

RANGITĪKEI DISTRICT COUNCIL

Proposed Plan Change 3

Urban Growth
Section 42A Report

Date of report:
5 October 2026

make this place home



RANGITĪKEI
DISTRICT COUNCIL

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1 Introduction

1. This report is the Officers Report for Proposed Plan Change 3 – Urban Growth (PPC3) to the Operative Rangitikei District Plan (ODP). This report is prepared under section 42A of the Resource Management Act 1991 (the “RMA” or “the Act”) to:
 - a. Assist the Hearing Panel in making their decisions on the submissions and further submissions on PPC3, and
 - b. Provide submitters with information on how their submissions/further submissions have been evaluated by the reporting officer(s) for the hearing, and their recommendations to the Hearing Panel.
2. This report responds to all submission points. The submissions have been categorised into the following ‘key issues’:
 - Key Issue 1: General Matters
 - Key Issue 2: Infrastructure
 - Key Issue 3: Transport
 - Key Issue 4: Natural Hazards
 - Key Issue 5: Rezoning and Structure Plans
 - Key Issue 6: Provisions and Performance Standards
 - Key Issue 7: Other Matters
3. The Hearing Panel may choose to accept or reject the conclusions and recommendations of this report or may come to different conclusions and make different recommendations, based on the information provided to them, including evidence provided to them by submitters.

1.1 Author and Qualifications

4. My full name is Catherine Anna Nichol, and I am a Consultant Planner at Boffa Miskell Limited.
5. I hold the qualifications of Bachelor of Resource and Environmental Planning from Massey University, Palmerston North. I am an intermediate member of the New Zealand Planning Institute.
6. I have 9 years’ experience in planning and resource management including policy development and the preparation of and processing of resource consent applications and plan changes. I have worked as a resource consents planner in local authorities across New Zealand and London, UK.
7. I began working on PPC3 in July 2025, assisting the Rangitikei District Council with reviewing the background information, reviewing the draft provisions and drafting the section 32 report.
8. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and that I have complied with it when preparing this report. Other than when I state that I am relying on the advice of another person, the evidence contained in this report is within my area of expertise. I have not

omitted to consider material facts known to me that might alter or detract from the opinions that I express.

9. I am authorised to give the evidence contained in this report on the Council's behalf to the Proposed Plan Change Hearings Commissioners (**Hearings Panel**).

1.2 Reviewer and Qualifications

10. My full name is Tiffany Jayne Gower, and I am the Strategy Manager at Rangitikei District Council.
11. I hold the qualifications of Bachelor of Resource and Environmental Planning (Hons) from Massey University, Palmerston North. I am a full member of the New Zealand Planning Institute.
12. I have 15 years of experience as a planner, having worked at four (4) territorial authorities in a range of roles including consenting, policy, and strategic planning. I have experience in processing resource consents, RMA enforcement and compliance, preparing plan changes, policies, and submissions.
13. I started work on PPC3 in 2024, which was originally intended to be part of the Council's sectional review of the Rangitikei District Plan. I completed the monitoring of the Residential and Rural Lifestyle Zones, put together background material, coordinated technical assessments, drafted the provisions, reviewed the section 32 report, and summarised and notified submissions.
14. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and that I have complied with it when reviewing this report and that I will continue to comply with it while giving oral evidence.

1.3 Supporting Evidence

15. The expert evidence, literature, or other material that I have used or relied upon for this report are:
 - The PPC3 section 32 evaluation report, and all legislation, technical, and expert reports listed in that evaluation report.
 - Infrastructure advice from Rob Smith to the requests relating to infrastructure.
 - Flooding advice from Jon Bell to the requests relating to flooding.
 - Transport advice from James Whittaker to the requests relating to transport.
 - All submissions and further submissions on PPC3.
16. Where necessary, any other expert feedback sought and considered will be clearly referenced throughout this report.

2 About the proposed plan change

2.1 Background and purpose of the proposed plan change

17. The Rangitikei District Council applied for an exemption application under section 80W of the RMA. On 28 November 2025, the Minister Responsible for RMA Reform (the Minister) approved an exemption application for PPC3 to the Operative District Plan under s80W(2)(b) and s80W(2)(h) of the Act. This plan change is proceeding in accordance with the exemption application approval.
18. PPC3 was publicly notified on 12 March 2026, with the purpose being to give effect to Pae Tawhiti Rangitikei Beyond (2023) and responds directly to Council's efficiency and effectiveness monitoring of the Residential and Rural Lifestyle Zones. PPC3 translates this strategic and monitoring evidence into statutory direction through targeted rezoning, structure planning, and updated zone and subdivision provisions to enable planned and coordinated urban growth.
19. In particular, PPC3 seeks to better enable and provide for urban growth throughout the Rangitikei District over the long-term. It does this by amending provisions that are no longer 'fit for purpose', rezoning additional land for residential purposes within Marton and Bulls, and providing opportunities for more intensive residential development within the district's main urban centres - Marton, Bulls and Taihape. This will be achieved through targeted rezoning, structure planning, and updated zone and subdivision provisions to enable planned and coordinated urban growth.
20. The scope of PPC3, in summary, is to:
 - a. Amend the General Residential Zone, Rural Lifestyle Zone and Subdivision Chapter to provide more opportunity for urban intensification, implementation of a structure plan and removing existing barriers to better enable urban growth.
 - b. Amend the Planning Maps to identify a new Residential Intensification Area Overlay for Marton, Bulls and Taihape, to enable more intensive infill development in walkable distance from town centres and local amenities.
 - c. Amend the Planning Maps to rezone areas of General Rural Zone and Rural Lifestyle Zone land to residential, on the urban fringes of Marton and Bulls.
 - d. Introduction of a new Marton North-West Structure Plan Area to guide development in a large area of land proposed to be rezoned on the periphery of Marton, including identifying and protecting locations for future road connections from inappropriate development.

2.2 Submissions

21. Submissions on PPC3 closed on 13 April 2026. The Summary of Decisions Requested was then notified on 28 May 2026, with further submissions closing on 12 June 2026. An addendum to the Summary of Decisions Requested was notified on 11 June 2025, and further submissions (on the addendum only) closed on 25 June 2026.

22. In total, 36 original submitters (with 126 individual submission points) and five (5) further submitters (with 105 individual submission points) submitted on PPC3, including one further submission in relation to the addendum.
23. Council has scheduled a Hearing of Submissions for 3-4 November 2026.
24. One submission has been withdrawn, which was referenced as Submission #03 (this submission would have been additional to the 36 other submissions received).

2.3 Out of scope submissions

25. The Hearings Panel's jurisdiction is confined to submissions that are "on" the proposed plan change, as defined by clause 6 of Schedule 1 to the RMA. It is noted that some submission points are outside the scope of PPC3, in that they raise matters beyond PPC3 provisions.
26. In some cases, submissions, or parts of submissions, appear to fall outside the scope of PPC3 but might raise other relevant issues, or their scope may be arguable.
27. The submission points that are considered not within scope of PPC3 are listed in Table 1 below and subsequently have not been evaluated in Section 4 of this Report:

Table 1: Submission points that are not within scope of Proposed Plan Change 3, or where scope is unclear

Submitter/s	Submission Point	Reasons the submission is not within scope of Proposed Plan Change 3
Reverend Robin W.K. Peirce	01.05	The submission seeks more designated space for off leash dogs. This matter is not a function of the District Plan and can be raised through the review of Council's Control of Dogs Bylaw and associated Dog Control and Owner Responsibility Policy or a Long-Term Plan or Annual Plan process.
NZTA	11.04	The submission seeks amendments to NOISE-R4. The relief sought is for provisions in the Noise Chapter relating to all zones. PPC3 is not seeking to amend the provisions within the Noise Chapter.
NZTA	11.03	The submission seeks amendments to TR-S6. The relief sought is for provisions in the Transport Chapter relating to all zones. PPC3 is not seeking to amend the provisions within the Transport Chapter.
G & C Holdings Ltd	12.01	The submission seeks to rezone the rear portion of 233A State Highway 1, Bulls from Rural to General Residential Zone. I note that this site forms part of the BUL01 growth area which was assessed through the <i>Pae Tawhiti Rangitikei Beyond</i> process. However, through the refining process, Council chose not to include this land parcel for rezoning as part of PPC3. The land is therefore outside the spatial area of the proposed rezoning in PPC3 as notified. Furthermore, the site is absent from any relevant discussion

Submitter/s	Submission Point	Reasons the submission is not within scope of Proposed Plan Change 3
		of this land in the s32 report. No rezoning of this property was proposed as part of PPC3. Refer to section 2.3.1 below for a more detailed discussion around scope.
Neil Oldfield NZTA Waka Kotahi Interested Residents of Marton and Rangitikei (IRO-MAR)	14.05 FS 01.07 FS 05.18	The submission seeks staging development to allow rural rates to be applied until dwellings/infrastructure are built. Rates are not administered by the District Plan and the function to amend rates sits outside of this District Plan process. Note: Council has a rate remission available for eligible properties that are rezoned which can be viewed on Council's website: Rates Remission Policy 2026
Baird Built	24.01 24.02 24.03 24.04 24.05 24.06	The submission seeks the removal or amendment of provisions of the General Rural Zone (GRUZ), including GRUZ-I2, GRUZ-O2, GRUZ-O3, GRUZ-P2, GRUZ-P5 and the inclusion of a new policy GRUZ-PX. The relief sought is for provisions specific to the General Rural Zone. PPC3 is not seeking to amend the provisions of the General Rural Zone. This would require a separate plan change process, including a full s32 evaluation and public notification, to ensure affected parties have an opportunity to participate.
Te Runanga o Ngāti Tamakōpiri	28.06 28.07	The submission seeks rezoning of the following sites: <i>Taihape Area School located at 26 Huia Street, from General Residential Zone to a zone that more clearly identifies it as an Education Facility</i> <i>Otaihape Health Trust (Te Whatu Ora) located at 1 Hospital Road, from General Residential Zone to Special Purpose Hospital Zone.</i> PCC3 does not propose any change to the zoning of the Taihape Area School or the Otaihape Health Trust site (which are both currently zoned General Residential Zone). The s32 report has not assessed the rezoning of sites for special purposes. Furthermore, the National Planning Standards identify the Education Zone and Hospital Zone as a discretionary Special Purpose Zone. Section 58JA of the RMA has temporarily suspended the application of discretionary directions under section 58I(4) until 31 December 2027. As a result, there is no current statutory requirement for the Council to implement this zone. The relief sought would require a separate plan change process, including a full s32 evaluation and public notification, to ensure affected parties have an opportunity to participate.

Submitter/s	Submission Point	Reasons the submission is not within scope of Proposed Plan Change 3
		Note: Taihape Area School site is currently designated under the Rangitikei District Plan for education purposes (the designation reference is MEDU-10).
Te Runanga o Ngāti Tamakōpiri	28.08 28.09	The submissions seek rezoning of the following sites: <i>Taihape Memorial Park located at 12 Kokako Street, from General Residential Zone to Open Space or Recreation Zone.</i> <i>Amend the Taihape mapping to include known slip prone or hazard-affected areas.</i> It is unclear what the submitter is referring to when they state “known slip prone or hazard-affected areas” however, it is noted that the ‘West Taihape Slip’ is an overlay in the District Plan which covers a substantial area of historic land movement on the western side of the Taihape township. There are specific provisions in the District Plan associated with this overlay. PPC3 does not propose any change to the zoning of the Taihape Memorial Park or new hazard mapping for slips. The relief sought would require a separate plan change process, including a full s32 evaluation and public notification, to ensure affected parties have an opportunity to participate.
Te Runanga o Ngāti Tamakōpiri IRO-MAR	28.10 28.11 FS 05.47	The submitter seeks (28.10 and 28.11) engagement with, and greater recognition of, Ngāti Tamakōpiri to verify spatial information to ensure protection of culturally significant sites, consideration of cultural impact assessments, and landscape features are appropriately recognised. PPC3 does not propose any changes to culturally significant sites and landscape features. The relief sought would require a separate plan change process, including a full s32 evaluation and public notification, to ensure affected parties have an opportunity to participate.
Te Runanga o Ngāti Tamakōpiri	28.12	The submitter seeks provisions for papakāinga or development on Māori owned land. The relief sought is for provisions relating to all zones. PPC3 is not seeking to amend the provisions in relation to papakāinga. Furthermore, these provisions are provided for by the National Environmental Standard for Papakāinga.
IRO-MAR	29.12	The submitter seeks to rezone existing commercial land in Taihape to allow mixed use with level access to amenities and inclusion of green spaces. PPC3 does not propose any changes to commercial zones to mixed use zoned.

Submitter/s	Submission Point	Reasons the submission is not within scope of Proposed Plan Change 3
		The relief sought would require a separate plan change process, including a full s32 evaluation and public notification, to ensure affected parties have an opportunity to participate.
Horizons Regional Council IRO-MAR	35.09 35.10 FS 05.62 FS 05.63	The submission seeks the amendment of provisions of the General Rural Zone (GRUZ), including GRUZ-S8. The relief sought is for provisions specific to the General Rural Zone. PPC3 is not seeking to amend the provisions of the General Rural Zone.
Adam Dekker	36.03	The submission seeks to include an adjoining General Rural zoned area within the proposed rezoning area associated with BUL03, citing its potential role in addressing stormwater management requirements or in any other way that this area may be able to support the development of their surrounding land. This land parcel was not included for rezoning as part of PPC3. The land is therefore outside the spatial area of the proposed rezoning in PPC3 as notified. Furthermore, the site is absent from any relevant discussion of this land in the s32 report. No rezoning of this property was proposed as part of PPC3.

