

21 August 2025

Palmerston North City Council
32 The Square
Palmerston North 4410
C/- McKayla Jaggard, Hearings Administrator
Via email: mckayla.jaggard@pncc.govt.nz

Attention: Hearings Panel

PALMERSTON NORTH CITY DISTRICT PLAN – HEARING ON PROPOSED PLAN CHANGE I (INCREASING HOUSING SUPPLY AND CHOICE)

A. The New Zealand Defence Force (NZDF) is a submitter (SO202) on Proposed Plan Change I to the Palmerston North City District Plan (PCI). NZDF does not intend to attend the hearing on PCI, but requests that this letter be tabled with the Hearings Panel.

B. NZDF has military interests throughout New Zealand including the Linton Military Camp in Palmerston North. NZDF may also undertake Temporary Military Training Activities (TMTA) in zones throughout Palmerston North City to meet statutory purposes under the Defence Act 1990.

C. NZDF supports the recommendation made by the Reporting Officer in the Section 42A Report in relation to applying Residential Zone provisions for TMTA in the Medium Density Residential Zone (submission point SO202.1).

D. This letter addresses NZDF's submission points on reverse sensitivity effects within the Medium Density Residential Zone (submission points SO202.2 and SO202.3). NZDF acknowledges discussions with Palmerston City Council staff regarding matters raised in NZDF's submission.

1. NZDF facilities

- 1.1 The area proposed to be zoned Medium Density Residential under PCI is located approximately 1.6 km from Linton Military Camp. Linton Military Camp is the largest New Zealand Army base in the country. It is a hub for Army activity with more than 200 personnel based there. Activities at the site include physical training, weapons training, fieldcraft, and leadership development courses.
- 1.2 Regarding reverse sensitivity effects, existing lawfully established Defence facilities such as the Linton Military Camp can have effects (including noise) which extend beyond physical boundaries and associated designation boundaries, and in the case of some of the noisier aspects of activities (e.g. weapons training and fieldcraft), extend beyond "adjacent" land.
- 1.3 Part 2 of the Horizons Regional Council One Plan 2014 sets out the Regional Policy Statement (RPS) for the Manawātū-Whanganui Region. The RPS requires territorial authorities to recognise New Zealand Defence Force facilities as physical resources of

regional or national importance (Policy EIT-P1). Due to the importance of the Linton Military Camp, this facility needs to be appropriately protected from adverse effects associated with new development, including reverse sensitivity effects which have the potential to curtail or constrain activities at the Linton Military Camp. This is necessary to give effect to Objective EIT-O1 and Policy EIT-P2 of the RPS, as well as Objective UFD-O3 and Policy UFD-P4 which are directly relevant to urban form and development.

- 1.4 Relevant RPS provisions are set out in Appendix A. In summary, the RPS requires that the operation of physical resources of regional or national importance such as the Linton Military Camp must be recognised and provided for, and not compromised by adverse effects (including reverse sensitivity effects) arising from other activities including urban intensification. The broad policy direction of the RPS is that:
- a. such effects should be “**avoided as far as reasonably practicable**”; and
 - b. the operation, maintenance and upgrade of nationally significant infrastructure, and physical resources of regional or national importance “**is not compromised**”.

2. Objective MRZ-O5

- 2.1 NZDF seeks to amend Objective MRZ-O5 to ensure appropriate protection of infrastructure and physical resources of regional or national importance, such as the Linton Military Camp, from reverse sensitivity effects associated with intensification within the vicinity of this facility (SO202.2).
- 2.2 Specifically, NZDF’s submission seeks the rewording of the objective to require avoidance of adverse effects rather than mitigation (consistent with the RPS direction discussed above), deletion of the term “adjacent”, and reference to “infrastructure and physical resources of regional or national importance” consistent with the wording of RPS Policy EIT-P1 (Appendix A).
- 2.3 The section 42A Report recommends retaining reference to “mitigation” and “adjacent to infrastructure”, but adding “and existing lawfully established non-residential activities” as follows:

MRZ-O5 Mitigate effects of development adjacent to infrastructure and existing lawfully-established non-residential activities

Mitigate the adverse effects, including reverse sensitivity effects, of subdivision, use and development which is located adjacent to infrastructure and existing lawfully-established non-residential activities.

- 2.4 NZDF supports the addition of the wording “and existing lawfully-established non-residential activities” and considers that it goes some way to addressing the concerns set out in submission point SO202.2 (as this would encompass the Linton Military Camp).
- 2.5 However, NZDF does not support MRZ-O5 being limited to “mitigating effects” of development which is “adjacent” to these established activities. NZDF considers that this does not adequately give effect to the RPS which requires that adverse effects are avoided in the first instance (Policy EIT-P2) and does not reflect that reverse sensitivity effects are not necessarily limited to adjacent land. Rather, NZDF considers that the focus

of the provisions should be on avoiding reverse sensitivity effects and it is unnecessary to apply a proximity requirement.

