

**Before the Hearings Commissioner at Marton**

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*Under:* The Resource Management Act 1991

*In the matter of:* Rangitikei District Plan

Proposed Industrial Rezoning Plan Change at  
1165, 1151, 1091 State Highway 1N, Marton

*and:* Manawatū-Whanganui Regional Council

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STATEMENT OF EVIDENCE LYNETTE BAISH

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## Introduction

1. My name is Lynette Ann Baish. I have been a Senior Planner at Horizons Regional Council since February 2017. I hold the qualifications of BA (Hons) and Master of Resource and Environmental Planning (Massey). I am a member of the New Zealand Planning Institute. I have worked in resource management planning for 12 years.
2. I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the code and am satisfied the matters I address in my evidence are within my expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

## Involvement in the Proceedings

3. Horizons have participated in key stages of the plan change process. I attended a submitters meeting held 26<sup>th</sup> November 2019 at the Council offices at Marton. Horizons Senior Policy Analyst, Pen Tucker, had prepared the submission on behalf of Horizons, dated 23 June 2020. Bryony Hall and Rebecca Tayler respectively attended the two pre-hearing meetings. Horizons did not make a further submission.

## Primary Issues for Horizons Regional Council

4. Horizons supports, in principle, the proposed zoning and plan change, or any alternative or consequential relief that achieves the same outcome, as the proposal is generally consistent with the objectives and policy direction of the Regional Policy Statement and the Regional Plan. The proposal is consistent with the existing suite of objectives, policies and rules for industrial land use and development contained in the Rangitikei District Plan, and as such, future development meeting the policy intent of the existing District Plan, would not be inconsistent with the Horizons Regional Plan.
5. As the Regional Council, Horizons key responsibilities concern the management and regulation of natural resources, protection and enhancement of biodiversity, responding to natural hazards and emergency events, flood control, the monitoring of air and water quality and facilitation of economic growth and regional land transport planning.
6. Horizons coordinates the Accelerate25 programme, which sets out an action plan to realise the region's economic potential. An expected outcome of this is to see

managed urban growth and increased economic activity in the region. I understand that the proposal to rezone land at Marton from rural to industrial, reflects the District Councils strategic focus on increasing industrial activity within this provincial hub, as part of its approach to economic development across the Rangitikei District.

#### Recognising Regionally Significant Infrastructure

7. The proposal would enlarge an existing industrial zoned area southwest of the township of Marton. The area proposed to be rezoned consists of two land parcels covering 216.6ha southwest of the town, an area with proximity to existing transport routes and infrastructure networks. The land is crossed by the North Island Main Trunk (NIMT) and is bordered to the east by State Highway 1.
8. The regional policy statement (One Plan), contains objectives for the strategic integration of infrastructure with land use, to ensure that urban development occurs in a strategically planned manner. It recognises physical resources of national and regional importance, and the benefits that can be derived from those resources. Policy 3-2 of the One Plan, provides that Regional Council and TLA's ensure that adverse effects on infrastructure and other physical resources of national and regional importance are avoided as far as reasonably practicable.
9. Some of the mechanisms to achieve this include ensuring that infrastructure corridors 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. Notwithstanding the clear recognition of the importance of the existing road and rail infrastructure in the vicinity, the proposal was somewhat lacking in detail in respect of effects, and any mitigation of effects on the state highway network and NIMT, although a Traffic Impact Assessment was eventually provided.
10. One Plan Policy 3-4 directs territorial authorities to develop and implement appropriate land use strategies to manage urban growth, and align their infrastructure asset management planning with these strategies to ensure efficient and effective provision of associated infrastructure. I acknowledge the new objective and policies proposed in the supplementary planning evidence (Policies A51.11 – A51.15) appear to go some way towards demonstrating the strategic alignment between the infrastructural assets and managed growth within the "Industrial Development Capacity Area." Horizons supports the proposed structure plan approach to ensure clear alignment of asset management with new urban

growth and associated infrastructure. I also acknowledge however, that the District Council does not appear to have factored this substantial zoning re-development into their long term financial planning or asset management plan.