2.3.1 Additional comments on scope: 233A State Highway 1, Bulls

28. G & C Holdings Ltd may be able to argue its submission is within scope of PPC3; however, further justification is required before confirming this position.
29. For the purposes of the s42A report, I consider the site as being outside the spatial area proposed to be rezoned in PPC3 as notified and note the absence of any relevant discussion of this land in the s32 report and invite the submitter to address scope matters at the hearing if they wish to.
30. If the Hearings Panel is minded to find that the requested rezoning is within scope, I have provided an assessment of the merits of the request.
31. The site adjoins the existing residential area, and I would consider this to represent a logical extension of residential development within Bulls. The transport evidence indicates that access can be achieved via the local road network, addressing concerns regarding direct access to State Highway 1, and does not identify capacity constraints that would preclude the development anticipated by the submission. Similarly, the infrastructure information before me does not identify any servicing constraints of a nature or scale that would render the requested zoning inappropriate, noting that detailed servicing matters can be addressed through future subdivision and development processes.

3 Statutory Requirements

3.1 Statutory documents

32. I note that section 3 of the s32 report provides details of the relevant statutory considerations applicable to PPC3.
33. I consider that the statutory and policy assessment in the s32 report remains largely relevant and I adopt that assessment for PPC3, except where I have provided clarity in relation to the NPS-UD and NPS-HPL in section 3.3 of this report.
34. While it is not necessary to repeat the detail of the relevant RMA sections and higher order documents here, it is important to address any statutory documents that have been subject to change since notification of the PPC3 which must be given effect to. For completeness, the relevant statutory documents for PPC3 have been reviewed below.

3.2 Resource Management Act 1991 Reform

35. On 22 September 2026, the Planning Bill and the Natural Environment Bill passed their final third reading in Parliament and they received Royal Assent on 30 September 2026, officially becoming the Planning Act 2026 and the Natural Environment Act 2026, which replace the RMA over a transitional period.
36. One month after Royal Assent, a substantive transitional period starts. During this transition period the RMA will continue to apply subject to some amendments including:
 - The introduction of new procedural principles;
 - The removal of 'out-of-scope' effects from consideration during consenting;
 - The introduction of new permitted activity pathways;
 - The introduction of new initial national standards; and
 - The establishment of the new Planning Tribunal which will exercise limited jurisdiction during this time.
37. I note that the foreshadowed new s76A of the RMA will provide for Council to remove or modify provisions in its ODP that relate to the matters listed in new s104(1A). At the time of writing this report Council is still considering its approach in relation to s76A and the potential implications this may have for the plan change. For example, certain standards amended by PPC3 may require review if they fall within the matters listed in s104(1A), such as GRZ-S6.

3.3 National Direction Documents

National Policy Statement on Urban Development 2020 (NPSUD):

38. The s32 report referred to the NPS-UD as a useful guide and framework to support Council's urban growth planning.

39. To clarify, the Council is not identified as a tier 1, 2 or 3 local authorities under the NPS-UD, as the Rangitikei District does not contain an “urban environment” as that term is defined, and PPC3 does not appear to affect any external urban environments.
40. Accordingly, the NPS-UD does not apply to Council, or to PPC3. This is relevant as it does not provide directive policy support for enabling growth.

National Policy Statement for Highly Productive Land 2022 (NPS-HPL):

41. The s32 report addressed the NPS-HPL and identified where LUC 3 land is. In response to submissions, the growth projections have been recalculated in line with up-to-date Infometrics projections and additional assessment against the NPS-HPL has been requested. This has been addressed in more detail in paragraphs 122 – 136 of this report.
42. I have provided additional background for PPC3 in the context of the NPS-HPL here.
43. The proposed growth areas within Marton and Bulls are Land Use Capability Class 3, as such clause 3.6(6) applies, and the Council is not required to pass through the test in clause 3.6(4).
44. The clause that is applicable is 3.6(5), which states:
Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.
45. The Council is required to demonstrate that the proposed growth areas are therefore rezoning the ‘minimum necessary’ to satisfy clause 3.6(5) of the NPS-HPL.
46. Through amendments to the growth projections, it was confirmed that there is a requirement for 1608 additional dwellings to be supplied by 2055. There is existing capacity for 770 additional dwelling in the district, a shortfall of 627.
47. Through reducing the growth areas proposed for rezoning and the Residential Intensification Area, as recommended later in this report, I am satisfied that PPC3 meets this clause. The growth areas provide for a potential theoretical additional 711 dwellings.

Other:

48. Since the notification of PPC3, on the 12 March 2026, there have been amendments or the introduction of the following National Direction:
 - Resource Management (Stock Exclusion) Amendment Regulations 2026
 - Resource Management (National Environmental Standards for Electricity Transmission and Electric Vehicle Charging Infrastructure Activities) Amendment Regulations 2026
 - National Environmental Standards for Commercial Forestry Amendment Regulations 2023 (as amended in 2026)
 - National Environmental Standards for Marine Aquaculture Regulations 2020 (as amended in 2026)

- Resource Management (National Environmental Standards for Papakāinga) Regulations 2026

49. I confirm that none of these are relevant to PPC3. As such, I adopt the assessment for PPC3 in section 3.2 of the s32 report as notified and have not repeated it here.

3.3.1 Horizon Regional Council's One Plan

50. PPC3 was prepared to give effect to the Horizon Regional Council's 'One Plan' which is a combined Regional Policy Statement (RPS) and Regional Plan (RP).
51. Since the PPC3 was notified, the One Plan was amended on 12 March 2026 to implement requirements from the National Policy Statement for Freshwater Management 2020 (amended December 2025) and the National Planning Standards 2019. The correction of minor errors under Clause 20A of Schedule 1 of the RMA has also been undertaken as part of this Plan Amendment process. These changes have been made to the RPS since the s32 report was prepared for PPC3.
52. The table below identifies the relevant provisions and resource management topics for Urban Growth contained in the One Plan.

Regional One Plan	Proposed PC3
Issue UFD-I1 Strategic planning and land* use Urban development that is not strategically planned can result in the piecemeal and inefficient provision of associated infrastructure. Issue UFD-I2: Adverse effects* from urban growth and rural residential subdivision* on highly productive land* Issue UFD-I3: Demand for housing, business land*, infrastructure^ and community services* Specifically: These issues can also apply to smaller towns and settlements whose functioning is influenced by the way in which growth and development occurs. Objective UFD-O1: Strategic planning and urban development - Strategic planning for urban development ensures that (1) sufficient development capacity* and land* supply for housing and business uses is provided to support growth, (2) new development, development infrastructure* and additional infrastructure* are provided in a coordinated, integrated and efficient manner, (3) the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and (4) competitive land* and development markets are supported in ways which improve housing affordability.	It is noted that many of the objectives and policies specifically relate to "urban environments" and that the Rangitikei District does not contain an urban environment. However, broadly PPC3 gives effect to these One Plan objectives and policies by enabling residential development on land identified as appropriate for that purpose and where specific impediments / constraints are proposed to be addressed through the spatial extent of zoning, structure plan details and plan provisions. It also promotes planned development and infrastructure in the North-West Marton Structure Plan area rather than reacting to the pressures for piecemeal ad hoc development.

Regional One Plan	Proposed PC3
Objective UFD-O2: Urban growth and rural residential subdivision on highly productive land* - To ensure that Territorial Authorities* consider the benefits of retaining highly productive land* for use as production land^ when providing for urban growth and rural residential subdivision*. Policy UFD-P1: Integration of infrastructure^ with land^ use (2) for all settlements, ensure there is co-ordination between the location, form and timing of urban development and the planning, funding, delivery and implementation of development infrastructure*. Policy UFD-P3: Urban growth and rural residential subdivision* on highly productive land* - In providing for urban growth and controlling rural residential subdivision* (“lifestyle blocks”), Territorial Authorities* must pay particular attention to the benefits of the retention of highly productive land* for use as production land^ in their assessment of how best to achieve sustainable management*. Policy UFD-P7: Hapū* and iwi* involvement in urban development 2. As part of making provision for iwi* and hapū* needs, aspirations, and values land* use strategies must be proactively developed and implemented to manage urban development in a manner which: refer to subclauses a., b, c., and e. Policy UFD-P8: Urban development and climate change^ 2. Territorial Authority* decisions and controls: a. on subdivision* and land* use must ensure that sustainable transport options such as public transport*, walking and cycling are integrated into land* use development, and b. on subdivision* and housing, including the layout of the site* and layout of lots in relation to other houses/subdivisions*, must encourage energy-efficient house design and access to solar energy.	
Issue ECO-I1: Indigenous biological diversity - Indigenous biological diversity is not being maintained in the Region. As a result of historical land*development practices, only a small proportion of the original extent of indigenous habitats remains. Objective ECO-O1: Indigenous biological diversity^ Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity^, including enhancement where appropriate.	PPC3 gives effect to this One Plan objective and policy by avoiding development in areas of significant indigenous vegetation and significant habitats of indigenous fauna. Technical reviews confirm that there are no significant

Regional One Plan	Proposed PC3
Policy ECO-P2: Regulation of activities affecting indigenous biological diversity[^] (3) The Regional Council must protect rare habitats*, threatened habitats* and at-risk habitats* identified in (1) and (2), and maintain and enhance other at-risk habitats* by regulating activities through its regional plan and through decisions on resource consents[^]	areas of indigenous vegetation or habitats in the proposed growth areas. Furthermore, no rare habitats, threatened habitats or at-risk habitats have been identified.
Issue HAZ-NH-I: Effects* of natural hazard* events – Natural hazard* events can adversely affect people, including their social, economic and cultural wellbeing, and the natural and physical resources* they rely on, such as property and infrastructure. In particular: <i>(1) development can exacerbate the risks from natural hazards*, particularly flooding and coastal hazards, by placing more people, property and infrastructure in hazard-prone areas and by reducing the effectiveness of existing hazard mitigation measures such as stop-banks,</i> Objective HAZ-NH-O2: Effects of natural hazard events – The adverse effects* of natural hazard* events on people, property, infrastructure* and the wellbeing of communities are avoided or mitigated. Policy HAZ-NH-P10: Development on land prone to flooding – (2) Outside of a floodway* mapped in RP-SCHED10 the Regional Council and Territorial Authorities* must not allow the establishment of any new structure* or activity, or an increase in the scale of any existing structure* or activity, within an area which would be inundated in a 0.5% AEP (1 in 200 year) flood event unless: <i>(a) flood hazard avoidance* is achieved or the 0.5% AEP (1 in 200 year) flood hazard is mitigated, or</i> <i>(b) the non-habitable structure* or activity is on production land[^], or</i> <i>(c) there is a functional necessity to locate the structure* or activity within such an area,</i> (3) Flood hazard avoidance* must be preferred to flood hazard mitigation. (4) When making decisions under RPS-HAZ-NH-P10(1) and RPS-HAZ-NH-P10(2)(a) regarding the appropriateness of proposed flood hazard mitigation measures, the Regional Council and Territorial Authorities* must: Refer to One Plan for sub-policies a to g.	PPC3 gives effect to this One Plan objective and policies by avoiding and mitigating natural hazard risks through the spatial extent of zoning and plan provisions. Technical reviews confirm that it is not appropriate to provide for residential development on the entire BUL03 growth area due to flood risk. However, it is appropriate to develop part of the area for residential purposes and use other parts of the area to provide the mitigation or offsetting of flood risk. Furthermore, a fault line traverses part of the North-West Marton Structure Plan Area. The structure plan identifies this fault line and applies a setback to avoid the development of sensitive activities in the area at risk from fault rupture.

3.4 Rangitikei Policies, Plans and Strategies

53. Section 3.4.3 of the s32 report for PPC3 summarises the status of Treaty Settlements within the Rangitikei district. Since notification of PPC3 on 12 March 2026 there have been no further Deeds of Settlement signed to settle historic Te Tiriti o Waitangi / Treaty of Waitangi Claims against the Crown, in the Rangitikei District.

3.5 Iwi Management Plans

54. There have been no changes to Iwi Management Plans since PPC3 was notified. Section 3.4.2 of the s32 Report for PPC3 explains there are no Iwi Management Plans relevant to PPC3.

3.6 Trade Competition

55. No consideration of trade competition has been given in respect of PPC3. There are no known trade competition issues raised within the submissions.

3.7 Section 32AA evaluation overview

56. This report uses 'key issues' to group, consider and provide reasons for the recommended decisions on similar matters raised in submissions. Where changes to the provisions of PPC3 are recommended, these have been evaluated in accordance with section 32AA of the RMA. These evaluations are contained at the end of each Key Issue Section of this report.
57. The s32AA further evaluation for each key issue considers:
- a) *The extent to which the amendments to the proposal are the most appropriate way to achieve the purpose of the RMA.*
 - b) *Whether the amendments are the most appropriate way to achieve the objectives of PPC3, by:*
 - (i) *Identifying other reasonably practicable options for achieving the objectives.*
 - (ii) *Assessing the efficiency and effectiveness of the provisions in achieving the objectives.*
 - (iii) *Considering the environmental, social, economic and cultural benefits and costs of the amended provisions.*
 - (iv) *Considering the risk of acting or not acting where there is uncertain or insufficient information about the provisions.*
58. The s32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated.

