

23 September 2019

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PAT:MLB

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By email only: info@rangitikei.govt.nz

Dear Michael

RANGITIKEI DISTRICT COUNCIL PLAN CHANGE

Thank you for the opportunity to make a submission on Rangitikei District Council's (RDC) Proposed Plan Change for rezoning at 1165, 1151 and 1091 State Highway 1, Marton.

Horizons Regional Council (Horizons) generally supports the Proposed Plan Change or any further, alternative or consequential relief that achieves the same outcome, as these proposals are considered consistent with the issues, objectives and policies of the One Plan¹, and/or matters for the territorial authority.

At Horizons, we have a key role in making the region a great place to live, work and play. Our responsibilities include managing the region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

In terms of environmental planning, our integrated planning document, the One Plan sets out four keystone environmental issues for our region – surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened indigenous biodiversity.

Regionally, the Accelerate25 programme identifies a number of opportunities and key enablers to help realise our Region's economic potential. The action plan sets out a path to grow our regional prosperity between now and 2025. An expected outcome of the Accelerate25 programme is to see managed urban growth and increased economic activity on our region.

Horizons does not consider it would gain an advantage in trade competition through this submission.

¹ Manawatū-Whanganui combined regional policy statement (RPS), regional coastal plan and regional plan

Horizons' submissions to district plan changes generally consider the relationship between Horizons' One Plan, and the need for district plans to give effect to the regional policy statement components and not be inconsistent with regional plan provisions, as set out in section 75 of the Resource Management Act 1991 (RMA). We acknowledge that the proposed plan change to rezone land at Marton from Rural to Industrial Zone does not include any amendments to existing Industrial Zone objectives, policies or rules. These and other applicable provisions (such as those relating to natural hazards) are considered to meet the requirements of section 75 RMA, tested through the plan development process.

We also note that the proposal is intended to provide development capacity for large-scale industrial activities in the district, in a location close to existing transport routes and infrastructure service networks. Horizons understands that this reflects RDC's strategic focus on increasing industrial activity Marton, as part of its approach to economic development for the district. This approach is considered consistent with One Plan Policy 3-4: *The strategic integration of infrastructure with land use* insofar as it is a proactive development and implementation of a land use strategy to manage urban growth, aligned with existing infrastructure networks. However, we note that the proposal does not include asset management planning to service the area and there is no mention of this type of growth in RDC's current Financial and Infrastructure Strategy (Section 2 of the Long-Term Plan 2018-2028). While we acknowledge that this plan change is out of step with long-term infrastructure planning required by the Local Government Act 2002, development of a structure planning approach for the site would address this issue in the interim.

We consider that, through section 6. 1 of the section 32 report, RDC has given effect to Policy 3-5: *Urban growth and rural residential subdivision on versatile soils*, which states:

In providing for urban growth (including implementing Policy 3-4)... Territorial Authorities must pay particular attention to the benefits of the retention of Class I and II versatile soils for use as production land in their assessment of how best to achieve sustainable management.

Horizons considers that the summary of geotechnical and natural hazards in section 6. 4 of the section 32 report is an accurate reflection of the advice and information provided. This includes identifying the additional technical advice that will be needed to ensure the existing district plan provisions can continue to give effect to the One Plan's natural hazards policies to avoid or mitigate the effects of natural hazards on people, property, infrastructure and the wellbeing of communities.

In summary, Horizons generally supports the Proposed Plan Change insofar as it gives effect to the relevant One Plan Regional Policy Statement provisions, in particular around urban growth and natural hazards (or any further, alternative or consequential provisions that achieves this outcome). We acknowledge the proposed land use change is part of RDC's strategic response to the Accelerate25 regional economic development programme.

Horizons reserves the right to be heard in relation to this submission. If others make a similar submission, Horizons would consider making a joint presentation to the hearing panel.

Yours sincerely,



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SENIOR POLICY ANALYST

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