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Submission on proposed Plan Change 82 to the Selwyn District Plan

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The New Zealand Defence Force (NZDF) is a significant stakeholder in the Selwyn District, with the Burnham Military Camp, West Melton Rifle Range, Weedons Depot and communications Site and the Glentunnel Ammunitions Depot all located within the District. These facilities are essential to Defence operations both in the South Island and nationally. Burnham Military Camp provides a range of economic and social benefits to the district and wider region. Approximately 1,500 military and civilian personnel work and/or live at the Burnham Military Camp, which comprises training areas, facilities management, service delivery offices, workshops and personnel accommodation.

Selwyn District Council (SDC) notified Private Plan Change 82 which proposes to rezone approximately 110 ha of Rural Outer Plain Zone to Living MD and Business 1 Zone to allow for future residential development, including commercial centres. The subject land is about 1.8 km to the south east of NZDF's Burnham Military Camp.

PC82 proposes to allow for residential development of approximately 1,320 residential homes and two local community centres. NZDF is aware that this is one of many proposed planned changes occurring in the district and is concerned that if the roading network is not

upgraded, or managed appropriately, the safe and efficient access to Burnham Military Camp could be affected. NZDF notes that the transport assessment relies on road network upgrades which have not yet been confirmed. **It requests that the effects on the transport network, including in the vicinity of the Burnham Military Camp, are considered.**

Burnham Military Camp is specifically included in the definition of strategic infrastructure (and strategic infrastructure is included in the definition of “regionally significant infrastructure”) in the Canterbury Regional Policy Statement (RPS). There is clear policy direction requiring that new development does not affect the efficient operation, use, and development of strategic/regionally significant infrastructure. For example, the standards under Policy 5.3.2(1) of the RPS address a range of issues resulting from development that require careful management so as to avoid the potential for adverse effects. This includes the need to avoid the encroachment of sensitive activities into rural areas that may result in reverse sensitivity effects on established rural activities or regionally significant infrastructure.

In regard to reverse sensitivity, the Burnham Military Camp hosts a wide variety of activities, and reverse sensitivity can represent a major challenge to the continued operation of NZDF’s facilities. NZDF seeks to ensure that the operation of Burnham Military Camp is not affected by this Plan Change and resulting increase in residential and commercial development in the surrounding area.

If the plan change is accepted and development proceeds, NZDF requests that a no-complaints covenant be applied to all new titles created.

Such covenants place the responsibility of accepting the presence of the Military Camp, and effects (including noise) associated with its lawful operation, on the owner of that land. In this respect it is a simple, low cost and effective method of managing and avoiding reverse sensitivity effects. No complaints covenants also put potential new landowners, who may be unfamiliar with the area and the operation of the Burnham Military Camp, ‘on notice’ about effects from the Camp.

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, **NZDF will consider** presenting a joint case with them at the hearing.



09/05/2022

Person authorised to sign
on behalf of New Zealand Defence Force