3.8 Procedural Matters

59. At the time of writing this report no other procedural matters have arisen or been undertaken, including pre-hearing conferences, clause 8AA resolutions of disputes, or expert witness conferencing in relation to submissions.

3.9 Clause 16 amendments

60. RDC can make an amendment to a provision under Clause 16(2) of Schedule 1, RMA, where such alteration is of minor effect or may correct any minor errors.
61. Amendments made by RDC to PPC3 are tabled below:

Provision	Clause
SUB-S5.5 – Minimum lot size	Wording has been amended to improve clarity. The notified wording could be interpreted as the 5000sqm minimum lot size applying to RLZ properties except for in Bulls and Marton which is the opposite to the intent of the standard. SUB-S5 – Minimum lot size Rural Lifestyle Zone 5. Except for Bulls and Marton <u>where the minimum lot size is:</u> a. 5000 square metres where a suitable building platform of at least 500 square metres, that is entirely free of Natural Hazard Areas 1 and 2, is identified for each lot.

4 Consideration of submissions received

4.1 Overview of submissions received

62. A total of 36 original submissions (126 submission points), noting that submission 3 was withdrawn and is not included in the total, and 5 further submissions (105 further submission points) were received on PPC3.
63. The submissions on PPC3 came from:
- | | |
|--------------|--|
| Submitter 01 | - Reverend Robin W.K. Peirce |
| Submitter 02 | - Al-lek and Michelle White |
| Submitter 03 | - SUBMISSION WITHDRAWN |
| Submitter 04 | - Ashoka Masilamani |
| Submitter 05 | - Kilian O’Gorman |
| Submitter 06 | - Noel Wright |
| Submitter 07 | - Belinda Howard |
| Submitter 08 | - Teresa Stoltz |
| Submitter 09 | - Jordan Caskey |
| Submitter 10 | - Natasha Kirk |
| Submitter 11 | - NZTA Waka Kotahi (Attn: E. Thornton) |
| Submitter 12 | - G & C Holdings Ltd (C/- Phocus Planning Ltd) |
| Submitter 13 | - Hilary Powell |
| Submitter 14 | - Neil Oldfield |
| Submitter 15 | - Fire and Emergency New Zealand (C/- Beca) |
| Submitter 16 | - Sarah Hasler |
| Submitter 17 | - David Johnson |
| Submitter 18 | - Rangitikei Development Ltd (C/- B. Simpson) |
| Submitter 19 | - Ruth and Robert Snijders |
| Submitter 20 | - Alan McCubbine |
| Submitter 21 | - Simone and Robert Pauletic |
| Submitter 22 | - Tony Jury |
| Submitter 23 | - Margett Purser |
| Submitter 24 | - Baird Built (C/- K. Baird) |
| Submitter 25 | - Lynne Sheridan |
| Submitter 26 | - Stephan and Lynn Whitford |
| Submitter 27 | - Maree Marshall |

- Submitter 28 - Te Runanga o Ngāti Tamakopiri (Attn: S. Walker)
- Submitter 29 - Interested Residents of Marton and Rangitikei (C/- F. Wallace)
- Submitter 30 - Hayden Gould
- Submitter 31 - Dean and Teresa Cunningham
- Submitter 32 - Mangapapa Trust No 2 (C/- R. & S. Smith)
- Submitter 33 - Margaret Webster
- Submitter 34 - Joanna Edmonds
- Submitter 35 - Horizons Regional Council (Attn: A. Wickramasinghe)
- Submitter 36 - Adam Dekker
- Submitter 37 - NZDF

64. Further submissions on PPC3 came from:

Further Submitter 01 - NZTA Waka Kotahi (Attn: E. Thornton)

Further Submitter 02 - Shelley Tysoe-O'Gorman

Further Submitter 03 - Rangitikei Development Ltd (C/- B. Simpson)

Further Submitter 04 - Sterling Trust - Mike O'Bryne (C/- Alex Leach)

Further Submitter 05 - Interested Residents of Marton and Rangitikei or IRO-MAR
(C/- F. Wallace)

4.2 Late submissions

65. There was one (1) late submission received, as follows:

- Submitter 36: Adam Dekker lodged a late submission which was received on the 26 May 2026 at 7.29pm and the submitter has not provided a reason for why the submission was lodged late.

66. The Chairperson of the Hearing Panel has the ability to waive or extend a time limit for Schedule 1 processes under Section 37 and 37A of the RMA, taking into account:

- (a) the interests of any person who, in its opinion, may be directly affected by the extension or waiver; and
- (b) the interests of the community in achieving adequate assessment of the effects of a proposal, policy statement, or plan; and
- (c) its duty under section 21 to avoid unreasonable delay.

67. The late submission was received prior to notification of the summary of submissions and was therefore able to be summarised and made available to submitters and the public. I am satisfied that no party has been prejudiced by the timing of the submission and I have identified no reasons to exclude it from consideration. Accordingly, I recommend that the Hearing Panel accept the late submission.

68. There were no late further submissions received on the notified Summary of Decisions Requested or addendum.

4.3 Report Structure

69. Section 4 constitutes the main body of the report and considers and provides recommendations on the decisions requested in submissions. Due to the large number of submission points received and the repetition of issues, as noted above, it is not efficient to respond to each individual submission point raised in the submissions. Instead, this part of the report groups similar submission points together under key issues. This assists in providing a concise response, to and recommended decision on, submission points.
70. Where matters are evaluated in the body of this report, the evaluation has been undertaken under the following sub-headings:
- Matters raised by submitters.
 - Assessment of the submission, including recommendations.
 - S32AA evaluation (where an amendment is recommended).
71. To provide clarity for submitters and the panel, Appendix 5 provides a tabled summary of all recommendations on submissions.
72. This approach is consistent with clause 10(2), Schedule 1 of the RMA and provides for an efficient balance between evaluating the matters raised in submissions at an appropriate level of detail while also ensuring that there is a clear recommendation made on each submission point.
73. A recommended set of provisions in response to submissions on PPC3 is provided in Appendices 1.1 to 1.3 to this report. In these appendices, the changes to the ODP provisions as notified are shown in **bold black text** (with ~~strikethrough~~ for deletions and underline for additions). The amendments recommended in this report in response to submissions are shown in **blue text** (with ~~strikethrough~~ for deletions and underline for additions). For amendments suggested by the submitter, these are shown in **red text** (with ~~strikethrough~~ for deletions and underline for additions).
74. Submissions have been categorised into themes as follows:
- Key Issue 1: General Matters
 - Key Issue 2: Infrastructure
 - Key Issue 3: Transport
 - Key Issue 4: Natural Hazards
 - Key Issue 5: Rezoning and Structure Plans
 - Key Issue 6: Rules and Performance Standards
 - Key Issue 7: Other Matters
75. I have undertaken a s32AA evaluation in respect to the recommended amendments in my assessment that represent a material change from the proposed PPC3 as notified.
76. As noted, a full list of submissions, further submissions, and officer recommendations on the submission points for PPC3 is contained in Appendix 5: Recommended Decisions on Submissions to Proposed Plan Change 3 - Urban Growth.

4.4 Additional Background Information for Infrastructure

77. Submissions have raised concerns regarding the capacity of the existing three waters and transport networks to accommodate the residential growth enabled by PPC3. These matters were considered as part of the section 32 evaluation, supported by specialist infrastructure assessments undertaken by GHD and other technical advisers¹. These assessments identified existing network constraints and considered, at a strategic level, the implications of the growth anticipated through PPC3.
78. This section provides background to assist in understanding the relationship between long-term land-use planning, infrastructure planning, and the detailed assessment of infrastructure requirements when subdivision and development occur. It also outlines the forthcoming transfer of Council's three waters responsibilities to Central Districts Water (CDW).

Long-term infrastructure planning and growth

79. PPC3 establishes a planning framework to accommodate anticipated residential growth over the long term. As discussed earlier in this report, growth is expected to occur progressively, with a relatively small number of additional dwellings anticipated each year across the district. The development capacity enabled by PPC3 should therefore not be interpreted as development that will occur immediately or simultaneously.
80. Planning for infrastructure to support growth occurs through a series of related processes. Population and dwelling projections, spatial planning and District Plan processes such as PPC3 identify the anticipated scale and location of growth. This provides an important input to infrastructure planning by identifying where additional demand on water supply, wastewater, stormwater, transport and other infrastructure is likely to arise.
81. For PPC3, the Three Waters Growth Strategy and supporting technical assessments have considered existing network constraints and the implications of anticipated growth on Council's three waters infrastructure at a strategic level. This work assists in identifying where capacity may be available, where constraints exist and where further investigation or infrastructure investment may be required as growth occurs over time.
82. A Transport Impact Assessment considered existing roading network constraints and highlighted intersections that will need to be upgraded in the future due to growth. This work was at a strategic level and assist in identifying where constraints exist, where further investigation or roading investment may be required as growth occurs over time. Council will continue managing the local roading networks in the district and any intersection upgrades can be considered through its asset management and long-term planning processes.
83. These requirements are considered further through infrastructure and asset management planning. Council's Infrastructure Strategy considers longer-term issues including growth and demand, renewals, levels of service, resilience and affordability.

¹ <https://www.rangitikei.govt.nz/council/publications/district-plan/proposed-plan-change-3-urban-growth>

Asset Management Plans provide more detailed information on the condition, performance and capacity of individual networks and identify anticipated renewals, upgrades and new works. These processes inform the Long-Term Plan and Annual Plans, through which infrastructure projects are prioritised, programmed and funded alongside other demands on Council resources.

84. This is an iterative process. The actual rate and location of development may differ from projections, information on network performance and asset condition changes over time, and investment priorities and funding availability are reviewed periodically. Infrastructure programmes are therefore updated as growth occurs and better information becomes available.
85. The PPC3 background information identifies that parts of the district's existing water supply, wastewater and stormwater networks have capacity constraints. The existence of a current constraint does not, however, necessarily mean that land is unsuitable for rezoning. The relevant consideration at the plan change stage is whether there is a reasonable basis to conclude that anticipated growth can be serviced over time, recognising that infrastructure investment or upgrades may need to precede or occur alongside development.
86. Accordingly, it is neither necessary nor practicable at the plan change stage to identify, design and fund every infrastructure project that may ultimately be required for development enabled by PPC3. The infrastructure requirements of individual developments are considered in greater detail when those developments are proposed, as outlined below.

Central Districts Water

87. The delivery and management of water services infrastructure is presently undergoing significant reform. From 1 July 2027, responsibility for the delivery of Rangitikei District Council's urban drinking water supply, firefighting water supply, wastewater and stormwater services is planned to transfer to Central Districts Water (CDW), which is a multi-council water services organisation jointly owned by Rangitikei District Council, Palmerston North City Council and Horowhenua District Council. Arrangements for the transfer of relevant assets, liabilities, statutory responsibilities and other matters are currently being progressed between CDW and the three shareholder councils.
88. The Local Government (Water Services) Act 2025 establishes the statutory framework within which CDW will provide water services. Of particular relevance to urban development and the consideration of future servicing requirements water service providers are required to provide reliable and resilient services, plan effectively for the future management of water services infrastructure, and support housing growth and urban development within their service areas. Consistent with those responsibilities, the CDW Water Services Delivery Plan identifies responding to growth, maintaining and renewing ageing infrastructure, improving resilience and achieving regulatory compliance as strategic matters that will influence future infrastructure planning and investment.
89. Of particular relevance to PPC3, the CDW Statement of Expectations agreed by the shareholder councils requires CDW to take a long-term and affordable approach to

infrastructure investment and to support growth plans and priorities of its three council areas. It also recognises that the circumstances and priorities of the individual districts differ and should be reflected in CDW's planning and delivery.

90. Rangitikei District Council notified CDW (via Chris Dyhrberg) in December 2025, to meet its obligations under Schedule 1(3)(ca), about PPC3 and invited feedback from CDW on the proposed plan change. CDW were also notified when public consultation commenced. The notification outlined the purpose of the plan change and included links to where the plan change and supporting information could be viewed.
91. It is anticipated that CDW will consider this plan change and the information developed to support it as part of its future infrastructure and investment planning, alongside updated information on network condition and capacity, the actual rate and location of development, regulatory requirements, affordability and other investment priorities.
92. Significant investment in the Rangitikei District's water services infrastructure is already planned or underway, including projects affecting the principal towns subject to PPC3². These existing and planned investments, together with the infrastructure information prepared for PPC3, provide a basis for CDW to progressively consider the infrastructure requirements associated with anticipated growth.
93. The transition to CDW therefore does not remove the need to consider infrastructure capacity as part of PPC3, nor does it establish that all infrastructure required to service the development enabled by PPC3 is currently available or funded. Rather, PPC3 provides important information on the anticipated location and scale of growth, which can inform CDW's future infrastructure planning. Detailed servicing requirements will continue to be determined as individual developments are proposed and more detailed information on development scale, timing and infrastructure demand becomes available as outlined next.

