



14 September 2026

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Attention: Hearings Panel

Proposed Lower Hutt District Plan (Hearing Stream 6 – Infrastructure)

The New Zealand Defence Force (NZDF) (submitter 404, FS27) has reviewed the Section 42A Report for Hearing Stream 6 and determined that it will not attend this hearing, but requests that this letter be tabled with the Hearings Panel.

Infrastructure Objectives and Policies

In its submission, NZDF supported objectives INFSD-O2, INF-O1, INF-O2, PINF-O1, and policies INF-P1, INF-P2 and PINF-P1. NZDF supports the recommendations made by the Reporting Officer to retain INF-O1, INF-O2 and INF-P2 as notified. Additionally, NZDF supports the recommendations made by the Reporting Officer to retain the approach set out in the objectives INFSD-O3 and PINF-O1, and in policies INF-P1 and PINF-P1.

Definition of “infrastructure” and “regionally significant infrastructure”

In submission points 404.1 and 404.5, NZDF sought the inclusion of “defence facilities” in the definitions of “infrastructure” and “regionally significant infrastructure”. The Reporting Officer notes that there is not sufficient information to assess or provide recommendations on the requirements of defence facilities and has recommended the points be rejected.

As noted in its original submission, NZDF has military interests throughout New Zealand. NZDF currently leases a number of facilities within the Lower Hutt district but does not own any land. This does not preclude additional facilities being established in the future. District plans are required to provide a framework for both existing and future activities. The fact that defence facilities may be established in the future is a relevant consideration, particularly given their strategic importance and the long-term nature of defence planning and investment.

As acknowledged in the s42A Report, if NZDF were to develop a new defence facility in the district, it would most likely enable this through a designation process. However, notices of requirement for designations require consideration against the policy framework in a district plan. For this reason, it is important that the District Plan objectives and policies recognise the significance and benefits of defence facilities, which are of local, regional, and national importance.

Importantly, the National Policy Statement for Infrastructure 2025 (NPS Infrastructure) expressly includes defence facilities within the definition of “additional infrastructure”, which in turn forms part of the definition of “infrastructure”. The inclusion of defence facilities within the definition of “regionally significant infrastructure” would therefore assist in giving effect to the direction of the NPS Infrastructure to recognise and provide for the benefits of infrastructure.

NZDF acknowledges that the Proposed Lower Hutt District Plan adopts the RMA definition of “infrastructure” and that maintaining consistency with that definition may be desirable. Some

district plans nevertheless supplement the definition (e.g. Auckland Unitary Plan). However, even if the RMA definition of infrastructure is retained, defence facilities can still be recognised as regionally significant infrastructure.

The requested amendment would also be consistent with the Wellington Regional Policy Statement, which recognises defence facilities as “specified infrastructure”. Additionally, inclusion of “defence facilities” in the definition of “regionally significant infrastructure” is consistent with the approach taken in many other district plans which either recognise defence facilities as infrastructure and/or regionally significant/important infrastructure (refer Attachment 1).

NZDF’s wording as per its submission is:

Regionally significant infrastructure includes:

- a) pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment,*
- b) a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001,*
- c) a network operated for the purpose of radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989,*
- d) the National Grid,*
- e) facilities for the generation and/or transmission of electricity where it is supplied to the National grid and/or the local distribution network,*
- f) facilities for the electricity distribution network, where it is 11kV and above. This excludes private connections to the local distribution network,*
- g) the local authority water supply network (including intake structures) and water treatments plants,*
- h) the local authority wastewater and stormwater networks and systems, including treatment plants and storage and discharge facilities, and*
- i) the Strategic Transport Network*
- j) defence facilities*

Recognising defence facilities as regionally significant infrastructure does not create a presumption that such facilities are appropriate in all locations, nor does it alter the statutory tests applicable to future designations or resource consent applications. Rather, it appropriately acknowledges the local, regional and national benefits associated with defence infrastructure and ensures these benefits are recognised within the District Plan framework. Most importantly, NZDF considers the requested amendment is necessary to give effect to the National Policy Statement for Infrastructure 2025.

Protection of infrastructure

In submission point 404.12, NZDF sought the inclusion of a new, broader policy which provides for the management of reverse sensitivity effects from development on the function and operation of regionally significant infrastructure.

The Reporting Officer recommends rejecting this point, and submissions by others requesting similar policies, on the basis there is existing policy direction in the District Plan. However, the s42A Report does not identify which objectives and policies are being relied on. While NZDF supports Objective PINF-O1, the policies implementing this objective are narrowly framed and

focus on the National Grid and gas transmission infrastructure. In this respect, the policy only partly implements the objective i.e. only for the infrastructure specifically identified.

In order to give effect to the recent national direction established through the NPS Infrastructure, NZDF requests the inclusion of a new policy to address reverse sensitivity effects on infrastructure broadly as follows:

PINF-PX: Reverse sensitivity

Avoid activities that would compromise the safety and efficient operation, maintenance, upgrade or development of infrastructure, including through reverse sensitivity effects.

Alternatively, the wording of PINF-P1 could be amended to broaden its application and address reverse sensitivity effects on other non-linear infrastructure:

PINF-P1 Protecting regionally significant infrastructure

Regionally significant infrastructure is protected from incompatible new subdivision, use and development by:

1. *Avoiding activities that would compromise the safety and efficient operation, maintenance, upgrade or development of regionally significant infrastructure, including through reverse sensitivity effects.*
2. *Avoiding the location of activities sensitive to hazardous substance risk within a defined risk management overlay.*
3. *Avoiding activities sensitive to the National Grid, and controlling buildings, structures and earthworks within a defined National Grid Yard.*
4. *Controlling subdivision within a defined National Grid Subdivision Corridor.*
5. *Controlling subdivision, buildings, structures, earthworks and activities sensitive to gas transmission infrastructure within a defined Gas Transmission Pipeline Corridor*
6. *Controlling noise sensitive activities within a defined Highway and Railway Noise Overlay.*

If the Hearings Panel considers it useful for NZDF to appear before the Panel to explain or answer any questions on the matters above, it would be happy to do so.

Yours faithfully,



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