

6 July 2020

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Michael Hodder
Community and Regulatory Services Group Manager
Rangitikei District Council
Private Bag 1102
MARTON 4441

Dear Michael,

RANGITIKEI DISTRICT COUNCIL PLAN CHANGE

On behalf of Horizons Regional Council, and in response to the further direction provided in Minute 7 of the Independent Commissioner, I submit the following comments in respect of the recommended changes to the proposal outlined in the Right of Reply of Greg Carlyon.

As outlined in the Statement of Evidence provided to the District Council on the 25th June, Horizons has signalled its support, in principle, for the proposed zoning and plan change. 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 I am satisfied that the additional policies proposed in the supplementary evidence, and confirmed in the right of reply, would ensure future development meeting the policy intent, would not be inconsistent with the Horizons Regional Policy Statement.

The key priorities for Horizons, includes ensuring that any adverse effects of development on physical resources of national and regional importance (including their operation, maintenance or upgrading) are avoided as far as reasonably practicable. We acknowledge that the District Council has work ahead of it to develop a strategic plan to manage industrial and other growth in a manner aligning with existing and future infrastructure/asset management planning.

Subsequent refinements of the proposal essentially reduce the area to be rezoned Industrial Development Capacity Area to just 40ha. The location of the 40ha land area, to the west of the site, would integrate with the existing NIMT and the proposed rail siding. In principle, the more compact scope of the proposal would ensure that effects, including development effects, are limited compared with the original proposal. However, the adjusted proposal fails to provide any certainty that the 40ha land area (noted as comprising just 18.4% of the site) would be appropriately sized to meet the needs of the community and of anticipated growth.

Horizons stands by its assertion, that development of a more detailed structure plan package is needed, based on community consultation, to ensure that any detailed design corresponds to the needs of the community and anticipated growth.

In my view, the discretionary activity status for industrial activities falls short of providing certainty for future developers, in particular as the industrial zoning has not been deferred until such a time as wider infrastructure planning has occurred. Without the more strategic planning of transport and three waters infrastructure, it would appear there is a disconnect between Council asset management and structure plan development and the ability for private developers to be able to make informed consent applications for land development.

I agree with the inclusion of the mandatory information requirements, and note the reference to joint consent processing between the regional and the district council.

Yours sincerely,



Lynette Baish
SENIOR POLICY PLANNER

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