Infrastructure assessment at subdivision and development stage

94. The infrastructure assessments supporting PPC3 are strategic in nature. At the plan change stage, detailed subdivision layouts, development yields, staging, connection points and engineering solutions are generally not known. More detailed servicing assessment therefore occurs when a development proposal is sufficiently defined for its demands on the infrastructure networks to be assessed.
95. For larger developments, or where infrastructure constraints are known, developers will generally engage with Council's infrastructure staff and development engineer before lodging a resource consent application. Pre-application discussions provide an opportunity to identify network constraints and potential connection points, clarify the information and investigations required, and identify any likely servicing implications.
96. Detailed infrastructure requirements are then determined through the resource consent, engineering approval and infrastructure connection processes. These processes consider available network capacity, the additional demand generated by the development, and the proposed servicing arrangements. Depending on the scale,

² <https://www.centraldistrictswater.co.nz/Your-Water/Investing-in-water-services/Water-services-investment-for-Rangitikei>

location and characteristics of the development, this may identify the need for network extensions or upgrades, alternative servicing solutions, mitigation or staging. Conditions and engineering or connection requirements can then be used, as appropriate, to ensure the necessary infrastructure is provided before or as development proceeds.

97. RDC does not currently charge development contributions. Where development requires infrastructure works or upgrades, Council may instead enter into a Developer Agreement addressing matters such as the works required, timing, responsibilities and funding. The appropriate arrangement will depend on the development and the infrastructure requirements identified through these processes.
98. As I discussed above, the responsibility for three waters infrastructure is anticipated to transfer from Council to the Central Districts Water entity (CDW). Following establishment, CDW will be responsible for determining its own processes for providing input and advice on infrastructure requirements at subdivision. While the details of these processes are not yet fully known, this does not alter the assessment of the proposal based on the infrastructure capacity information currently available. Future infrastructure upgrades and associated funding arrangements will be addressed through the mechanisms established by the new water services entity.

Conclusion

99. Overall, PPC3 and infrastructure planning perform complementary functions. PPC3 identifies the anticipated location and scale of growth over the long term, providing an important input to infrastructure planning and investment. As responsibility for three waters services transitions to CDW, the growth and infrastructure information prepared for PPC3 is expected to inform its future planning and investment decisions. At the development level, detailed infrastructure and servicing requirements will be determined through the resource consent, engineering approval and infrastructure connection processes, including any necessary upgrades, mitigation or staging, and where appropriate, Developer Agreements. This framework enables infrastructure provision to respond progressively to the location, scale and timing of growth.

4.5 Key Issue 1: General Matters

Overview

100. The submissions grouped under 'Key Issue 1: General Matters' raise a range of matters relating to the overall approach to PPC3. For this key issue section, I have broken the matters raised by submitters into sub-issues and assessed and made recommendations for each sub-issue. The sub-issues are as follows:
- General support or opposition to PPC3.
 - Growth projections and development capacity.
 - Highly productive land.
 - Infrastructure capacity, monitoring and development contributions.
 - Spatial Planning
 - Climate change considerations.
 - Contaminated land and HAIL site considerations.

- The PPC3 consultation and notification process.

101. These sub-issues and the submissions within them are discussed and assessed in turn below.

Matters raised by submitters: General support or opposition to PPC3

102. Waka Kotahi NZTA (11.02) generally supports PPC3 and the need to accommodate urban growth in Marton, Bulls and Taihape. HRC (35.01) supports in part PPC3, noting that the plan change is broadly consistent with the Objective 1 of the Regional Policy Statement's Urban Form and Development Chapter.
103. Noel Wright (06.01, supported in part by NZTA FS 01.03 and IRO-MAR FS 05.06), Ruth and Robert Snijders (19.01 supported in part by NZTA FS 01.09 and IRO-MAR FS 05.26) and Ruth and Robert Snijders (19.03, supported by IRO-MAR FS 05.28) oppose the whole of PPC3. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.06 and FS 03.07) oppose submission 19.01 and 19.03 and considers that stormwater and infrastructure issues can be managed through future planning, engineering design, and upgrades.

Assessment of submission points: General support or opposition to PPC3

104. I acknowledge the general support for, and opposition to, PPC3. The specific matters underlying the submissions opposing PPC3, including growth assumptions, infrastructure, natural hazards, amenity and the location and extent of the proposed growth areas, are assessed further on in the relevant sections of this report.
105. As identified through those assessments, I recommend a number of amendments to PPC3 in response to submissions and the further evidence available following notification. However, I do not consider that the matters raised demonstrate that PPC3 should be withdrawn or declined in its entirety. There remains a need for an appropriate long-term planning framework for residential growth in the Rangitikei District, although I do recommend changes to the extent of some growth areas and provisions.
106. I therefore recommend that the submission points from Noel Wright (06.01, supported in part by NZTA FS 01.03 and IRO-MAR FS 05.06), Ruth and Robert Snijders (19.01 supported in part by NZTA FS 01.09 and IRO-MAR FS 05.26) and Ruth and Robert Snijders (19.03, supported by IRO-MAR FS 05.28) are rejected insofar as the submissions seek to delete PPC3 in its entirety.
107. I recommended accepting submission points from Rangitikei Development Ltd (C/- B. Simpson) (FS 03.06 and FS 03.07) insofar as their opposition to deleting PPC3 in its entirety.
108. I recommended accepting in part submissions from Waka Kotahi NZTA (11.02) and HRC 35.01 insofar as they support PPC3.

Matters raised by submitters: Growth Projections and Development Capacity

109. IRO-MAR (29.02) opposes PPC3 in part and questions the accuracy of forecast population growth to 25,000. Notes that Rangitikei District's population fell 0.3% in 2025 to 16,000 and that population growth has averaged 0.2% over the past 5 years (based on Infometrics NZ, Regional Economic Profile: population growth, 30 June

2025). Also notes that over the past 30 years the district's population has decreased by 2.6%. The submitter observes that existing planning rules permit subdivision.

110. Lynne Sheridan (25.02, supported by IRO-MAR FS 05.35) raises concerns that there are many empty building sites in Marton, and the need for rezoning more land is not clear. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.09) opposes this submission and considers that Marton does need additional residential land to meet future growth.

Assessment of submission points: Growth Projections and Development Capacity

111. A number of submitters question the growth projections used to inform the growth areas notified under PPC3 and whether the extent of land proposed for rezoning is necessary, particularly given existing vacant and underdeveloped residential land within the district. IRO-MAR (29.02) also identifies that recent population growth has been lower than that assumed when PPC3 was prepared, while Lynne Sheridan (25.02, supported by IRO-MAR FS 05.35) questions the need for additional residential zoning given existing vacant development opportunities in Marton.
112. Since notification of PPC3, I have reviewed the growth assessment using updated Infometrics population projections³. Under the high-growth scenario of an annual growth rate of 0.7%, the district's population is projected to increase to approximately 19,690 people by 2055. This represents an increase of approximately 3,690 people and an estimated requirement for approximately 1,608 additional dwellings, or an average of approximately 54 additional dwellings per year across the district. This is materially lower than the population projection of 25,000 used in preparing PPC3.
113. I therefore agree with IRO-MAR (29.02) that the growth assumptions underpinning PPC3 should be reconsidered in light of the updated projections. This does not, however, mean that no additional residential capacity is required. The relevant consideration is whether the combination of existing and additional development opportunities provides an appropriate amount and range of capacity to accommodate projected growth over the long term.
114. The updated capacity assessment identifies theoretical plan-enabled capacity for approximately 770 additional dwellings within existing residential zoned land across the towns in the district identified for residential growth (Marton, Bulls, Taihape, Hunterville, Mangaweka). A further 211 dwellings could potentially be accommodated within existing rural lifestyle zoned land. PPC3, as recommended through this report, would provide additional theoretical capacity for approximately 711 dwellings within the Marton and Bulls greenfield growth areas and approximately 316 dwellings through the Residential Intensification Area Overlay as shown in the tables below.

³ <https://population.infometrics.co.nz/rangitikei-district>

Table 2: Existing vacant land in Rangitikei District and yields

Existing	Estimated Theoretical Additional Dwelling Capacity (General Residential Zone)
Existing Vacant Land and Yields:	Total: 770
• Marton Only	• 330
• Bulls Only	• 297
• Taihape	• 88
• Other	• 55
Existing Rural Lifestyle Yields:	Total: 211
• Marton Only	• 149
• Bulls Only	• 0
• Taihape	• 42
• Other	• 20
Total Theoretical Residential Development Capacity	Total: 981

Table 3: Estimated Additional Enabled by PPC3 as Recommended

PPC3	Total Estimated Additional Residential Development Capacity Enabled by PPC3 as Recommended
Growth Areas	Total: 711
• Marton Only*	• 547
• Bulls Only	• 164
Intensification Infill Overlays	Total: 316
• Marton Only	• 186
• Bulls Only	• 103
• Taihape Only	• 27
Total Theoretical Additional Residential Development Capacity Enabled by PPC3 as Notified	Total: 1,027

**Note: The estimated yield reflects the growth areas recommended through this report and excludes the part of MAR01 and MAR07 recommended to retain its General Rural zoning. The Residential Intensification Area has also been reduced in Marton by 40 lots which has been removed from the recommended greenfield yield.*

115. The greenfield growth areas and Residential Intensification Area Overlay therefore provide approximately 1,027 additional dwelling opportunities through PPC3. When combined with the estimated capacity of 770 dwellings within existing residential zoned land, total identified residential capacity is approximately 1,797 dwellings, or approximately 189 dwellings above the projected requirement. This additional PPC3 capacity is equivalent to 12% more than the projected requirement for 1,608 additional dwellings. The existing rural lifestyle zoned land provides a further estimated capacity of 211 dwellings; however, I consider that rural lifestyle development provides a different housing choice and is not directly substitutable for urban residential capacity.
116. I acknowledge that the estimated capacity within existing residential zoned land is a substantial proportion of the projected requirement of 1,608 additional dwellings. However, plan-enabled capacity should not be equated with the number of dwellings that will necessarily be delivered over the planning period. Realisation of that capacity depends on factors including landowner willingness, development costs, market demand, servicing requirements, and site constraints. As a result, only a portion of theoretically available capacity is expected to be realised. Providing a small oversupply of capacity (12%) provides a prudent and resilient approach in ensuring sufficient land availability for long term residential growth across the District.
117. I consider that this provides for both intensification and appropriately located greenfield growth increases housing and locational choice and reduces reliance on all existing capacity being made available and realised over the planning period.
118. Conversely, the updated projections indicate that less additional greenfield capacity is required than was assumed when PPC3 was notified. I consider it appropriate to respond to that evidence by not proceeding with the proposed rezoning of the entire MAR01 and MAR07 growth areas, as assessed in Section 4.9.1. The resulting greenfield yield of approximately 547 dwellings therefore excludes MAR01 (in part) and MAR07 (in part) and, together with existing residential capacity and the Residential Intensification Area Overlay, appropriately retains a range of development opportunities to accommodate projected growth over the planning period.
119. Overall, I consider that the updated evidence supports retaining additional residential capacity through PPC3, but at a reduced scale from that notified. This approach recognises the development capacity available within the existing urban areas, while providing additional capacity and choice to account for the fact that not all plan-enabled capacity will necessarily be available or realised when required.
120. I therefore recommend that submission point IRO-MAR (29.02) be accepted in part, insofar as the updated growth projections have resulted in reconsideration of the amount of additional greenfield land required and contribute to the recommendation that a significant portion of MAR01 and MAR07 not be rezoned.
121. I recommend that Lynne Sheridan (25.02, supported by IRO-MAR FS 05.35) be accepted in part, insofar as existing vacant and underdeveloped residential capacity is relevant to determining the amount of additional capacity required, but rejected to the extent that the submission considers that existing capacity removes the need to provide additional residential development opportunities through PPC3.

Matters raised by submitters: Highly Productive Land

122. Horizons Regional Council (35.01, supported in part by IRO-MAR FS 05.54 and FS 05.55) seeks further evidence demonstrating that PPC3 appropriately responds to higher-order planning direction, including the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). Ruth and Robert Snijders (19.04) similarly raise concern regarding the loss of highly productive land associated with the proposed growth areas. Rangitikei Development Ltd (FS 03.17 and FS 03.08) considers that PPC3 has appropriately addressed the NPS-HPL through the spatial planning process, Section 32 evaluation and supporting technical assessments.
123. Similarly, HRC (35.02, supported in part by IRO-MAR FS 05.55) opposes PPC3 in part and seeks evidence and supporting technical documentation to demonstrate compliance with clause 3.6(5) of the NPS-HPL.

