



Further Submission on Proposed Lower Hutt District Plan

Clauses 8 and 8A of First Schedule, Resource Management Act 1991

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This is a further submission by the New Zealand Defence Force (NZDF) on the Proposed Lower Hutt District Plan (proposed District Plan).

NZDF represents a relevant aspect of the public interest. Under Section 5 of the Defence Act 1990, NZDF statutory purposes includes the defence of New Zealand, the protection of the interests of New Zealand, the provision of assistance to the civil power either in New Zealand or elsewhere in times of emergency, and the provision of any public service. NZDF therefore has an interest in the Proposed District Plan that is greater than the interest the general public has.

NZDF has military interests throughout New Zealand. While NZDF does not currently have any NZDF owned facilities within the Lower Hutt district, NZDF does lease facilities within the district. It is also possible that NZDF may require facilities in this district at some point in the future. Trentham Military Camp is also in the neighbouring Upper Hutt district, which means there is a military presence in the wider Wellington region. NZDF may also undertake temporary military training activities (TMTA) in the Lower Hutt district.

NZDF **does** wish to be heard in support of its further submission.

If others make a similar further submission, NZDF will consider presenting a joint case with them at the hearing.

A copy of this further submission has been sent to each person who made the original submission.

date 24/07/2025

Person authorised to sign
 on behalf of New Zealand Defence Force

Original Submitter's Name and Address	Submission Number	Support/ Oppose	Section Reference and Summary of submission	Reason	Decision Sought
Royal Forest and Bird Protection Society of New Zealand Inc	424.51	Oppose	<p>The submitter has sought to AMEND NATC-P4 as follows:</p> <p><u>Consider providing</u> Provide for the use and development of land within coastal margins and riparian margins where:</p> <ol style="list-style-type: none"> 1. The use and development is of a scale, form, and nature that does not detract from <u>preserves</u> the natural character of the coastal margin or riparian margin, or and 2. The use and development: <ol style="list-style-type: none"> a. Has a functional need or operational need to be located within the coastal margin or riparian margin and no alternative locations are practicable, and b. Has been designed and located to minimise <u>avoid</u> adverse effects on the natural character of coastal margins and riparian margins, and c. <u>It maintains or enhances the ecological functions of the coastal margin and riparian margin.</u> 	<p>NZDF opposes the amendment to NATC-P4. As notified, the policy provides for use and development where there is a functional or operational need to be located within riparian margins.</p> <p>NZDF considers that the requested amendments are overly restrictive for activities which have a functional or operational need to be located within riparian margins (particularly temporary activities which only have temporary effects). As outlined in NZDF's original submission, Temporary Military Training Activities (TMTA) may at times have a functional or operational need to be located within riparian margins e.g. training activities involving use of portable water treatment units.</p>	Reject the submission point in full.
Royal Forest and Bird Protection Society of New Zealand Inc	424.96	Oppose	The submitter has sought to DELETE (1) and (2) from CE-R7 which provides for new buildings and structures and additions to existing buildings and structures in the coastal environment.	NZDF opposes the deletion of clause (1) and (2) from CE-R7. The deletion of (1) and (2) from CE-R7 would result in any new buildings and structures in the coastal environment, including those which are temporary, requiring resource consent as a restricted discretionary activity. NZDF considers this is an overly broad restriction for activities which may have very minor or negligible and/or temporary effects.	Reject the submission point in full.
BP Oil New	471.227	Oppose	The submitter has sought to AMEND the	NZDF opposes the resource consent	Reject the

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Zealand Ltd, Mobil Oil New Zealand Ltd and Z Energy Ltd (the Fuel Companies)			introduction to the Temporary Activities chapter: [...] This chapter therefore provides a more liberal pathway for certain temporary activities in zones where they might not otherwise be provided for. <u>Except in the Seaview Marina Zone and Heavy Industrial Zone at Seaview</u> , temporary activities are permitted where they meet certain standards. Where they exceed the thresholds in those standards, operators can apply for resource consents which assess the effects of those activities case by case. <u>Temporary activities in the Seaview Marina Zone and Heavy Industrial Zone at Seaview require resource consent so that risk and reverse sensitivity effects associated with proximity to nearby significant hazardous facilities and the Hutt City fuel transmission pipeline are appropriately avoided or managed.</u> [...]	requirement for temporary activities in the Seaview Marina Zone and Heavy Industrial Zone. Due to the nature of TMTA and the need for NZDF to train in unfamiliar real- world situations, TMTA may need to be undertaken in any zone within a city / district, including in industrial or marina zones. TMTA should be provided for as a permitted activity in all locations, subject to appropriate standards (as sought in NZDF's original submission). Potential risks to hazardous facilities and the Hutt City fuel transmission pipeline could be appropriately avoided or managed through appropriate permitted activity standards.	submission point in full.
BP Oil New Zealand Ltd, Mobil Oil New Zealand Ltd and Z Energy Ltd (the Fuel Companies)	471.228	Oppose	The submitter has sought to AMEND TEMP-O2 as follows: Temporary activities occur in ways that: <u>6. In the Seaview Marina Zone and Heavy Industrial Zone at Seaview, avoid unacceptable residual risk and reverse sensitivity effects associated with the nearby significant hazardous facilities and the Hutt City fuel transmission pipeline.</u>	Reasoning as above.	Reject the submission point in full.

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BP Oil New Zealand Ltd, Mobil Oil New Zealand Ltd and Z Energy Ltd (the Fuel Companies)	471.229	Oppose	<p>The submitter has sought to Insert new policy TEMP-PX as follows:</p> <p><u>TEMP-PX Temporary activities in the Seaview Marina Zone and Heavy Industrial Zone at Seaview</u> <u>Ensure that temporary activities within the Seaview Marina Zone and Heavy Industrial Zone at Seaview are appropriately located and managed to avoid unacceptable residual risk effects and reverse sensitivity effects associated with nearby significant hazardous facilities and the Hutt City fuel transmission pipeline.</u></p>	Reasoning as above.	Reject the submission point in full.
BP Oil New Zealand Ltd, Mobil Oil New Zealand Ltd and Z Energy Ltd (the Fuel Companies)	471.230	Oppose	<p>The submitter has sought to Amend TEMP-R1 as follows:</p> <p>All zones <u>excluding Seaview Marina Zone and Heavy Industrial Zone at Seaview</u> 1. Activity status: Permitted [...]</p> <p>All zones <u>excluding Seaview Marina Zone and Heavy Industrial Zone at Seaview</u> 2. Activity status: Restricted discretionary [...]</p> <p><u>Seaview Marina Zone and Heavy Industrial Zone at Seaview</u> 3. Activity status: Restricted discretionary</p> <p><u>Matters of discretion are restricted to:</u> 1. <u>Positive effects, including contribution to Lower Hutt's vibrancy, diversity, and</u></p>	Reasoning as above.	Reject the submission point in full.

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			<p><u>prosperity.</u></p> <p>2. <u>The management of residual risk effects and reverse sensitivity effects associated with nearby significant hazardous facilities and the Hutt City fuel transmission pipeline.</u></p>		