

Rangitikei District Council

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FORM 5 – SUBMISSION ON PROPOSAL TO CHANGE THE RANGITIKEI DISTRICT PLAN

Proposed zoning of 217 hectares of rural land near Marton to industrial

Clause 6 of the First Schedule, Resource Management Act 1991

SUBMITTER/S DETAILS

Full Name **ROBERT SMYDERS**

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MARTON**

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Contact Person

Address

Phone Number
(if different from above)

RECEIVED

23 SEP 2019

To: **MH**

File: **1-PL-2-9**

Doc: **013**

SUBMISSION

☐ I support the application

☒ I oppose the application

My submission is (specific parts of the plan change proposal; whether you wish to have the proposal amended; the reasons for your views)

Please see attached
document

(continue on a separate sheet if necessary)

I seek the following decision from the Rangitikei District Council (give precise details)

Please see section 4
of the attached document

☒ I wish to be heard in support of my submission

☐ I do not wish to be heard in support of my submission

☐ If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature



Date 23/9/19.

(Person making the submission, or the person authorised
to sign on behalf of the person making the submission)

A signature is not required if you make your submission by electronic means.

Please make sure the submission is received by the Council before the due date – i.e. 23 September 2019, 5.00 pm.

Note:- Copy to be sent by
email.

SUBMISSION DETAILS in respect of:

Proposed District Plan Change for rezoning at 1165,
1151, 1091 State Highway 1, Marton from RURAL to
INDUSTRIAL

by:

Robert Snijders

of 5 Grey Street, Marton 4710

phone: 0210 410001

email: moolookiwi@outlook.com

Note: This document is written to support FORM 5

1.0 Introduction

The Rangitikei District Council propose to change the District Plan rezoning 216.6 hectares of Rural Land to Industrial Land at 1165, 1151, 1091 State Highway 1, Marton.

The justification for the proposal cites the following reasons:-

- Regional and Central Government studies and strategy,
- Rangitikei District Councils' LTP, and
- Having a supply of suitable land.

2.0 Consultation Document

The consultation document detailed the following: -

- Growth in the District is well below the national value,
- Land is required to deal with the forestry activities in the surrounding area and refers to Kinleith Mill which occupies 150 hectares as an example. *Comment : This site serves forests that are well established in the immediate vicinity and extending out to Rotorua and Taupo. In addition, Kinleith contains numerous support services, storage, an electricity generation plant, and processing facilities. The magnitude of the forestry operations is clearly visible from Google, however, around Marton the land is predominantly agricultural.*
- The Waingawa Industrial Estate near Masterton, whilst large is subdivided up in to a number operations. *Comment: There are timber processing plants, a rail siding for log transport and other activities including a Higgins Depot and Quarrying activities. The Estate is relatively new and serves a large geographic area. The next nearest estates would be those of Palmerston North and the 'Hutts'.*
- Marton has very little industrial land of suitable size to accommodate large scale industrial activities.
- Traffic and Transport – Very little information is provided on this topic and whilst reference to a document titled "Projected Traffic Volumes", it was not attached to the consultation document.
- Service Infrastructure for the land is nearby, however, there would need to be upgrades carried out by the District Council and consents from the Regional Authority.

- There will be issues in respect of Geotechnical, Environmental (Flooding, Odour, Lighting and Ecology), Landscape and Earthworks. The conclusion from the document that the current District Plan Rules will regulate these accordingly.
- At present the land generates very little employment, 12 full time equivalents (FTE) is quoted. Turning over the land to Industrial use would increase this to between 1800 and 2400 FTE jobs.

3.0 Reasons for Objection

3.1 The consultation document does not provide adequate detail to simply allow the rezoning of the land. The Resource Management Act describes “*sustainable management*” as:- managing the use, development and protection of natural and physical resources in a way, or at a rate which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while -

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystem; and
- (c) Avoiding, remedying or mitigating any adverse effects of activities on the environment.