Assessment of submission points: Highly Productive Land

124. The NPS-HPL seeks to protect highly productive land for land-based primary production for current and future generations.
125. As outlined in the section 32 report, Rangitikei contains a high proportion of highly productive land and the urban fringe areas proposed for rezoning around Marton and Bulls are identified as LUC Class 3 land based on recent Manaaki Whenua and Horizons Regional Council information.
126. I have addressed National Direction in section 3.3 of this report. In this section, I have provided additional assessment in regard to the NPS-HPL.
127. The December 2025 amendments to the NPS-HPL are relevant to the assessment of PPC3. Clause 3.6(6) provides that clauses 3.6(1) to (4) do not apply to urban rezoning of LUC 3 land. The specific direction applying to the PPC3 urban rezoning is therefore clause 3.6(5), which requires that territorial authorities “*must take measures*” to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.”
128. The proposed growth areas were identified through the *Pae Tawhiti Rangitikei Beyond* process, which considered population and dwelling demand and an assessment of a range of potential growth locations. This was followed by the technical assessments undertaken for PPC3, which considered matters relevant to the suitability of land for urban development, including infrastructure servicing, transport and connectivity, natural hazards, ecological constraints and development feasibility. Together, these processes identified and assessed options for growth and concluded the proposed growth areas as appropriate locations to accommodate future residential growth. Given the extensive area of LUC 3 land surrounding Marton and Bulls, outward urban expansion will inevitably involve some loss of highly productive land.
129. The approach taken through PPC3 has therefore been to accommodate growth through a combination of existing residential zoned capacity, additional intensification within the existing residential area and appropriately located greenfield expansion. This is consistent with the broader considerations relevant to urban rezoning under clause 3.6, including the availability of development capacity and the need to achieve a well-functioning built environment. Although clauses 3.6(1) to (4) no longer apply to the rezoning of LUC 3 land, the matters addressed through the spatial planning

process remain relevant to determining whether the extent and location of the remaining greenfield growth areas represent an appropriate planning response.

130. As discussed in the preceding subsection on growth projections, the updated assessment identifies plan-enabled capacity within existing residential zoned land for 770 additional residential dwellings in the district, which is a shortfall of 838 dwellings remains.
131. As notified, PPC3 was proposing to enable an additional zoning for approximately 1,400 dwellings across Marton and Bulls, substantially greater than the remaining shortfall. In response to meeting the 'minimum necessary' test of 3.6(5), I have worked with RDC staff to reduce the growth areas to be in line with the projected growth areas, while balancing where growth is most appropriate.
132. This has contributed to my recommendation that MAR01 (in part) and MAR07 (in part) not be rezoned at this time. In addition, to this reduction, parts of the Residential Intensification Area have been recommended to be reduced in response to HRC's submission in section 4.9.4 of this report.
133. These recommendations reduce both the amount of additional greenfield development capacity and the spatial extent of LUC 3 land converted to an urban zone. The remaining Marton and Bulls greenfield growth areas provide an estimated capacity of approximately 711 dwellings. Including the Intensification Infill Overlay, this is an additional 189 lots over the identified growth projection demands, however, to reduce the growth areas any further would compromise the ability to achieve a well-functioning built environment while limiting dispersed urban expansion over highly productive land.
134. I consider the reduction in growth areas to provide an appropriate and proportionate response to clause 3.6(5), by limiting the spatial extent of urban zoning over LUC 3 land while retaining sufficient development capacity and housing choice to support a well-functioning built environment.
135. I therefore consider that PPC3, subject to the amendments recommended in this report, is consistent with the relevant direction of the NPS-HPL. The recommended changes strengthen the approach identified in the section 32 report by better aligning the extent of greenfield rezoning with the updated growth evidence and minimising the loss of highly productive land.
136. I recommend that Horizons Regional Council (35.01 and 35.02, supported in part by IRO-MAR FS 05.54 and FS 05.55) be accepted in part, insofar as further assessment has been undertaken and the recommended PPC3 reduces the extent of greenfield rezoning. I recommend that Ruth and Robert Snijders (19.04) be accepted in part, insofar as the loss of highly productive land is a relevant consideration but rejected to the extent that the submission seeks to preclude the remaining greenfield rezoning. Rangitikei Development Ltd (FS 03.17 and FS 03.08) is accepted in part, insofar as the remaining greenfield rezoning is considered appropriate, subject to the amendments recommended in this report.

Matters raised by submitters: Infrastructure Capacity, Monitoring and Development Contributions

137. Te Runanga o Ngāti Tamakōpiri (28.13, supported by IRO-MAR FS 05.48) considers that the Section 32 report has not sufficiently addressed Taihape issues, including infrastructure capacity, environmental effects and cultural values. The submitter considers this to undermine the confidence in the residential intensification and growth assumptions.
138. Te Runanga o Ngāti Tamakōpiri (28.14) seeks amendments to require monitoring the issues over time. The submitter considers there is no direction on how the infrastructure performance will be monitored.
139. IRO-MAR (29.15, supported in part by NZTA FS 01.19) seeks clarification on what costs may occur if the plan change is approved and seeks mandatory development contributions to support the growth.
140. Ruth and Robert Snijders (19.05, supported by NZTA FS 01.10 and IRO-MAR FS 05.29) seek an updated Development Contributions Policy. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.08) opposes this submission and considers that development contributions are a separate funding and administrative matter, not a zoning issue, and should be addressed through other Council processes.
141. Similarly, IRO-MAR (29.07, supported in part by NZTA FS 01.18) seeks that Development Contributions be mandatory. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.15) opposes this submission and considers that development contributions are a separate funding and administrative matter, not a zoning issue, and should be addressed through other Council processes.
142. Lynne Sheridan (25.04, supported by NZTA FS 01.12) seeks an amendment to require development contributions, that require infrastructure upgrades. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.10) opposes submission 25.04 and considers that development contributions are a separate funding and administrative matter, not a zoning issue, and should be addressed through other Council processes.
143. Maree Marshall (27.05, supported by IRO-MAR FS 05.43) seeks that the three waters networks upgrades should not be put onto ratepayers, and the Council or new Water CCO should consider development contributions. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.13) opposes submission 27.05 and considers that development contributions are a separate funding and administrative matter, not a zoning issue, and should be addressed through other Council processes.

Assessment of submission points: Infrastructure Capacity, Monitoring and Development Contributions

144. Several submitters raise concerns regarding existing infrastructure capacity, monitoring of infrastructure performance as growth occurs, and how the costs of infrastructure required to support growth will be funded.
145. Te Runanga o Ngāti Tamakōpiri (28.13, supported by IRO-MAR FS 05.48), considers that the section 32 evaluation has not sufficiently addressed infrastructure capacity in Taihape. I acknowledge this concern. However, PPC3 does not propose greenfield rezoning in Taihape and provides additional residential capacity only through the Residential Intensification Area Overlay, with an estimated maximum additional yield of 27 dwellings over the planning period (next 30 years). The technical assessments

supporting PPC3 consider the relevant infrastructure constraints in Taihape. I note that the GHD report considered a much higher yield in the intensification area than is now proposed under PPC3. Having regard to the limited scale of additional development enabled by PPC3, I consider the level of infrastructure assessment undertaken is proportionate and sufficient to inform the planning decisions required through PPC3. I recommend accepting in part the submission from Te Runanga o Ngāti Tamakōpiri (28.13, supported by IRO-MARF FS 05.48), insofar as the technical reports and section 32 report have provided sufficient information on Taihape.

146. Te Runanga o Ngāti Tamakōpiri (28.14) seeks provision for ongoing monitoring of infrastructure performance. I agree that infrastructure capacity and performance should be monitored as growth occurs. However, the District Plan's function is to establish the land use framework for growth and the infrastructure and servicing requirements that apply to subdivision and development, rather than monitor the operational performance of three waters networks. As outlined in Section 4.4 this monitoring is undertaken through infrastructure planning, asset management, and water service delivery processes (including consents that Council holds with the regional council). Council will continue to undertake these functions until responsibility for three waters services transfers to Central Districts Water from 1 July 2027, after which CDW will be responsible for the ongoing planning and management of those networks. Information on network capacity and performance will inform infrastructure planning and investment and the servicing and timing of future development. I therefore do not consider that a separate monitoring provision is appropriate through PPC3. I recommend accepting in part the submission from Te Runanga o Ngāti Tamakōpiri (28.14), IRO-MAR (29.15, supported in part by NZTA FS 01.19), insofar as monitoring is provided for outside of the District Plan's role and function.
147. IRO-MAR (29.15, supported in part by NZTA FS 01.19), Ruth and Robert Snijders (19.05, supported by NZTA FS 01.10 and IRO-MAR FS 05.29), IRO-MAR (29.07, supported in part by NZTA FS 01.18), Lynne Sheridan (25.04, supported by NZTA FS 01.12), and Maree Marshall (27.05, supported by IRO-MAR FS 05.43) raise concerns regarding the costs of infrastructure required to support growth and seek the use of development contributions so that those costs are not borne solely by existing ratepayers.
148. I acknowledge the underlying concern that the costs of infrastructure required to service growth should be appropriately identified and allocated. Development contributions are one mechanism available to local authorities to recover growth-related infrastructure costs. However, Rangitikei District Council does not currently charge development contributions, having resolved on 16 May 2024 not to require development contributions⁴.
149. Furthermore, development contributions are a separate infrastructure funding and cost-recovery mechanism provided for under the Local Government Act 2002 and are not imposed through District Plan provisions. As outlined in Section 4.4, where development requires infrastructure works or upgrades, the detailed requirements are determined through the resource consent, engineering approval and infrastructure connection processes. Council may also enter into developer agreements for

⁴ [RDC-Development-Contributions-Policy-2024](#)

individual subdivisions and developments addressing matters including the works required, timing, responsibilities and funding.

150. I note that SUB-P8, proposed through this plan change, provides that subdivision must “*Ensure that staging of development is efficient, consistent with, and supported by adequate infrastructure, and that development is deferred if the required upgrading of infrastructure has not occurred prior to, or will not occur in-line with, the development.*” This policy helps ensure that out of sequence subdivision will not occur unless necessary infrastructure is in place or will be provided concurrent to the development.
151. I do not consider PPC3 to be the appropriate mechanism for introducing mandatory development contributions. Decisions on the funding and recovery of growth-related infrastructure costs are appropriately addressed by Council through other means and, following the transfer of three waters responsibilities, by CDW.
152. I recommend rejecting Ruth and Robert Snijders (19.05, supported by NZTA FS 01.10 and IRO-MAR FS 05.29), IRO-MAR (29.07, supported in part by NZTA FS 01.18), Lynne Sheridan (25.04, supported by NZTA FS 01.12) and Maree Marshall (27.05, supported by IRO-MAR FS 05.43) insofar as Development Contributions are out of scope for PPC3 as the RDC has made a resolution on Development Contributions previously.
153. I recommend accepting submissions Rangitikei Development Ltd (C/- B. Simpson) (FS 03.08, FS 03.15, FS 03.13 and FS 03.10) insofar as they opposed the submissions that have been recommend being rejected.
154. I therefore do not recommend any amendments to PPC3 to introduce development contributions or additional infrastructure monitoring provisions.

Matters raised by submitters: Spatial Planning

155. Te Runanga o Ngāti Tamakōpiri (28.05) seek a Taihape Structure Plan or Spatial Plan for future growth.

Assessment of submission points: Spatial Planning

156. Te Runanga o Ngāti Tamakōpiri (28.05) seeks a Structure Plan or Spatial Plan to guide future growth in Taihape. As discussed earlier, proposed changes to Taihape under PPC3 relates to the introduction of the Residential Intensification Area Overlay, with an estimated maximum additional yield of 27 dwellings over the planning period (next 30 years). No greenfield expansion of Taihape is proposed in PPC3. In my view, the limited scale and dispersed nature of the additional development opportunity do not require the type of coordinated land use, infrastructure and movement planning that would warrant a Structure Plan.
157. Council’s monitoring also indicates that residential development in Taihape has occurred incrementally. Between 2019 and 2023, six (6) new or relocated dwellings were consented in Taihape and seven (7) residential subdivision consents were granted in Taihape over the same period. This indicates that residential development is occurring at a modest and incremental rate. Having regard to the nature and scale of development enabled through PPC3 and recent development patterns, I do not

consider a specific structure plan for Taihape is necessary for the purposes of PPC3. I recommend rejecting the submission from Te Runanga o Ngāti Tamakōpiri (28.05).

Matters raised by submitters: Climate Change considerations

158. IRO-MAR (29.04) seeks clarity on the provision for climate change under PPC3.

Assessment of submission points: Climate Change considerations

159. IRO-MAR (29.04) seeks clarification as to how climate change has been considered through PPC3, including over timeframes beyond the planning horizon used for the growth assessment. I note that the purpose of PPC3 is to provide sufficient residential development capacity to accommodate anticipated growth over the next 30 years. Climate change is relevant to PPC3 both to the location of future urban growth and to the design of subsequent subdivision and infrastructure.
160. In identifying the proposed growth areas, PPC3 has been informed by available information relating to natural hazards, infrastructure constraints, and geotechnical and seismic risks. The proposed growth areas have been refined to avoid, as far as practicable, areas subject to significant constraints and to ensure that future development can be appropriately serviced. As discussed elsewhere in this report, I have also recommended amendments concerning flood risk, stormwater management and hydrological neutrality in response to submissions and further technical evidence.
161. At the development level, climate resilience can be addressed through subdivision design and infrastructure assessment, including stormwater management, water runoff, landscaped areas, street trees, driveway materials, pedestrian and cycling connections, and the provision of active transport infrastructure. Subdivision infrastructure is also subject to applicable engineering standards, including NZS-4404:2010, which provides technical criteria for the design and construction of land development and subdivision infrastructure, including requiring consideration of climate change effects, sea level rise, and increased rainfall intensity in the design of infrastructure, including stormwater systems.
162. I therefore recommend that IRO-MAR (29.04) be accepted in part, insofar as climate change is relevant to the planning and design of future growth, but no additional amendment to PPC3 is recommended in response to this submission.

