

Before the Independent Hearing
Commissioner

Under the Resource Management Act 1991 (**RMA**)

And

In the matter of A Plan Change request under clause 21(1) of Schedule 1 of the
RMA by the Rangitikei District Council in respect of the
Operative Rangitikei District Plan

Reply of Interested Residents of Marton and the Rangitikei (IRO-MAR)

6 July 2020

Introduction

- 1 This reply is given on behalf of the IRO-MAR on the proposed re-zoning from rural to Industrial Plan Change.
- 2 The reply addresses Mr Carlyon's right of reply dated 26 June 2020 which proposes amendments to the plan change as set out at paragraph [2] of the Commissioner's 7th Minute.
- 3 Despite Mr Carlyon's proposed amendments, IRO-MAR still opposes the Proposal due to the reasons stated in its original evidence presented at the hearing and because overall:
 - (a) There is no demand or shortage of industrial land in Marton.
 - (b) The proposed change of use is not suitable for this LUC2 land.
 - (c) The effects on the residents of Marton and the Rangitikei are not adequately provided for by reducing the scale of the proposal.
- 4 Further elaboration on why the proposal is still inappropriate are given below.

Reduction in Total Area to 40ha

- 5 No evidence has been submitted to the community or to the Commissioner that provides an assessment of the scale, nature and environment effects of the proposed development by NZ BioForestry.
- 6 Due to extensive effects and concerns of the community, this Proposal is now reduced to 40ha. IRO-MAR assumed this amended proposal would be accompanied by an extensive assessment of effects however, this has not occurred.
- 7 A large industrial area as proposed is incompatible with the nature of our small rural service town such as Marton. Marton instead is a community based on food production. There is no shortage of industrial land in the district and therefore, the amended proposal is not appropriate.

Effects of Amended Proposal

- 8 The landscape and visual amenity of our small rural town will be significantly altered, and our identity, especially for all travellers along SH1, will be changed and dominated by an industrial development if the proposal as amended goes ahead.
- 9 The amended proposal will:

- (a) Not enhance the existing Malteurop NZ buildings. Rural sheds and silos are set sparsely within the country landscape, not grouped as a mass.
 - (b) Compromise the open character of the lower Rangitikei terraces.
 - (c) Result in a loss of highly productive soils. The proposed land is accessible, it enjoys full sun in a moderate climate and contributes to the productive pastoral landscape. If this land is rezoned industrial it will be lost to future generations.
 - (d) Cause a significant increase in traffic including heavy logging trucks. This proposal does not account for the impact on local road users, on young rural drivers, fire and emergency services, cyclists and how additional loads created by out of town workers travelling to and from home to work will pollute the environment. The cost to the town of maintaining such a large network of country roads and bridges is significant.
- 10 Furthermore, the impact this proposal (as amended) will have on us Marton residents is still significant and should not be understated. Marton residents live in a quiet valley near a beautiful river, surrounded by countryside. We are concerned that our natural environment will be damaged. We are concerned that air and noise quality will be negatively affected by the amended proposal.

Inadequate Information

- 11 The proposed 40ha Industrial Development Capacity Area still requires extensive further investigation and expert assessment before it can be considered.
- 12 In particular, there needs to be further assessment of:
- (a) The appropriateness of the amended proposal given:
 - (i) There is no shortage of vacant industrial land in Marton.
 - (ii) There is no evidence the Rangitikei has large unemployment. The unemployment rate has been below the NZ national rate since 2002.
 - (iii) This land is classified LUC2 meaning it is valuable soil for agriculture and horticulture. The loss of this land will not be able to be restored.
 - (b) Options for where such an industrial zoning could go:

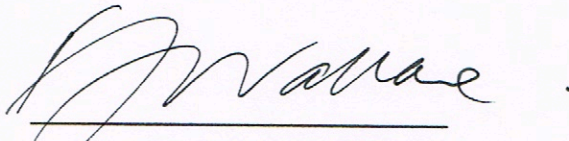
- (i) MPI recommends NZBF should partner or collocate with other like industries in other regions.
 - (ii) Industrial areas are incompatible/not suited with existing residential land use.
 - (iii) Cost/Benefit analysis of options needs to be provided prior to any land use change.
- (c) Whether this is the most appropriate location for industrial land use. In particular:
- (i) Can stormwater and infrastructure generally cope and be appropriately managed on the site in the manner the RDC proposes?

13 There is also a lack of an overall structure plan and long term planning by the RDC for the amended proposal:

- (i) Mr Carlyon since November 2019 has proposed a series of altering options for this plan change without any consultation or full discussion with the community regarding the costs and benefits to the community. The planner's responses have continually changed so that we have lost count of the number of proposals put forward by RDC. This includes the new proposed amendments by Mr Carlyon.
- (ii) NZ BioForestry have not provided any details that would allow assessment of the nature of the amended proposal. The drawings provided at the hearing are diagrammatic and generic: these drawings could be anywhere; the scale cannot be clearly read. Colour blocks are used to suggest plan arrangements. The 3 dimensional image has no relation to a specific site plan or orientation. There is no indication of vehicle access and turning requirements, no idea of the foundations or excavation required. These are basic requirements for assessing the infrastructure needed. There are no details of the industrial processes proposed.
- (iii) This amended proposal is plagued by a lack of vision and long term planning. Making such a significant re-zoning change in response to a development proposal is the wrong way around. The amended proposal is not supported by the fact that:

- (1) Wood processing and Forestry are not identified as one of the 6 growth areas for the Rangitikei via Accelerate 25. This lack of adherence and commitment to actioning existing regional strategies and the current LTP is of real concern.
- (2) RDC are promising that rules and policies will be changed but there is no cost/benefit analysis provided to the community to justify this, or the impact these amendments will have.
- (3) With regard to Greg Carlyon's Right of Reply dated 26 June 2020: New Industrial Policy A1-5.7, the RDC is so disorganised that while one arm of the council is promoting a land use plan change that would allow a single use bio plastics factory to be constructed on LUC2 land adjacent to Marton residents; the Project Marton newsletter dated 2 July 2020 states "Plastic Free July is here and this is your chance to be part of the solution to plastic pollution- so we can have cleaner streets, oceans and beautiful communities. Will you be part of Plastic Free July by choosing to refuse single -use plastics?"

Dated this 6th day of July 2020.



Felicity Wallace on behalf of IRO-MAR