

Attention:	Catherine Nichol
Company:	Boffa Miskell
Date:	28 September 2026
From:	Rob Smith, Development Manager for Rangitikei District Council
Message Ref:	Comments on Submissions Received on Proposed Plan Change 3 – Urban Growth

Qualification and Experience

My full name is Robert Trevor-John Smith. I am employed as Development Manager at the Rangitikei District Council (RDC). I hold a Diploma in Engineering (Civil) and I have over 20 years of experience in Civil Engineering and Project Management.

Throughout my career, I have undertaken a broad range of civil engineering responsibilities, including infrastructure design, construction and project management, asset management and development engineering.

In my current role at RDC, I provide engineering and technical advice on resource consent applications, engineering plan approvals and subdivision certification. This includes assessing proposed developments and associated infrastructure against relevant legislation, Council's bylaws, engineering standards and accepted engineering best practice, and recommending appropriate engineering consent conditions.

I have been employed by RDC as the Development Manager since 2024. Prior to this I was employed by the Manawātū District Council as a Development Engineer. As part of that role, I also provided development engineering services to RDC under a shared service arrangement.

Comments on submissions

You have asked me to comment on submissions received on Proposed Plan Change 3 from an infrastructure and development perspective. Below I comment on each submission point.

Sub Point	Submitter name	Issue	Provision reference	Support / oppose	Relief sought	Reasons	Recommendation
02.01	Al-lek and Michelle White	Infrastructure	Three Waters	Oppose	Delay the proposed rezoning and intensification until infrastructure capacity is proven and costings and timelines for upgrades are provided.	Opposes the rezoning of land and providing for greater intensification on the basis that current water, wastewater and stormwater infrastructure has long standing issues and increased demand on these systems is not appropriate when they are beyond their limits already. Also concerned that social infrastructure (i.e. schools and healthcare) cannot support hundreds of new dwellings without parallel investment.	At present, Council does not generally secure funding or developer contributions from developers towards infrastructure upgrades that maybe required because of their development. Instead, these infrastructure upgrades have typically been funded by Council. Development contributions are not charged by Council and instead Council has been using “Developer Agreements”. My understanding is that these agreements are generally focused on works Council will undertake, or contribute towards, to enable a development to proceed. To my knowledge these agreements have been infrequent, and there has not been one entered into since I became Development Manager in 2024. I have not been directly involved in establishing or negotiating a “Developer Agreement” and therefore I cannot comment in detail on the process by which they are developed or agreed. To my knowledge these agreements have generally been managed at General Manager and above level.
08.02	Teresa Stoltz	Infrastructure	Transport	Not specified	Seeks upgrades for Johnston [sic] Road.	Seeks improvements to Johnston [sic] Road to enable Johnston/Tutaenui vehicular access to MAR01 and MAR07. Walkways (including Ingle Walkway) require safety lighting to be installed.	For minor infill subdivisions, the wider roading network is not generally assessed in any significant detail. It is typically limited to the immediate effects of the development, such as the suitability and location of the vehicle access, available sight distances, separation from intersections and other vehicle crossings and compliance with RDC’s relevant vehicle access standards. For larger/greenfield subdivisions, we ask that their application is supported with a Traffic Impact Assessment and/or Road Safety Audit. These reports consider matters such as anticipated traffic generation, intersection performance, access arrangements, pedestrian and cyclist movements, road safety, internal road layout and the effects of the development on the surrounding network. These reports are also reviewed by the Roding Manager.
11.01	NZTA Waka Kotahi	Maps and zoning	Residential Intensification Areas	Amend	Seeking more information on the effect, funding and timing of intersection upgrades and potential caps on development (i.e. new dwelling or lot numbers), dependant on delivery of any identified intersection upgrades.	Concerned about effect of urban intensification on traffic volumes on the State Highway network and the need for changes to accommodate additional traffic demand including but not limited to intersections and lane widening. Notes that urban intensification may occur in advance of funding agreement needed to facilitate upgrades to numerous intersections as identified in the Integrated Transport Assessment. Seeking staging or sequencing of the development to ensure any necessary upgrades are in place or financed, prior to development.	This matter would be addressed by the Council’s Roding Manager and roading engineers. My involvement would generally be to provide input on anticipated development patterns, including where development and intensification are likely to occur, to assist with understanding potential future demands.
13.01	Hilary Powell	Zone Provisions	Site Area - GRZ-S5	Oppose	Oppose a 250sqm site area within the Residential Intensification Area.	Oppose the 250sqm site area due to wastewater and stormwater infrastructure’s ability to cope with more intense residential development. The submitter has provided their experience with stormwater/flooding. Notes this plan change will facilitate a change to the	Subdivisions are required to be hydraulically neutral. Overland flow paths are also considered as part of the consent application, with the applicant required to demonstrate that the development will either have no adverse effect on existing flow paths or provide appropriate measures to manage any identified effects.

