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

Comments in respect of Minute #7 dated 30th June 2020 by Robert Snijders, 5 Grey Street, Marton

- 1) Reducing the total area to be rezoned to 40ha with the remainder retained as a Buffer Zone, comments are as follows and are in no particular order:-
 - Is this development by stealth? Will pressure be placed on the retained land to be developed if space is not sufficient for the activity proposed on the 40ha?
 - Now that 40ha is considered a possibility, are there more suitable sites that already have the capacity to absorb an industrial activity such as Tangiwai, Rata or the Rail Hub in Palmerston North which will have a log hub.
 - Reducing the size does not relinquish the requirement to provide adequate supporting documentation, i.e Ecology, Acoustic, Hydrology, Landscape, Traffic et al.
 - There is no topographical data on how the site will be developed, i.e. relationship between railway and site. A landscape plan will go part of the way in dealing with this issue.
 - A detailed Masterplan is required that is driven by the various 'expert reports'. A new Wetland is proposed, however, no details are provided on how the existing watercourses will be dealt with that lie between the proposed wetland and the rail line.
 - The remaining land is set to be a buffer between development and SH1, what buffers will be implemented between town and development?

- Economic benefit is for the region and districts should not be in competition with each other (*Accelerate25 chaired by Horizons*).
 Marton would not miss out as there would be a demand for housing because Palmerston North and Feildng struggle to keep up with demand. Given that around 80% of jobs will be filled from outside the district then other sites near where employees will be housed should be considered.
- Greg Carlyon's 'right of reply' discussed the size of a wetland area which is based on an arbitrary number. The true impact of the development can only be assessed by carrying out correct hydrological studies which, in my opinion, will certainly result in a larger wetland area. The objective of the study is to ensure that there is no increase in flow or pollutants leaving site boundary, in fact 'betterment' is the target.
- The wetland area is located outside the 40ha, however, it will serve the development. Then, logically, the area set aside for development should include all land required for mitigation measures.

2) Counsel Reply

- Counsel states that the commissioner could ask for more information, however, at what cost to the ratepayer and potential delays caused. This should not distract the commissioner from ensuring that correct information is available according to the quantum and type of development. Rural to Industrial should command detailed assessments, light industrial to heavy industrial less for example.
- Counsel states that submitters asked that the developer should pay
 for upgrades to infrastructure, however, the RDC has a policy of not
 requiring 'development contributions'. This policy came in to effect in
 May 2018 and was based on the fact that there was little or no
 development in the district at the time. This has changed significantly
 and should be reviewed. Rates are for the services council provide.
 The LTP is a mechanism for obtaining money for other expenditure

such a council buildings, new infrastructure and promoting development for example.

3) Objectives and Policies

- Any new district plan policies should allow more time for submitters to comment. Council has the benefit of ratepayer money to hire professionals to support, however, the submitters who are also ratepayers and in fulltime employment should be granted more time to comment and hopefully comment collectively through legal counsel.
- There are <u>plenty of descriptive words</u>, however, this is not supported by adequate expert information required to develop the policies, mitigation measures and detailed drawings for the development.

4) Summary/Conclusion

The principles of local government include:-

- openness and transparency
- democratic accountability
- > implementing desired outcomes effectively and efficiently
- > being aware of community views
- > taking the long-term view
- recognising diversity
- > providing Māori with opportunities to contribute to decision-making
- working collaboratively with other authorities
- using sound business practice in commercial undertakings
- > being a prudent steward of assets
- > taking a sustainable approach.

Very few of these principles have been recognised in the approach that council has adopted in promoting the site.

Any decision on the development structure plan or undertakings should be delayed until

- > a full detailed assessment has been carried out of all the effects,
- > details of mitigation measures are provided,
- > and these are incorporated in to a pictorial masterplan.