- 2.6 Accordingly, NZDF requests that MRZ-O5 is amended as follows, with additions shown as underlined text and deletions shown as ~~striketrough~~ text against the section 42A Report version:

MRZ-O5 Avoid and mitigate effects of development adjacent to on infrastructure and existing lawfully-established non-residential activities

Avoid where practicable, and otherwise mitigate the adverse effects, including reverse sensitivity effects, of subdivision, use and development which is located adjacent to on infrastructure and existing lawfully-established non-residential activities

- 2.7 NZDF considers that this better gives effect to the direction established through the RPS and ensures a more appropriate application of this policy approach in relation to reverse sensitivity effects.
- 2.8 NZDF's request to delete the term 'adjacent' was accepted in relation to Policy MRZ-P11 and a revision to the policy heading drafting was recommended by the section 42A Report author to address this matter (as set out in Section 3 below). For consistency, NZDF considers the equivalent change should also be made to Objective MRZ-O5 as set out above.

3. Policy MRZ-P11

- 3.1 NZDF seeks similar amendments to the wording of Policy MRZ-P11 i.e. to avoid adverse effects in the first instance, and to better recognise and manage the reverse sensitivity effects of development and noise sensitive activities on existing infrastructure (SO202.3).
- 3.2 The section 42A Report author agreed with the requested revision regarding the 'adjacent' text and recommended clarifying the policy heading "to make it clear this policy applies to the effects of buildings and activities on infrastructure". NZDF supports this amended wording and considers that objective MRZ-O5 should be amended in the same manner.
- 3.3 However, NZDF requests that MRZ-P11 is further amended to reflect the RPS policy direction, with additions shown as underlined text and deletions shown as ~~striketrough~~ text against the s42A version:

MRZ-P11 Effects on of buildings and activities ~~near on~~ infrastructure and existing lawfully-established non-residential activities

Manage the effects on of new or altered buildings and noise sensitive activities ~~near on~~ existing infrastructure and lawfully-established non-residential activities to ensure their operation is not compromised, including by requiring:

1. Appropriate setbacks and design controls where necessary to achieve appropriate protection of infrastructure and lawfully-established non-residential activities and mitigation of effects on adjacent noise sensitive activities.

...

3.4 NZDF considers that this better gives effect to the direction established through the RPS and ensures a more appropriate application of this policy approach in relation to reverse sensitivity effects.

4. New definition of reverse sensitivity

4.1 The section 42A Report recommends the inclusion of a definition of the term “reverse sensitivity effects”. As this term is used in MRZ-O5, NZDF wishes to ensure the definition is appropriate and accurate.

4.2 NZDF considers that the recommended definition does not fully capture all elements of reverse sensitivity effects as reverse sensitivity effects can arise not only from those activities that are “adjacent” to noise generating activities but can also arise from noise-sensitive subdivision and development located further away (for example, noise generated by airfields, rifle ranges, highways, rail corridors etc.).

4.3 NZDF considers the definition as currently proposed is unnecessarily complex and difficult to understand. Accordingly, NZDF requests that the definition of ‘Reverse Sensitivity Effects’ is replaced with a new definition as follows (or wording to similar effect):

Reverse Sensitivity Effects

~~means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained.~~

The potential for an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment, intensification, or alteration of another activity that may be sensitive to the adverse environmental effects generated by the existing lawfully established activity.

5. Closing

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. Please contact Rebecca Davies on 021 445 482 or rebecca.davies@nzdf.mil.nz.

Yours faithfully,



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Appendix A - Horizons Regional Council One Plan (Part 2) RPS Provisions

Objective EIT-O1: Infrastructure and other physical resources of regional or national importance

Have regard to the benefits of infrastructure and other physical resources of regional or national importance by **recognising and providing for their establishment, operation, maintenance and upgrading.**

Policy EIT-P1: Benefits of infrastructure and other physical resources of regional or national importance

...

2. The Regional Council and Territorial Authorities must recognise the following facilities and assets as being physical resources of regional or national importance:

...

c. **New Zealand Defence Force facilities.**

Policy EIT-P2: Adverse effects of other activities on infrastructure and other physical resources of regional or national importance

The Regional Council and Territorial Authorities must ensure that adverse effects on infrastructure and other physical resources of regional or national importance from other activities **are avoided as far as reasonably practicable**, including by using the following mechanisms:

1. Ensuring that current infrastructure, infrastructure corridors and other physical resources of regional or national importance, are identified and had regard to in all resource management decision-making, and **any development that would adversely affect the operation, maintenance or upgrading of those activities is avoided as far as reasonably practicable**,

...

Objective UFD-O3: Urban form and function

The intensification and expansion of urban environments:

1. contributes to well-functioning urban environments that:

...

f. manage adverse effects (including reverse sensitivity effects) to ensure that the operation, maintenance and upgrade of nationally significant infrastructure, and physical resources of regional or national importance **are not compromised**.

...

Policy UFD-P4: Urban intensification and expansion

1. Intensification and expansion of urban environments is provided for and enabled in district plans where:

...

f. the operation, maintenance and upgrade of nationally significant infrastructure and physical resources of regional and national importance **are not compromised**, and

...