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						dynamic of the community and strain health services, volunteer services and roads.	Council does not currently have any overall catchment management plan to guide these decisions. In my opinion, a catchment management plan should be developed in collaboration with Horizons Regional Council to provide a coordinated approach and clearer understanding of how this matter should be managed across the entire catchment.
27.04	Maree Marshall	Infrastructure	RDC 3 Waters Growth Strategy Growth Assessment	Oppose	Oppose the recommendations of the RDC 3 Waters Growth Strategy Growth Assessment (Appendix 12 of the s32 Report).	There needs to be more specific reports done once proposed developments are applied for to ensure network upgrades are accurate. Concerned about attenuation ponds and the risk of these being poorly designed and maintained which will have implications for the stormwater network and potentially increase flooding in the town. References the pond for the Bredins Line subdivision and the retention dam down Wanganui Road and the issues that these have. Has concerns for their own property which is adjacent a known flood hazard area and has potential to flood if stormwater / flood hazard is not appropriately addressed.	Assessments currently undertaken include pressure and flow testing of Council's water mains, along with general assessments of the wastewater network and contributing catchments. However, Council does not currently have detailed wastewater catchment maps available. For stormwater, new developments are generally expected to achieve hydraulic neutrality so that post-development runoff does not exceed pre-development runoff. A significant level of assessment is undertaken at the resource consent stage to determine the appropriate design and capacity of a stormwater detention pond. A wide range of information is considered, including local rainfall data, hydrological and hydraulic modelling, Horizons Regional Council flood modelling, information on known flood prone areas and existing drainage characteristics. These are just some of the factors that may be considered in preparing a comprehensive stormwater assessment to support a resource consent application, where the scale and nature of the subdivision warrants it. Detention ponds that receive stormwater from public roads and/or Council stormwater infrastructure are maintained by Council. However, detention ponds are a relatively recent addition to District Council's infrastructure with only a small number built over the past five years. As a result, Council has not yet established a formal policy setting out responsibility for their ongoing maintenance or how that maintenance should be funded. The transition to Central Districts Water adds a further consideration. My understanding is that land and assets used solely for stormwater infrastructure, rather than areas that serve a park or recreational function, are likely to transfer to Central Districts Water. In those circumstances, responsibility for determining future maintenance and funding arrangements for those assets would sit with them. The Wanganui Road detention pond referred to in this submission is owned by Horizons Regional Council and is managed in accordance with their own maintenance requirements and regime.
15.01	Fire and Emergency New Zealand	Zone Provisions	GRZ-R1	Amend	Amend as follows: GRZ-R1 1. Activity status: Permitted Where: All General Residential Zone	The Rangitikei District Plan does not contain any explicit provisions requiring the provision of a firefighting water supply. Instead, it relies on the Council's Subdivision and Land Development Code of Practice. This approach relies on there being a clear link between the District Plan and the Subdivision	For smaller two or three lot subdivisions, compliance with this is not generally required to be demonstrated. The main consideration at this scale is whether the proposed lots are located within an acceptable distance of an existing fire hydrant. I would be comfortable with this requirement being included in the District Plan, but it should be kept at a relatively general level such as a note, rather than tied to