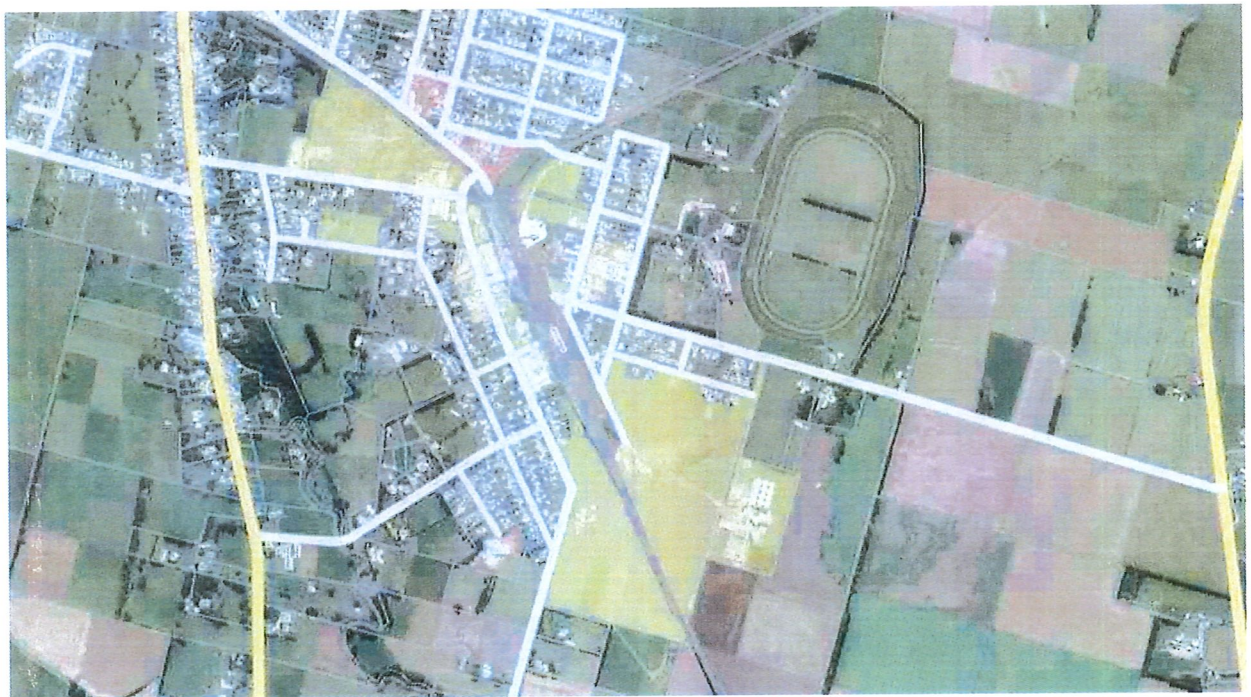
A detailed development plan should accompany the rezoning which contains site specific ‘rules’ in addition to the District Plan Rules to ensure the principles of sustainable management is respected. Examples of these ‘rules’ are as follows:-

- Categorizing industrial activities so that rules relating to buffers between adjacent development are defined and this would include residential and recreational activities,
- Ensuring that buffers are in place to screen development from the existing environment,
- Strict guidance on how sewage and surfacewater are dealt with on site,
- Existing features such as watercourses and water bodies to be retained with margins to ensure their protection,
- A percentage of the energy used should be renewable and generated on site.

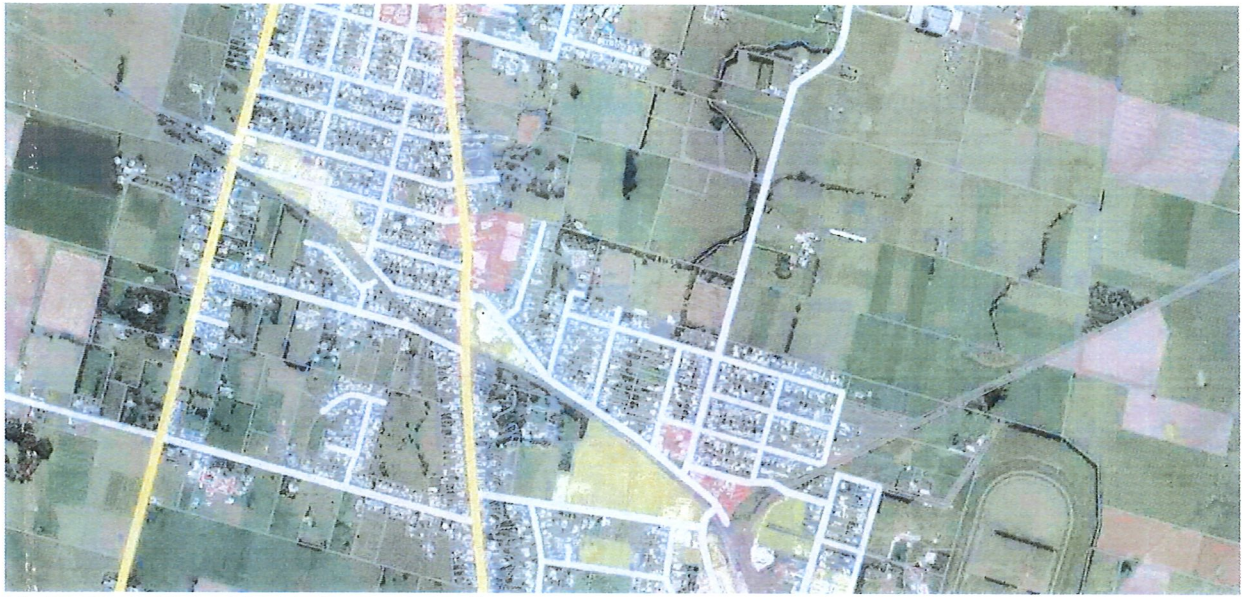
3.2 Marton was defined in the consultation document as having insufficient industrial land. Below is an extract of the District Plan highlighting Industrial Land in yellow.



