and to assess compliance with.
- 31 To this end, NZDF has commissioned professional acoustic advice on appropriate standards to control noise effects from Temporary Military Training Activities. Mr Hunt will provide detailed evidence on the acoustic standards we propose. Based on that specialist acoustic advice NZDF has developed revised permitted activity standards that provide a holistic and consistent means of managing and mitigating all the types of noise that might be generated by Temporary Military Training Activities conducted anywhere in the country. NZDF has been successful in having the revised permitted activity standards adopted through plan review processes in several districts and is currently engaged in many plan reviews with that end in mind.

## **CONCLUSION**

- 32 Temporary military training activities are essential and in many respects are similar to training activities carried out by other emergency services and commercial organisations.
- 33 I reiterate that it is vital for NZDF personnel to train in a variety of 'environments' to reflect real life scenarios. The recent NZDF response to



the Kaikoura earthquake provides a very timely example of the importance of NZDF being able to do so. It is therefore essential that NZDF is able to carry out temporary military training activities across all zones in a district.

- 34 Noise resulting from discharge of ammunition or explosives is the only unique effect of temporary military training activities that warrants specific management through the District Plan.
- 35 NZDF has obtained specialist advice and has developed modern, effective and efficient controls for that noise. Those controls have been adopted by various District Councils in the review of their District Plans and are proposed for adoption in this District Plan.



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Rebecca Davies

1 December 2016

## Examples of TMTAs undertaken recently in the surrounding area

Note this table is intended to give an indication of the types of activities that are undertaken in the surrounding area, and is not exhaustive.

Date/ frequency	Location	Activity	Other notes
2013	Old West Rd and surrounding farm areas	Route search along the road and edges of paddocks lining the road.  Improvised Explosive Devices dug in off the road, the areas restored after they were dug back up. An agreement was made with the land owners that any damages to fences would be fixed but none occurred.	Council permission was granted and a traffic plan was put in place, land owners of the surrounding paddocks also gave consent to search the edge of their paddocks. No negative feedback
8 – 17 October 2014	Bunnythorpe substation	Site survey – an exercise involving a simulated security risk to the building, equipment or people.	
Periodically	Palmerston North township, specifically Massey and the Esplanade and surrounding streets.	Physical training (PT) sessions up to 120 personnel at a time, up to three times a week, areas	NZDF has not received any negative feedback from the community about exercising in town
May 2015	Old West Road	Search training at Old West Road and a number of Council/Doc facilities.	Permission sought, including to be able to have the search dogs off the lead.
July – Sept 2014		150 <sup>th</sup> Celebrations.  Parade, Horse Troop Training, Vehicle display, Host morning Tea with PNCC at the library, Ball at the Race Course with vehicle display, Church Parade in Town Square, Marching in the streets with band playing, vehicle drive through	There was very close liaison with PNCC
Regular (up to 4 times a year)	Awapuni Race Course Leisureplex	Simulation – Siting of medical sections (2 x ute sized vehicles + trailers per section) and evacuation section (up to 5 ambulances) in urban areas (occurs up to 4 times a year)  Can include treatment of casualties (dressed up with fake wounds and blood)  Can include civil defence support scenarios	
Future		Siting of the Military tented surgical facility.	Likely to co-locate with Palmerston North Hospital and possibly conduct a surgical programme from that location

Date/ frequency	Location	Activity	Other notes
8 – 17 October 2014	Palmerston North CBD (Council Buildings)	High Risk Person (HRP) Survey on 1 x councillor in his office and home location	
2012		Houses for Charity was an initiative undertaken in partnership with UCOL, where 25 NZDF personnel (construction troop) assisted in completing houses for sale/auction in the local community, for their training purposes.	
2007/08		Abbey Field Retirement Home was a construction task that 25 NZDF personnel (construction troop) supported, for their training purposes.	
2014		25 NZDF personnel (construction troop) re-roofed the Palmerston North Boys Scout Hall, for their training purposes.	
Current	PNCC Cycleway	NZDF is assisting PNCC, for training purposes.	
Routine	Medical facilities including St Johns Ambulance service	Medical personnel working shifts in various facilities around the city	