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					Standards are complied with (refer to GRZ-S1 to GRZ-S78).	and Land Development Code of Practice, and there does not appear to be one. This gap presents a risk to Fire and Emergency operations. The submitter seeks an amendment to GRZ-R1, a new standard to be included in General Residential Zone, and the inclusion of an additional matter of discretion to allow Council to consider the extent of non-compliance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.	a specific standard. This would allow the relevant engineering standards or guidance to be updated over time without requiring a District Plan change each time the technical requirements are amended. Another reason I would recommend avoiding making the requirement too specific is that the firefighting standard is voluntary. Council is therefore not required to provide a particular level of service. If Council is unable to achieve a certain level of service in an area, or chooses to provide a lower level of service, I don't think it would be reasonable to require developers to meet a higher standard than Council itself is providing. Making the requirement more general would allow greater flexibility and avoid placing unnecessary requirements on developers where the existing Council network cannot support that level of service. The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 as such is a voluntary code and has not been formally adopted by RDC. Neither is there a corresponding performance measure in the RDC Annual Plan 2026-27 or previous Annual Reports. The future setting of levels of service and associated performance measures effective from July 2027 will sit with Central Districts Water (CDW) who may opt to revisit the current levels of service for RDC network reticulated towns. It is noted that the relief sought by FENZ references GRZ-R1 which refers to a General Residential Zone – Residential 1. Per DZ PAS 4509 (2026) draft version which was recently consulted on. Current expectations (per SNZ PAS4509:2008 S4.2 are “<i>The Fire Region Manager, in consultation with the WSA, shall establish the requirements of the reticulated water supply in accordance with table 2</i>”.
19.01	Ruth and Robert Snijders	Whole of PPC3	General	Oppose	Oppose PPC3 in full.	Seeks to oppose PPC3 in full due to current infrastructure being inadequate, poor condition and with no resilience during times of emergency. There is only one trunk [sic] main from the Tutaenui Reservoir to Marton and that the Marton wastewater improvements will take at least 10 years. No information has been provided about electrical, telecommunication or gas infrastructure. Concerns raised about the three waters infrastructure being able to accommodate the intensification areas. Notes that Marton has a reputation for poor water quality and that Bulls has issues with water pressure and how this has affected recent development. Indicates that most of the district's urban areas sit on poorly permeable soils, creating a flood risk. Noting that the plan change does not identify areas that will be used for stormwater attenuation. Questions the cost of reinforcing Council's infrastructure particularly where intensification is being	Council acknowledges that there are existing constraints and limitations within parts of the district's three waters infrastructure and that further investment will be required to support future growth and intensification. Historically Council has not maintained a dedicated in-house infrastructure department, with various planning and asset management functions delivered through shared service arrangements. This has resulted in some gaps in the long-term network planning and asset information. This does not necessarily mean that intensification anticipated by PPC3 cannot be accommodated. The ability of the networks to service development will depend on the location, scale and timing of development, together with any network upgrades or other mitigation required. Responsibility for the districts three waters network is going to change significantly as of 1 July 2027, when Central Districts Water (CDW) is expected to assume responsibility for the operation and management of these networks.

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						promoted. Notes that Council has no Development Contribution Policy and that one should be introduced.	Council is actively working with CDW to ensure that the growth and intensification anticipated through PPC3 is incorporated into its future network planning. The participating councils are also actively engaging with CDW to determine how development contributions, or other appropriate growth funding mechanisms, will operate following the transfer of water services. CDW is to assume responsibility for all RDC urban water, wastewater and stormwater pipe networks and their operation from 1 July 2027. The associated RDC assets will transfer to CDW with effect 1 July 2027. The transfer and related matters and responsibilities are underpinned by a legislative change per the Local Government (Water Services) Act 2025, which has as its purpose; 3 Purpose The purpose of this Act is to establish a framework for local government to provide water services in a flexible, cost-effective, financially sustainable, and accountable manner, by— (a) providing for territorial authorities’ responsibility for providing water services in their districts and the different methods by which they can structure service provision arrangements, including through water organisations; and (b) setting out the responsibilities that apply to territorial authorities and water organisations as water service providers, and the functions, duties, and powers that are associated with meeting those responsibilities; and (c) ensuring that information about providing water services, including information relating to revenue, charging, expenditure, and levels of service, is transparent for consumers and communities. And has the following objectives for all water service providers: 17 Objectives of water service providers (1) The objectives of a water service provider are— (a) to provide water services that— (i) are reliable; and (ii) are resilient to external factors, for example, climate change and natural hazards; and (iii) are of a quality that meets consumer expectations; and (iv) meet all regulatory requirements, including, if the water service provider is responsible for water supply services, providing drinking water that is safe for consumers; and (b) to ensure that it provides water services in a cost-effective and financially sustainable manner, including by— (i) planning effectively to manage water services infrastructure used to provide water services in the future; and (ii) sharing the benefits of efficiency gains with consumers, including when setting charges for water services; and (iii) using water resources efficiently when providing water supply services; and (c) to perform its functions as a water service provider— (i) in an open, transparent, and accountable manner; and (ii) in accordance with sound business practice; and (d) to act in the best interests of current and future consumers; and (e) to support housing growth and, if applicable, urban development in its service area; and (f) to be a good employer. Included is a requirement for “<i>planning effectively to manage water services infrastructure used to provide water services in the future</i>” as well as planning for emergencies (in another part of the Act). Given CDW will have significant additional resource available (compared to RDC waters team) and will be operating in a highly regulated environment, there is a requirement for CDW to meet the above objectives and an

