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## Submission on Proposed Plan Change 73 Selwyn District Plan

*Clause 21 of First Schedule, Resource Management Act 1991*

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### Introduction

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) has recently notified Private Plan Change 73 (PC73), which proposes to rezone approximately 160 hectares of land to allow for more intensive residential development, along with commercial development, west of Rolleston. The subject land parcels are located approximately 2.5 and 3.8 km to the west of the Burnham Military Camp (located on State Highway 1).

NZDF wishes to highlight the critical importance of the Burnham Military Camp and to ensure the plan change does not adversely affect NZDF's continued ability to carry out operations at this facility.

NZDF's concerns include ensuring safe and efficient access to and from the Camp, along with the potential for reverse sensitivity effects on activities at the Camp. PC73 proposes up to 2,100 dwellings which represents approximately 27% of the existing dwellings in Rolleston

currently. NZDF is aware that this is one of a number of Plan Changes occurring in the District, and NZDF 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 appears to be based on upgrades to the network, however these upgrades have not been confirmed. NZDF therefore requests that the effects on the transport network, including in the vicinity of the Burnham Military Camp are considered in the absence of these upgrades.

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 the implications 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.*

The Resource Management Act 1991 (at s75 (3)) requires that a District Plan must give effect to (inter alia) any Regional Policy Statement.

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.

NZDF hereby makes a **neutral** submission on Plan Change 73.

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.




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Person authorised to sign  
on behalf of New Zealand Defence Force

Date: 3 May 2021