Matters raised by submitters: Contaminated Land and HAIL site considerations

163. IRO-MAR (29.09) seeks that up-to-date Hazardous Activities and Industries List (HAIL) are used for PPC3.

Assessment of submission points: Contaminated Land and HAIL site considerations

164. IRO-MAR (29.09) seeks confirmation that up-to-date Hazardous Activities and Industries List (HAIL) information has been used in preparing PPC3. In preparing PPC3 Council used available HAIL site information held by Council and Horizons Regional Council for the proposed growth areas. In addition, a Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI) provided by the landowners for a site in the MAR02 growth area.

165. In response to this submission Council's records were reassessed and it is noted that MAR07 was recorded as a 'potential landfill site' on 31 October 2025 following the receipt of a complaint that a derelict dwelling with possible asbestos materials present was dumped at this site. This matter was omitted from the assessment of this growth area as this took place prior to the site being recorded as a potential landfill in late October 2025.
166. More detailed assessment of potential contamination is appropriately undertaken when subdivision, soil disturbance or a change in land use is proposed. The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 provide a nationally consistent framework for identifying and assessing potentially contaminated land before development and, where necessary, requiring contaminated soil to be appropriately managed or remediated. In specific reference to MAR07 a PSI and likely a DSI would be required prior to any subdivision or change in land use given it is now recorded as a potential landfill site.
167. I recommend rejecting the submission from IRO-MAR (29.09) as I consider that the available HAIL information has been appropriately considered for the purposes of PPC3 and that the applicable contaminated-land framework provides for more detailed site-specific assessment when development occurs. I do not recommend any additional PPC3 provisions in response to this submission.

Matters raised by submitters: PPC3 Consultation and Notification Process

168. Ruth and Robert Snijders (19.02, with support from IRO-MAR FS 05.27) raise concerns with the notification, public drop-in sessions and the information included in the letter sent to properties within the Residential Intensification Areas. A housing density map should have been provided.
169. Lynne Sheridan (25.01, supported by IRO-MAR FS 05.34) raises concerns with the maps, as it is not clear where individual growth areas are as they are all shaded the same colour.
170. Similarly, IRO-MAR (29.01) raises concerns that the large volume of information published with the PPC3 obscures significant issues and makes it difficult to assess. Requests Council provides clearer communication early in the consultation period, not only relying on advertisements and online notices e.g. newspaper articles discussing the key proposal, together with maps and mail drops to residents and ratepayers.

Assessment of submission points: PPC3 Consultation and Notification Process

171. Several submitters have raised concerns with consultation and the notification of PPC3, the way information has been notified and the volume of information notified making it difficult to access. Suggestions on consultation have been provided including newspaper articles and mail drops.
172. I acknowledge the concerns raised. Prior to notification of PPC3, Council undertook community and landowner engagement through the preparation of *Pae Tawhiti Rangitikei Beyond*. Feedback received through that process informed the identification and refinement of the growth areas subsequently incorporated into

PPC3. This early engagement was followed by the formal plan change process under Schedule 1 of the RMA.

173. PPC3 was publicly notified in accordance with the requirements of Schedule 1 of the RMA, with the proposed provisions, planning maps, Section 32 evaluation and supporting technical assessments made publicly available for consideration and submission. Summary information was available on Council's website and social media was used to direct people to where they could find information about the plan change or who to contact with any questions. Council also provided opportunities for submitters and the wider community to obtain further information through public drop-in sessions and communication with affected landowners. Schedule 1 provides the statutory process for public notification and submissions on a proposed plan change. I have not identified any procedural matter raised by these submissions that requires an amendment to PPC3.
174. Lynne Sheridan (25.01, supported by IRO-MAR FS 05.34) specifically raises concern that the planning maps do not distinguish the individual growth areas identified through the earlier *Pae Tawhiti Rangitikei Beyond* process. I acknowledge that separately identifying those areas may have assisted readers in relating PPC3 back to the Community Spatial Plan. However, the purpose of the notified planning maps is to identify the proposed District Plan zoning. As the relevant growth areas are proposed to have the same General Residential zoning, displaying that zoning consistently with the existing District Plan and ePlan mapping approach is appropriate. I therefore do not recommend any amendment to the planning maps for this purpose.
175. I also acknowledge the concern that the volume and technical nature of the supporting information may have made PPC3 difficult for some readers to navigate. However, the technical assessments address the range of infrastructure, environmental, natural hazard and other planning considerations relevant to determining the appropriateness of the proposed growth areas and provisions. In my view, the need for an adequate evidential basis for PPC3 justifies the supporting technical information provided. The volume or presentation of that information does not provide a planning basis for amending or withdrawing PPC3.
176. The suggestions made by submitters regarding clearer communication methods, including newspaper articles, mail-outs and simplified mapping, may nevertheless be useful considerations for future plan-making and community engagement processes. They do not, however, require amendments to the provisions or planning maps proposed through PPC3.
177. I therefore recommend that Ruth and Robert Snijders (19.02, supported by IRO-MAR FS 05.27), and IRO-MAR (29.01) be rejected, insofar as amendments to or withdrawal of PPC3 are sought on the basis of the consultation, notification, mapping or presentation of supporting information.

4.6 Key Issue 2: Infrastructure

Matters raised by submitters - Key Issue 2: Infrastructure

178. Al-lek and Michelle White (02.01, supported by IRO-MAR FS 05.03, supported in part by NZTA FS 01.01) are opposing the rezoning of residential land due to issues with water, wastewater and stormwater infrastructure capacity. The submitters also raise concerns with lack of schools and healthcare. Rangitikei Development Ltd FS (03.02) opposes this submission.
179. IRO-MAR (29.05) seek that upgrades are in place prior to PPC3 to enable further subdivision. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.14) oppose this submission as it will delaying or preventing rezoning.
180. Maree Marshall (27.04, supported by IRO-MAR FS 05.42) opposes the findings of the recommendations of the RDC 3 Waters Growth Strategy Growth Assessment (Appendix 12 of the Section 32 Report). The submitter considers that more specific reports are required once development is proposed. The submitter also raised concerns with attenuation ponds and impact on flooding. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.12) opposes submission point 27.04 as this would delay or prevent future growth.
181. Lynne Sheridan (25.05) seeks clarity on how the water authority will provide capacity of infrastructure for new development.
182. Te Runanga o Ngāti Tamakōpiri (28.02, 28.03 and 28.04) oppose in part PPC3 in relation to Taihape, which allows intensification without addressing the infrastructure capacity, most notably wastewater. The submitter has concerns that there is no framework to consider staging, sequencing or infrastructure readiness. Furthermore, clarity around the use of the Taihape Wastewater Treatment Plant (WWTP) is sought. Concern is raised in relation cumulative stormwater rates. NZTA (FS 01.16) support this in part, and IRO-MAR (FS 05.45 and FS 05.46) support this submission.

Assessment of submission points - Key Issue 2: Infrastructure

Infrastructure capacity and servicing of growth

183. Several submitters have raised concerns with the existing water supply, wastewater and stormwater (Three Waters) capacity in Marton, Bulls and Taihape, and whether infrastructure upgrades should occur before additional residential growth is enabled. The submitters are concerned that the Three Waters networks already experience capacity constraints and that infrastructure, including schools and healthcare services, may not be able to accommodate significant population growth without corresponding investment.
184. I acknowledge the submitters' concerns regarding the capacity of the Three Waters networks. The technical assessments supporting PPC3 identified existing constraints within parts of the Three Waters networks and consider, at a strategic level, the

implications of the proposed growth. These constraints have assisted the Council with identifying and refining the most appropriate areas for future residential growth. Rob Smith, Council's Development Manager, has also provided further advice in response to submissions, included as Appendix 6.

185. I note that the technical assessments provided by GHD were strategic and provided high level assessments for the development potential of the more suitable growth areas assessed under the *Pae Tawhiti Rangitikei Beyond* process. The notification of PPC3 did not include all of these growth areas, and due to the recommendations in this report the growth areas now provide a greenfield capacity for 711 new dwellings. As such, GHD is considering how/if the proposed reduced level and change in spatial distribution of growth may impact infrastructure differently to what was outlined in the Three Waters Growth Strategy. This is to confirm the conclusions of this section and will be uploaded to the website when it is available. As outlined in Section 4.4, PPC3 establishes a long-term land use framework for accommodating projected growth for the district, while infrastructure planning and investment respond progressively to the location, scale and timing of growth. The existence of a current network constraint does not, of itself, make rezoning inappropriate where there is a reasonable basis to conclude that the constraint can be addressed before or as development occurs. Conversely, rezoning does not establish that sufficient infrastructure capacity is immediately available for every development enabled by PPC3.
186. I do not therefore agree with IRO-MAR (29.05) that all infrastructure upgrades need to be completed before land is rezoned through PPC3. Growth is projected to occur progressively over the planning period, and infrastructure requirements will similarly be planned and delivered over time. Importantly, the subdivision provisions require all subdivision to obtain resource consent, enabling Council to undertake a detailed assessment of infrastructure servicing and network capacity at the design stage. Through that process, any site-specific capacity constraints can be identified and addressed through infrastructure upgrades, development staging, or other consent requirements as necessary. I recommend rejecting submission IRO-MAR (29.05) and accepting Rangitikei Development Ltd (FS 03.14).
187. I agree with Maree Marshall (27.04, supported by IRO-MAR FS 05.42) that more detailed infrastructure assessment will be necessary when individual developments are proposed and recommend accepting this submission in part. I recommend accepting in part Rangitikei Development Ltd (FS 03.12), insofar as it opposes delaying or preventing the proposed rezoning. I do not consider this demonstrates that the strategic assessments supporting PPC3 are inadequate for the purpose for which they were prepared. At the plan change stage, subdivision layouts, development yields, staging and connection points are generally not known. The Three Waters Growth Strategy identifies existing network constraints and potential implications of growth, while detailed servicing requirements are subsequently determined through the resource consent, engineering approval and infrastructure connection processes.
188. As outlined in the advice from Mr Smith, development-specific assessment may include water pressure and flow testing of Council's water mains, wastewater network and catchment assessment, and detailed stormwater assessment. Depending on the

development and available network capacity, this may identify a need for network extensions or upgrades, alternative servicing solutions, mitigation or staging.

189. Stormwater management is also relevant to the servicing of future growth. As assessed under Key Issue 4, urbanisation can increase impervious surfaces and alter runoff rates, volumes and flow paths. I have therefore recommended amendments to the subdivision provisions to more clearly require hydraulic neutrality, or an equivalent stormwater management outcome be demonstrated through site-specific assessment and modelling, together with provisions addressing overland flow paths and flood and stormwater management infrastructure.
190. These recommended amendments provide clearer direction than relying solely on existing engineering practice and will better ensure that the stormwater effects of individual developments be addressed when subdivision occurs. Detailed design matters, including the form, location, ownership and maintenance of any detention or other stormwater infrastructure, can then be determined through the subdivision and engineering approval processes having regard to the particular development and catchment.
191. I recommend submissions from Al-lek and Michelle White (02.01, supported by IRO-MAR FS 05.03 and supported in part by NZTA FS 01.01) be accepted in part, insofar as existing infrastructure capacity and the servicing requirements of future growth are relevant considerations, but rejected to the extent that the submission seeks to prevent the residential rezoning proposed through PPC3. Rangitikei Development Ltd (FS 03.02) be accepted in part, insofar as it supports the residential rezoning subject to infrastructure requirements being addressed as growth occurs.
192. Submitters also raise concerns regarding the use of detention ponds and the operation of the existing Wanganui Road detention pond. I acknowledge that detention infrastructure may form part of the stormwater response required for future development. However, the need for, location, design, ownership and ongoing maintenance of any new detention infrastructure will depend on the characteristics of the development and catchment and is appropriately determined through detailed stormwater assessment at subdivision stage. As discussed under Key Issue 4, I have recommended amendments requiring urban subdivision to achieve hydraulic neutrality, or an equivalent stormwater management outcome, while providing sufficient land for any stormwater infrastructure required. In relation to the Wanganui Road detention pond, this is owned and managed by Horizons Regional Council and is therefore distinct from any new detention infrastructure required to service development enabled by PPC3.
193. Lynne Sheridan (25.05) seeks clarity on how the new CDW authority will provide capacity of infrastructure for future development. I have addressed this in Section 4.4 of this report. Council has provided CDW with the growth and infrastructure information prepared for PPC3, and it is anticipated that this information will be considered through CDW's future infrastructure and investment planning. The Statement of Expectations requires CDW to support the growth plans and priorities of its shareholder council areas and to align its water services with strategic land-use planning.