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							expectation of performance to match, which should in time address the submitters concerns re: adequacy of infrastructure and planning, including for emergencies, noting that Proposed Plan Change 3 is intended to provision for residential growth for the next 30 years.
25.05	Lynne Sheridan	Infrastructure	Three Waters	Not specified	Clarity is sought on how the new water authority will manage the infrastructure capacity issues.	Clarity on how the water authority will provide capacity of infrastructure for new development.	See commentary above.
28.03	Te Runanga o Ngāti Tamakōpiri	Infrastructure	Wastewater	Oppose in part	Relief sought: a. Confirm the catchment of the Taihape WWTP b. Provide evidence of current and projected WWTP loading, including cumulative demand from all serviced areas, c. Assess whether existing and planned capacity upgrades adequately cater for total demand, d. Require infrastructure capacity assessments to include peak flows, wet weather performance, and future growth scenarios, e. Ensure that any additional connections or servicing expansions are explicitly accounted for in the plan change, f. Confirm that wastewater discharges will remain within environmental limits, including protection of the Hautapu Awa g. Enable Ngāti Tamakōpiri involvement in reviewing wastewater capacity, performance and monitoring	The plan change does not adequately manage the cumulative effects of wastewater arising from increased development in Taihape. There is limited direction to assess or manage long-term impacts on receiving environments, particularly the Hautapu Awa. Concerned about declining water quality, increase contaminant loads and adverse effects on cultural values and mauri. Seeks clarity on whether the Taihape Wastewater Treatment Plant (WWTP) receives wastewater from other settlements beyond Taihape and, if so, whether this has been taken into account. Uncertain whether the WWTP has sufficient capacity to accommodate additional demand.	The 2024-34 Infrastructure Strategy states for the project; <i>“The Taihape WWTP consent expires in 2027 and we are in the process of preparing a new consent application. This new consent will require substantial upgrades to the existing plant and discharge. The final treatment and discharge solution will only be finalised once the consent application process has been finalised and this is expected to take up to five years to complete.”</i> It is expected that the project, in addition to uplifted environmental performance and consent compliance, will have provision for future growth within Taihape.
28.04	Te Runanga	Infrastructure	Stormwater	Oppose in part	Relief sought:	The plan change does not adequately manage the cumulative effects of stormwater arising from	HRC real-time and online monitoring results for the Hautapu River show some water quality degradation downstream of Taihape in in-stream nutrient levels