Below are two extracts of the District Plan with the zoning and aerial maps overlaid.



SH1 to Railway Junction



Pukepapa Road to Railway Junction

Most of the land shaded yellow is either underutilised, undeveloped or derelict. Below are photos of some of that land:-



Russell Street



Hatuma Lime from the railway siding



King Street (towards Malteurop)



Railway siding (Station and Nestle in the distance)



Kensington Road (Derelict Council Land)



Kensington Road/King Street

This land has remained in this condition for considerable time. The council owned site on Kensington Road (approximately 5 hectares) was once part of a larger timber processing plant. Priority should be placed on the redevelopment of these sites before 'green' fields are brought in to use.

- 3.3 The consultation document cited the need for large sites in respect of distribution. The 'El Prado' Industrial Estate near Palmerston North Airport is approximately 92 hectares in area. The 'Foodstuffs' distribution centre is a little less than 10ha in area and there are vacant lots on the estate. In Feilding at the Kawakawa Road Industrial Estate the average site is approximately 2 hectares. There are also vacant sites. This suggests that there is over supply of industrial land in and around Marton and the Rangitikei District as a whole. Whanganui also has capacity for Industrial Development.
- 3.4 On State Highway one (SH1) near the junction of Calico Line there is a height restriction of 4.4m. This means that vehicles over this height must travel via Calico Line, Nga Tawa

and Wings Line. This route is primarily through residential and recreation areas and past an established private school.

Development of 216 hectares of rural land will result in a significant increase of trucks using the bypass to avoid the height restriction.

- 3.5 ANZCO have developed a site near Marton and Bulls on SH1 at the intersection of Wellington Road. ANZCO own approximately 147 hectares of land, however, the factory with associated parking, storage and access is approximately 6 hectares. If proposed industrial uses that are land hungry are required then let these be dealt with on a case by case basis to better mitigate the effects of that development.
- 3.6 SH1 and the Railway runs right through the middle of the district from north to south and along the bottom from east to west. The district enjoys easy access to all the main centres and further afield. Throughout the district there are examples of derelict industrial land, most of them located adjacent to the railway.
- 3.7 In summary, Marton currently has significant amounts of 'zoned' industrial land available for use some of which borders the railway and already has sidings. The priority for the District Council is to steer those requiring land to these sites first.

In my opinion there is no evidence in the consultation document to support the notion that there is only a need for large sites in district when there appears to be over supply in the region.

4.0 An Alternative Policy/Dealing with my Objection

- 4.1 All those in that live in the Rangitikei are supportive of seeing the district thrive. In my opinion, the economic decline as result of the closure of significant labour hungry businesses and 'Lake Alice' have hobbled the districts growth ever since. This is evident

in the GDP growth figures for the district versus the nation. It is also evident in the housing stock. Grabbing productive agricultural land in order to entice industrial operators when so much already lies derelict does not follow the spirit of sustainable development.

4.2 In order to address the issue of bringing the existing industrial land in to use a SEQUENTIAL TEST should be developed which steers operators and businesses towards this land before rural land is sacrificed for industrial use. The TEST would need incorporate for example :-

- the type/class of use, i.e. clean or dirty, quiet or noisy,
- area required,
- hours of operation,
- traffic generation,
- impact on visual amenity,
- impact on residential and recreation activities,
- demand on infrastructure services, and
- other environmental considerations such as cohabiting in a flood zone and/or odour and noise.

4.4 With the SEQUENTIAL TEST the Rules and Policies of the District Plan will need to be reviewed. In my opinion, these are due review due to the age them and the move now towards carbon zero policies. The review should look to:-

- Assess what development can cohabit together, i.e office and light industrial adjacent to residential,
- Buffer zones between types/class of development,
- Placing infrastructure demanding development near existing services, for example residential and office uses,
- Warehouses which have low demand for sewage and water can be located further away as employee numbers are low for this use,
- Incorporate renewable energy,
- Rainwater harvesting,
- Mitigation measures required where surface water runoff is increased for example,

- Transportation, in particular, any restrictions on the network such as the heights of loads. SH1 may need improvements.
- Improved access templates to mitigate against large vehicles using the opposite side of the road to gain access to their development.

4.5 The District Plan Maps will also have to change to incorporate land use based on the Rules and Policy review. Larger cities already illustrate what land can accommodate higher density housing for example, in the Rangitikei only minimum lot size is prescribed.

4.6 Any development that needs to be placed on rural land should go through the process of Resource Consent that is publicly notifiable. This will create public involvement and better outcomes.

4.7 Finally, the Development Contributions Policy needs to be reviewed so that where new land is 'brought in to play' or existing intensified the developer bears the cost for reinforcing services and infrastructure to accommodate his development. Currently, the ratepayer shoulders those costs.