194. This does not mean that all infrastructure required for development enabled by PPC3 is presently available, funded or will necessarily be provided by CDW. Detailed servicing requirements will continue to be identified when development is proposed, including any necessary network upgrades, mitigation, staging or developer-specific works. I therefore consider that the infrastructure planning and development-level processes outlined in Section 4.4 appropriately address the matters raised by the submission.
195. I recommend accepting in part the submission from Lynne Sheridan (25.05) insofar as further information has been provided regarding future infrastructure planning and the role of CDW, but no further amendment to PPC3 is recommended in response to this submission.

Taihape infrastructure

196. Te Runanga o Ngāti Tamakōpiri (28.02, 28.03 and 28.04) raises concerns regarding infrastructure capacity in Taihape, particularly wastewater, and seeks greater certainty regarding infrastructure readiness, staging and sequencing. The submissions also raise concerns regarding cumulative stormwater effects.
197. As discussed earlier, the extent of proposed changes specific to Taihape under PPC3 relate to the introduction of the Residential Intensification Area Overlay, with an estimated maximum additional yield of 27 dwellings over the planning period (next 30 years). No greenfield expansion of Taihape is proposed in PPC3. In my view, the limited scale and dispersed nature of the additional development opportunity do not require the additional assessment of infrastructure readiness, or consideration of staging and sequencing requested by the submitter.
198. The Council's 2024-34 Infrastructure Strategy acknowledges that the Taihape Wastewater Treatment Plant (WWTP) consent expires in 2027 and that a new consent application is currently being prepared. The Infrastructure Strategy notes that substantial upgrades to the existing treatment plant and discharge regime are anticipated as part of that process. It is expected that the resulting infrastructure investment will not only improve environmental performance and consent compliance but also provide for future growth within Taihape. Council has engaged experts to undertake a structured technical assessment of the Taihape WWTP to support future upgrade planning, environmental discharge compliance and operational optimisation.
199. The work is being undertaken in staged components covering data review, site assessment, hydraulic and catchment analysis, process assessment, upgrade options and compliance, reporting, and HAZOP/finalisation. This work will help inform the resource consent which is required for the treatment plant.
200. At the time of writing this report, the details of the WWTP upgrades are still being worked through. However, I am satisfied that the network capacity can be managed through detailed design, for the limited scale of infill being provided within Taihape.
201. With respect to stormwater, the recommended amendments assessed under Key Issue 4 will require residential and rural lifestyle subdivision and development to achieve hydraulic neutrality, such that post-development runoff does not exceed pre-development runoff. Given the limited scale of growth enabled in Taihape by PPC3 and the dispersed nature of the proposed infill development, any increase in

impervious surfaces and associated runoff is expected to be minor and capable of being appropriately managed through detailed design and stormwater management measures at subdivision consent stage.

202. It is also relevant that responsibility for urban water, wastewater and stormwater infrastructure is being transferred to CDW from 1 July 2027. Under the Local Government (Water Services) Act 2025, CDW will be responsible for long term infrastructure planning, capacity management and investment to support future growth. Information prepared through PPC3, including growth projections and infrastructure assessments, can help inform this future planning.
203. Accordingly, I am satisfied that PPC3 appropriately provides for the anticipated level of growth in Taihape and that infrastructure servicing, capacity constraints and any necessary upgrades can be appropriately managed through infrastructure planning processes and the subsequent subdivision and development consent stages.
204. I recommend accepting in part the submissions from Te Runanga o Ngāti Tamakōpiri (28.02, 28.03 and 28.04, supported in part by NZTA FS 01.16 and by IRO-MAR FS 05.45 and FS 05.46) insofar as infrastructure capacity, wastewater servicing and cumulative stormwater effects are relevant to the additional development enabled in Taihape, but rejected to the extent that a separate staging or sequencing framework for Taihape is sought. The recommended stormwater amendments under Key Issue 4 provide additional direction for managing stormwater effects at subdivision stage. I recommend no amendments to PPC3 in response to these submissions.

4.7 Key Issue 3: Natural Hazards

Overview

205. This section of the report covers submissions relating to natural hazards, including retention dams, flood hazard overlays and amendments to provisions. Jon Bell, Fox Environmental Ltd (formerly e2Environmental Ltd), provided a BUL03 Growth Area Flood Risk Assessment. Mr Bell has also provided evidence in response to the submissions for this key issue, and this is attached as Appendix 7.1 – 7.6 to assist submitters and hearing panel.

Matters raised in submissions - Key Issue 3: Natural Hazards

206. Neil Oldfield (14.02) raises concern regarding the operation of the Horizons Regional Council (HRC) retention dam and spillway behind Wanganui Road, including the frequency with which the dam fills and the spillway operates. The submitter questions who will pay for future upgrades of this. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.05) opposed this submission arguing that stormwater and infrastructure issues can be managed through future planning, engineering design, and upgrades.
207. HRC (35.03, supported in part by IRO-MAR FS 05.56) seeks an amendment to explicitly require that safe access and evacuation routes are maintained during flood events to give effect to the RPS HAZ-NH Policy 10(4)(b).

208. HRC (35.05, supported in part by IRO-MAR FS 05.58) seeks to amend the provisions to ensure that future development does not impact existing flood management infrastructure (i.e. dams and associated systems) and does not increase runoff that compromises flood [sic] protection, and maintains safe and practical access for operation and maintenance of flood management assets. Rangitikei Development Ltd (C/- B. Simpson) (FS 03.18) opposes submission 35.05 and oppose delaying or preventing rezoning.
209. HRC (35.06, supported in part by IRO-MAR FS 05.59) seek clarification on the flood modelling approach used in the Three Waters Growth Strategy. The submitter questions the model used by GHD in the 3 Waters Growth Strategy in relation to stormwater and flood hazard. Indicates that this assessment does not provide sufficient information to demonstrate alignment with the National Policy Statement for Natural Hazards (NPS-NH) and the One Plan in relation to managing existing flood hazard and risk.
210. HRC (35.07, supported in part by IRO-MAR FS 05.60) seek an amendment to 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.

Assessment of submission points - Key Issue 3: Natural Hazards

211. The submissions raise a number of interrelated matters concerning flood risk, stormwater management and the operation of existing flood management infrastructure. In considering these submissions, I have had regard to the higher-order direction identified in Section 4 of this report, the technical information supporting PPC3, the further engineering advice provided following notification, and discussions with HRC.
212. A key distinction in my assessment is between whether land is appropriate to be zoned for future residential development and the detailed design requirements that must be satisfied before that development occurs. Rezoning land does not remove the requirement to manage natural hazard risk. Rather, future subdivision and development remain subject to the District Plan's applicable natural hazard and subdivision provisions and, where relevant, site-specific hydraulic and engineering investigations. The technical advice is that the modelling undertaken for the Three Waters Growth Strategy was a rapid hazard assessment intended to identify principal constraints to growth areas and was not intended to replace the site-specific modelling required when individual developments proceed.
213. The assessment of the submission points raised for Key Issue 3 have been broken into the following sub-issues:
 - Retention dams and flood management infrastructure
 - Safe access and evacuation during flood events
 - Flood modelling and the Three Waters Growth Strategy
 - Hydrological neutrality and stormwater quality
 - Site-specific flood hazard mapping and mitigation

214. Each sub-issue is assessed in turn below, with recommendations provided for each sub-issue.

Retention dams and flood management infrastructure

215. Neil Oldfield (14.02) raises concerns regarding the existing HRC retention dam, including the frequency with which the dam fills and the spillway operates, and questions responsibility for future upgrades. Rangitikei Development Ltd (FS 03.05) considers that stormwater and infrastructure issues are capable of being addressed through subsequent planning, engineering design and upgrades.
216. I acknowledge the concerns regarding the performance and future management of existing flood management infrastructure. The evidence before me does not, however, demonstrate that the existence or operation of the retention dam means the proposed rezoning is inappropriate in itself. The more relevant planning question is whether PPC3 establishes an appropriate framework to ensure that development does not compromise the function of these existing assets or increase flood risk.
217. This matter is also directly addressed by HRC (35.05, supported in part by IRO-MAR FS 05.58), which seeks to ensure that development does not affect existing flood management infrastructure, increase runoff in a manner that compromises flood protection, or prevent practical access for operation and maintenance. During informal discussions with HRC staff in preparing this report, particular attention was given to maintaining stormwater management areas and overland flow paths and ensuring access to flood management assets is retained. A 5-metre access corridor to relevant dam infrastructure was discussed. The discussion also confirmed that changes in ground levels associated with future development need to be designed so that floodwater is not displaced onto other land.
218. I agree with the intent of submission 35.05. In my view, these matters are most appropriately addressed through a combination of the Marton North-West Structure Plan and as part of any future subdivision, where existing stormwater management infrastructure, overland flow paths and access requirements can be identified and protected. This provides a more direct link between the identified constraint and future development than relying solely on a generic district-wide provision.
219. The existing HRC retention dam is shown in Figure 1 below. HRC has requested that a 5-metre access corridor is provided. However, I do not consider this necessary given the fixed and indicative features on the Structure Plan, which would prevent development from occurring in a way that would preclude future access. The features (i.e. vehicle access and the active fault line) effectively provide a connection from Wanganui Road to the dam and this is considered adequate to providing the access and maintenance of this dam. Furthermore, any future access

can be assured through subdivision. In addition, it is noted that the Council would send any subdivision consent application of this nature to HRC for comment.



Figure 1: HRC Retention Dam (grey)

220. Accordingly, I recommend that the Marton North-West Structure Plan be amended as shown in Appendix 2 to identify the relevant stormwater/flood management areas, dam break scenarios and the ponding extent of the dam located within 56 Wanganui Road. This approach accepts the substance of submission 35.05 without preventing the underlying residential zoning of land that can otherwise be appropriately developed.
221. The question of who ultimately funds or undertakes upgrades to existing regional flood infrastructure is an infrastructure ownership and funding matter and cannot appropriately be determined through PPC3. I therefore recommend that Neil Oldfield's submission (14.02) be accepted in part insofar as it identifies a legitimate issue that future development must respond to but rejected to the extent that it seeks PPC3 to determine responsibility for future infrastructure expenditure. Rangitikei Development Ltd (FS 03.05) is accepted in part insofar as these matters can be addressed through subsequent subdivision and engineering design.
222. I recommend accepting in part the submission from HRC (35.05), supported in part by IRO-MAR (FS 05.58), with amendments to the subdivision provisions to ensure existing flood and stormwater management infrastructure and overland flow paths are identified, and their functions and necessary operational and maintenance access are maintained through subdivision design. Rangitikei Development Ltd (FS 03.18) is

accepted in part insofar as these matters can be addressed without preventing the rezoning proposed by PPC3.

Safe access and evacuation during flood events

223. HRC (35.03, supported in part by IRO-MAR FS 05.56) seeks an amendment to explicitly provide for safe access and evacuation during flood events.
224. The Natural Hazards Chapter of the ODP provides a framework for managing flood risk to people and property, including residual risk. However, it does not expressly address safe evacuation where new urban subdivision increases the number of people exposed to an identified flood hazard.
225. Emergency management arrangements provide for warning and response to river flooding and dam-related flood events, including potential evacuation where required. However, reliance on emergency response does not remove the need to appropriately manage evacuation risk through land-use planning. Where new urban development is enabled, the subdivision and access pattern should avoid unnecessarily creating or exacerbating evacuation risk. This is particularly relevant given the engineering advice identifies that a number of routes may be affected under the modelled dam-break scenarios.
226. I therefore agree that the outcome sought should be more explicit for urban subdivision enabled by PPC3. However, I do not consider it appropriate to require an evacuation route to remain accessible throughout a flood event. As discussed with HRC, the appropriate response will depend on the nature and severity of the hazard and may include evacuation before inundation or provision for safe refuge where continued access cannot practicably be maintained.
227. I consider this matter could be appropriately addressed through a new urban subdivision policy in the Subdivision Chapter. This provides direction for the design of residential and rural lifestyle subdivision without amending the operative Natural Hazards Chapter or flood hazard mapping, with the appropriate response determined through site-specific assessment at subdivision stage.
228. I therefore recommend that HRC (35.03), supported in part by IRO-MAR FS 05.56, be accepted in part, and that the following new urban subdivision policy be included:
- SUB-PX Ensure residential and rural lifestyle subdivision on sites affected by flood hazard provide safe and practicable means for the evacuation of people during flood events, or where evacuation cannot practicably be provided, appropriate means of safe refuge, having regard to the nature and severity of the flood hazard.*

Flood modelling and the Three Waters Growth Strategy

229. HRC (35.06, supported in part by IRO-MAR FS 05.59) seeks clarification regarding the flood modelling undertaken for the Three Waters Growth Strategy and questions whether that assessment adequately demonstrates that flood risk can be managed.
230. I acknowledge this concern. As clarified through discussions with HRC, the GHD work was undertaken as a rapid hazard assessment to assist in identifying the principal constraints affecting potential growth areas. It was not intended to constitute detailed

flood modelling for individual development proposals. Future development remains subject to site-specific assessment and modelling at subdivision and development stage.