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	a o Ngāti Tamakō piri				a. Require cumulative assessment of stormwater effects b. Strengthen provisions to protect water quality and receiving environments for the Hautapu Awa and Ōtaihape waterways c. Provide clear setbacks and buffers from waterways d. Require design and management of stormwater to avoid adverse effects e. Enable Ngāti Tamakōpiri involvement in environmental monitoring and assessment	increased development in Taihape. There is limited direction to assess or manage long-term impacts on receiving environments, particularly the Hautapu Awa. Without clear provisions, incremental development may result in declining water quality, increase contaminant loads and adverse effects on cultural values and mauri.	(Nitrogen and Phosphorus) compared to the upstream site (Alabasters) however e-coli (bacteria) trend is shown as <i>“likely improving”</i>. Clarity and Turbidity appears degraded through all monitoring sites (i.e. the river length), most probably as a function of the soils and topography of the catchment area. For residential infill development (within Taihape township) there may be some increase in impervious area (and runoff), however, I would not expect runoff to increase significantly for the scale of infill proposed, and hence degradation effects would be similarly commensurate (and negligible) provided the new development is dispersed through the town and not all in one location. Mitigation for potential deteriorating quality concerns could be through improved in-catchment management practices, to be implemented by Central District Water and in consultation with Horizons Regional Council.
35.03	Horizons Regional Council	Other matters	Flood Hazard	Amend	Amend the plan change provisions to explicitly require that safe access and evacuation routes are maintained during flood events to give effect to RPS HAZ-NH Policy 10(4)(b).	Acknowledges that the Natural Hazards Chapter of the District Plan addresses the flood related risks within the district but indicates that these provisions do not clearly give effect to the RPS HAZ-NH P10(4)(b) which requires that during a 0.5% AEP flood event safe evacuation can be achieved. The plan change does not include any explicit requirement to maintain safe access routes during flood events or access flood depth and velocity effects on evacuation pathways.	Per RDC Emergency Action Plan (EAP) Rev 2 DRAFT dated 13 March 2025 (Stantec) which includes dam-break flood modelling for Dams B & C on the Tutaenui Stream, and effects as modelled and mapped for the downstream waterway including Marton and Bulls: the EAP includes for internal response post defined events (e.g. significant rainfall, local landslide, evidence of dam integrity risks, seismic events); and emergency notification and potential evacuation of areas likely to be affected, based on early warning of these events, and pre-determined evacuation areas, with primary evacuation responsibility with NZ Police or local and/or regional Civil Defence Emergency Management (CDEM). Major road routes likely to be affected (per mapped model outputs): Marton: Tutaenui Rd (north of Marton), Calico Line, Broadway, Hammond, Wanganui Rd/Lower High St; Wellington Rd, Station Rd, NZ Railway (Marton-New Plymouth branch); Kensington Rd, Hendersons Line, Hawkestone Rd, Makariri Rd, Wellington Rd (lower, adjoining SH1), Bulls: SH3, Johnson St, Brandon Hall Rd, Parewanui Rd (Bulls to Scott's Ferry)
35.04	Horizons Regional Council	Other matters	Flood Hazard	Amend	Amend the Residential Intensification Area to exclude areas that overlap with the modelled inundated extent resulting from a potential failure of the Marton B Dam.	A proportion of proposed intensification overlay overlaps with the modelled inundated extent associated with a potential failure of Marton B Dam (classified as a Dangerous Dam)	It appears from an initial overlay comparison that none of the Marton growth areas external to the town are inundated per the flood overlay (RDC Emergency Action Plan 13 March 2025) being clear of the stream and flood channel, however BUL03 may be affected at its western and southern edges; and for Marton maybe access off Tutaenui Rd north of Marton, with an estimated breach to peak flow arrival time of approximately 1 hour. Intensified areas west of Broadway/Wellington Rd may be similarly impacted for access and flooding if site levels are too low. The EAP includes a plan level of response and warning to the Marton township and at-risk landowners in the event of a dam breach.

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35.07	Horizons Regional Council	Infrastructure	Stormwater	Amend	Amend the plan change provisions to require hydrological neutrality (or equivalent stormwater management outcomes) for greenfield development, and manage stormwater quality across the plan change area.	RPS HAZ-NH Policies 12 and 13 require territorial authorities to manage stormwater to avoid or mitigate adverse effects, including increased runoff and flood risk from urban development. Additionally, the NPS-FM Policy 3 requires that “Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.” Concerned that the plan change does not appropriately provide for stormwater management including that it is Council's intention to require greenfield development to be hydrologically neutral, however, this is not reflected in the plan change provisions. Further, GRZ-S4 Maximum Site Coverage does not address the site permeability or ensure that post-development runoff is managed to pre-development levels. The Marton North-West Structure Plan does not include stormwater management elements.	That the submitter's concerns be addressed through a complimentary provision (to any recommendation for approval of PPC3) to ensure new development achieves hydraulic neutrality for [XX] event [based on advice from stormwater consultant]. See NZ examples e.g. Wellington Water. Hamilton City Council.