11. It is also proposed to stage the zoning so that 40ha is initially designated as industrial in an area to the south of the site, located to the west to integrate with the NIMT. It is somewhat of a reversal for the District Council to consider that 216ha of industrial zone land is needed for growth and expansion and then to suddenly downscale the proposal to 40ha. Although I can see the benefits of a staged approach, the lack of information is disappointing; there is little detail to visualise what this development will look like for the community, or even how it would evolve, or be carefully planned for.
12. Horizons considers that a more detailed structure plan package, developed with the Marton community as well as other stakeholders, is essential for this zone change to be effectively and strategically planned and at the moment there is somewhat of a gap in this respect. Rather than deferring a structure planning exercise until a later stage, this planning should be conducted as whole exercise for the entire proposed area. A more considered and evidenced structure plan development process would alleviate any concentrated impacts on the road transport network and enable development effects to be better managed more generally.
13. I also consider the District Council needs to provide certainty its ratepayers and community, that the zoning plan change is purposeful in achieving industrial development beyond the initial 40ha as per the proposed site plan, and can enable incremental development particularly where critical infrastructure (three waters, utilities and roading) necessarily requires integrated planning and capital investment (for example quantifying anticipated increases in traffic volumes and required servicing capacity for each stage). Such detail would assist Horizons to better understand how the proposal would avoid, remedy or mitigate impacts on the operation of the NIMT and surrounding road transport network, and align with the Horizons Regional Land Transport Plan 2015 – 2025. Further, this would also provide utility as a regional planning input, to effectively plan for the impact on natural and physical resources from this industrial growth.
14. There is observed to be an increase in growth within several towns in the lower part of the Region, with population movement to the Rangitikei from Palmerston North and outside of the Region. The rezoning is part of the District Councils Long Term Plan intent “facilitating growth through infrastructure investment, an enabling

regulatory framework and collaboration”, and to develop Marton as a major freight and logistics hub. The rezoning of this proposed land is compatible with the opportunities available in the Region as set out in the Manawatū-Whanganui Regional Growth Strategy, and aligns with Accelerate25.

#### Geotechnical and Natural Hazards

15. The land that is subject to the plan change is currently rural land containing a mix of rural land uses. The site is outside of the 0.5% AEP flood levels and is on a terrace elevated above the level of the road and NMIT. There is a faultline in the vicinity, the location of which has been identified by WSP in their Geotechnical Report for the plan change.
16. I am of the view that the proposal avoids adverse effects by ensuring that the area of land identified as faultline, to the north of the site, will be located within the proposed buffer zone of 97ha. Within this buffer, policy direction would ensure that any development is low intensity, providing for rural production and light industry, and for conservation and amenity values. I am satisfied that the District Plan also contains objectives and policies to ensure that any built development would be suitably designed to avoid, remedy or mitigate any adverse effects associated with identified natural hazards in the area. I note also that the WSP report makes recommendations for future development of the site and that these have been adopted by the Council.

#### Other Matters

17. The land subject to the proposal is comprised predominantly of Marton silt loam structure, with soils classed as LUC II. It is understood that there are some deficiencies with seasonal moisture and a sub-surface pan which impedes drainage. The predominant land use within this area is arable farming and cropping, including for maize and silage.
18. The total area of LUC II land in the Rangitikei District is 36ha, of which the proposal comprises 0.6ha; the proposal occupies 2.8% of the total area used for arable farming in the District. The supplementary evidence of Councils planning expert contains a recommendation that an extent of 97ha of this land be utilised as a buffer for light industrial, rural and or conservation purposes, and that effects would be addressed through additional policy direction to ensure amenity and production values are provided for. This would leave 120ha of land zoned for industrial purposes, or 55% of the site, and further minimises the percentage of land taken out of production.

19. I agree with the section 42A report where it is stated that notwithstanding a zone change on the site, any future development must meet both the district plan standards, as well as One Plan consenting requirements for any discharge to air, land and/or water. That is a necessary, but entirely separate process to this initial plan change. Moreover, the permitted baseline for development and the regulatory standards that shape development for an industrial zone, including in relation to the use, storage, transport and management of hazardous substances, are more rigorous than those of the Rural zone – I agree with the view put forward by Council's planning expert that the weight of regulation intensifies in alignment with the level of development.
20. One Plan Objective 3-5 and Policies 3-8, 3-9, 3-10, and 3-11, set up a framework to manage and minimise waste generated in the Region, and to ensure it is disposed of appropriately. I also agree that the potential for effects associated with pollution or downstream damage generated by products of manufacturing enterprise generated from this site would be better mitigated with strengthened policy direction in the district plan. I support therefore the proposal to add New Industrial Policy A1-5.7 as per the supplementary evidence of the District Council's expert planner.
21. I would like to signal that in the case of major proposals for development within the industrial zone, Horizons would welcome the opportunity to undertake joint consenting processes with the District Council.

#### Conclusion

22. Horizons supports, in principle, this zoning and plan change. The supplementary evidence has gone some way to improve on the initial zoning proposal through the provision of additional policy direction informing a number of areas. However, the proposal falls short of providing a structure plan developed on the basis of a robust evidence and consultation. Horizons would support a more considered and evidenced structure plan development process applying to the whole area proposed to be rezoned.