231. In my view, this distinction is important. PPC3 is establishing a long-term zoning framework rather than approving a particular subdivision design. The modelling therefore needs to be sufficient to identify whether there is a significant constraint that would make rezoning inappropriate and to identify matters that require more detailed consideration before development occurs. It does not need to resolve the detailed design of stormwater infrastructure for each future development.
232. The further evidence of Mr Bell (Appendices 7.1 – 7.5) outlines the adequacy and limitations of the flood information for this purpose. I consider the concern raised by HRC has been appropriately clarified. I recommend that submissions from HRC (35.06, supported in part by IRO-MAR FS 05.59) be accepted in part, insofar as additional information and expert evidence has been provided in response to the submission, but no further change to the zoning is required solely in response to this matter.

Hydraulic neutrality and stormwater quality

233. HRC (35.07, supported in part by IRO-MAR FS 05.60) seeks amendments requiring hydrological neutrality, or an equivalent stormwater management outcome, for greenfield development and management of stormwater quality across the PPC3 area. The submission considers that the intention to achieve hydrological neutrality is not adequately reflected in the notified PPC3 provisions or Marton North-West Structure Plan.
234. I note that the terminology changes between hydrological and hydraulic. The GHD report (Appendix 12 of the s32 Report) refers to hydraulic neutrality while HRC refers to hydrological neutrality. The terms are related but not interchangeable. Hydrological neutrality is the broader concept, concerned with preserving the overall water balance and runoff response of a site, while hydraulic neutrality usually has a narrower focus on controlling the rate, and sometimes the volume, of stormwater discharged from a development. In terms of the District Plan, I have reviewed other district plans⁵ that have used the term, and am satisfied that the appropriate term for a district plan is hydraulic neutrality. I note that this term 'hydraulic neutrality' is usually defined in a District Plan to ensure plan users have clarity on what the provisions are seeking to achieve. There is no scope under PPC3 to amend the definitions chapter. As such, any use of the term has been defined within the provision as required.
235. I agree with the HRC submission in relation to the need to appropriately manage stormwater generated by residential development. The engineering evidence of Mr Smith confirms that new development is generally expected to achieve hydrological neutrality (hydraulic neutrality as discussed above) so that post-development runoff does not increase relative to pre-development conditions. The evidence also identifies that Council does not currently have a consistent catchment-wide methodology for

⁵ Wellington City Council District Plan, Porirua District Plan and the Kapiti District Plan

calculating this outcome or for the long-term ownership and management of detention infrastructure.

236. The existing Standard SUB-S2 requires subdivision to provide for the collection and disposal of surface water and requires that this does not create or exacerbate ponding or inundation. While this provides an appropriate starting point, it does not expressly require hydraulic neutrality. In my view, reliance on existing practice at resource consent stage provides insufficient certainty for the urban development enabled by PPC3. Increased impervious surfaces have the potential to alter stormwater runoff and contribute to flood risk beyond the development site. This is particularly relevant given the existing flood-management infrastructure and overland flow paths within and adjoining the Marton North-West Structure Plan Area.
237. I therefore consider that the subdivision provisions should establish a clearer stormwater management outcome for residential and rural lifestyle subdivision. I recommend a new policy requiring integrated stormwater management and an amendment to SUB-S2 requiring hydraulic neutrality, or an equivalent outcome demonstrated through site-specific stormwater assessment and modelling, such that post-development runoff does not increase flood risk on other land. Given the absence of a consistent catchment-wide methodology, I do not consider it appropriate for PPC3 to prescribe particular design events or calculation methodologies. These technical matters can be addressed through the relevant engineering standards and site-specific assessment.
238. Stormwater quality is also relevant to the design of urban development. However, PPC3 should not duplicate regional controls applying to stormwater discharges to land or water. In my view, the appropriate District Plan response is to ensure that subdivision provides sufficient space for the stormwater infrastructure necessary to service the development. This enables stormwater quantity and quality requirements to be addressed through an integrated design while recognising the respective functions of territorial authorities and regional councils.
239. I consider this approach more appropriate than identifying stormwater management areas spatially on the Structure Plan or introducing a separate stormwater standard. It builds on the existing subdivision framework while establishing a clear outcome for the urban development enabled by PPC3 and retaining flexibility for the detailed engineering response to be determined at subdivision stage.
240. Mr Smith has also noted when reviewing SUB-S2, that the wording for Clause c can be interpreted the wrong way, suggesting ponding could be created on purpose to achieve hydraulic neutrality (e.g. streets can be designed as a detention area during heavy rainfall events for some developments). Through discussions with RDC staff, I consider an amendment is required to Subclause c to clarify that each private lot must have appropriate SW management in place.
241. I therefore recommend that HRC (35.07), supported in part by IRO-MAR FS 05.60, be accepted in part, and that the subdivision provisions be amended to provide for integrated stormwater management and hydraulic neutrality as set out in Appendix 1.1 and below.

New policy:

SUB-PX

Residential and lifestyle subdivision and development is required to provide for integrated stormwater management that:

- a. achieves hydraulic neutrality, or an equivalent stormwater management outcome, so that development does not increase flood risk on other land;
- b. maintains the function of existing overland flow paths and flood and stormwater management infrastructure; and
- c. provides sufficient land for stormwater management infrastructure necessary to service the subdivision.

Advice Note: Hydraulic neutrality means managing stormwater runoff through either on-site disposal or storage, so that peak stormwater flows and volumes are released from the site at a rate that does not exceed the modelled peak flows and volumes from the site prior to any proposed subdivision, use or development.

Amendment to SUB-S2, by retaining SUB-S2.1(a) to (c) and adding a new clause 2 as outlined below:

SUB-S2 Essential services

All Zones

1. The development must provide the following connections for each allotment:
 - a. A potable water supply, including connection to a reticulated supply of potable water where this is available within 50 metres of the allotment.
 - b. A system for the collection, treatment and disposal of all sewage wastes, including connection to a public sanitary drainage system where this is available within 50 metres of the allotment.
 - c. A system for the collection and disposal of surface water from ~~all activities, buildings, allotments, roads, the allotment, buildings contained within it, and accessways, private ways, private roads, and upstream catchments.~~ Such provision must not create any ponding or inundation, or exacerbate any existing ponding or inundation effects.
2. Within the General Residential and Rural Lifestyle Zones any subdivision must:
 - a. achieve hydraulic neutrality, or an equivalent stormwater management outcome, such that post-development stormwater runoff does not increase flood risk on other land; and
 - b. provide sufficient land for any stormwater management infrastructure required to service the subdivision.

Advice Note: Hydraulic neutrality means managing stormwater runoff through either on-site disposal or storage, so that peak stormwater flows and volumes are released from the site at a rate that does not exceed the modelled peak flows and volumes from the site prior to any proposed subdivision, use or development.

Site-specific flood hazard mapping and mitigation

242. Margett Purser (23.01, supported by IRO-MAR FS 05.33) opposes the flood hazard applying to 22A Wanganui Road and refers to the hazard being noted on the 'title' of this property. Adam Dekker (36.02) similarly questions the application of flood hazard constraints, referring to observations from the June 2023 flooding of the Tutaenui Stream and considering that any flood risk can be mitigated through civil works and landscaping.
243. PPC3 does not propose amendments to the Natural Hazards Chapter or the flood hazard mapping associated with those provisions. While natural hazard risk is relevant to the suitability of land for the zoning and development enabled by PPC3, I consider that relief seeking to amend or remove the operative flood hazard mapping is beyond the scope of this plan change. PPC3 must therefore proceed on the basis of the operative identification of the flood hazard, while considering whether that hazard can be appropriately managed through the provisions applying to future subdivision and development.
244. I acknowledge the submitter's site-specific observations. However, the absence of flooding during an individual historic event does not provide a sufficient technical basis to conclude that land is unaffected by the operative flood hazard. Nor does it provide a basis for disregarding that hazard when assessing future subdivision and development.
245. Conversely, the presence of an identified flood hazard does not necessarily preclude development. The relevant PPC3 provisions provide for natural hazard risk to be considered and, where appropriate, avoided or mitigated through subdivision and development. Detailed matters such as earthworks, finished ground and floor levels, overland flow paths and stormwater management can therefore be addressed through site-specific technical assessment at the time development is proposed.
246. I therefore recommend that Margett Purser (23.01), supported by IRO-MAR FS 05.33, be accepted in part, insofar as flood hazard management is a relevant consideration for any future development, but otherwise rejected as any relief seeking to alter the operative flood hazard mapping or information on a record of title for a property is outside the scope of PPC3.
247. I recommend that Adam Dekker (36.02) be accepted in part, insofar as identified flood risk may be capable of being appropriately managed through subsequent subdivision and development design but rejected to the extent that the submission seeks to alter or disregard the operative flood hazard mapping.

4.7.1 Section 32AA evaluation

248. In my opinion, the recommended amendments to the subdivision provisions relating to natural hazards and stormwater management are a more appropriate way to achieve the objectives of PPC3 than the notified provisions. In particular, I consider the amendments:

- a. provide clearer direction for urban subdivision to manage flood risk, including safe evacuation or refuge, existing flood management infrastructure, overland flow paths and the effects of increased stormwater runoff;
 - b. are effective and efficient because they establish the outcomes to be achieved while allowing site-specific investigation, engineering assessment and design to determine the appropriate response at subdivision stage;
 - c. will have additional assessment and design costs for subdivision, including demonstrating hydraulic neutrality and responding to identified flood constraints, but these costs are proportionate to the need to ensure that urban development does not increase flood risk to people, property or infrastructure;
 - d. avoid unnecessary duplication of the operative Natural Hazards Chapter and regional controls relating to stormwater discharges, while addressing matters directly associated with urban development enabled by PPC3; and
 - e. are supported by sufficient technical information to act on the submissions. The recommended provisions retain appropriate flexibility where detailed spatial and engineering information will only become available at subdivision stage.
249. Overall, I consider the benefits of providing greater certainty and reducing the potential for new urban development to increase flood and stormwater risk outweigh the additional assessment and design costs. The recommended amendments are therefore more appropriate for achieving the objectives of PPC3 and the purpose of the RMA than the notified provisions.

4.8 Key Issue 4: Transport

Overview

250. This section of the report covers submissions relating to the road network, including upgrades to intersections and amendments to provisions. Stantec provided an Integrated Transport Assessment which was Appendix 9 of the Section 32 Report. In response to submissions, James Whittaker from Stantec has provided further evidence in response to issues raised, attached as Appendix 8 to this report.

Matters raised in submissions- Key Issue 4 – Transport

251. Teresa Stoltz (08.02, 08.03 and 08.04) seeks various roading upgrades to walkways and intersections; Johnston Road in Marton, Calico Line and Bond Street in Marton, and High Street and Bridge Street in Bulls. IRO-MAR (FS.09) support submission 08.03 in part seeking access needs for the elderly to be addressed. NZTA (FS 01.04) and IRO-MAR (FS 05.10) both support in part submission point 08.04.
252. Lynne Sheridan (25.08, supported in part by NZTA FS 01.14) seeks provisions to ensure that new subdivisions are created in a grid roading pattern to complement our existing roading system unless it is geologically impossible. Roding in new subdivisions needs to be wide enough to ensure safe accessibility by all emergency vehicles when roadsides have vehicles parked there. Rangitikei Development Ltd (C/-

B. Simpson) (FS 03.11) opposes this submission and considers coordinated growth will be more beneficial.

253. IRO-MAR (29.06, supported in part by NZTA FS 01.17) seeks that new roads in subdivision are designed to relate to existing roading patterns and allow freedom of navigation, avoid headlights penetrating private property as they pass, and provide cycling and pedestrian links. Concern is raised with smaller lot sizes creating increased car use which is exacerbated by lack of public transport.
254. NZTA (11.01, supported by IRO-MAR FS 05.13) seek more information on the effect, funding and timing of intersection upgrades and potential caps on development (i.e. new dwelling or lot numbers), dependent on delivery of any identified intersection upgrades.

Assessment of submission points - Key Issue 4 - Transport

255. I note the roading upgrades referred to by Teresa Stoltz (08.02, 08.03 and 08.04). I acknowledge the submitter's concerns regarding the operation and safety of the transport network, and I agree that transport accessibility, connectivity and network capacity are important considerations when planning for future urban growth.
256. Transport effects associated with PPC3 were assessed through the Integrated Transport Assessment (ITA) prepared by Steven Jiang and reviewed by James Whittaker from Stantec and included as Appendix 9 to the Section 32 Report. The ITA reviewed the existing transport environment, assessed future traffic generation from the proposed growth areas and identified locations where transport improvements may be required over time to accommodate future growth. This assessment helped inform the Councils selection and refinement of the growth areas proposed through PPC3.
257. In response to submissions, Mr Whittaker has undertaken a further review (see Appendix 8) of the growth areas recommended in the Section 42A Report. His evidence confirms that the resulting transport effects associated with the recommended PPC3 provisions are generally lower than the upper development scenarios assessed through the original ITA. This reflects that several potential growth areas assessed through the ITA have not progressed in PPC3, and the reduction in overall development yield within the Marton North-West Structure Plan Area (part deletion of MAR01 as recommended in Section 4.9 below⁶) has reduced materially from the combined scenario assessed in the ITA.
258. The further evidence also confirms that transport effects differ between locations. For Bulls, the proposed extent of BUL02 is consistent with the smaller development scenario assessed through the ITA, while the revised yield for BUL03 is not expected to materially alter the original transport conclusions. For Marton, the reduction in development capacity within the Marton North-West Structure Plan Area reduces the overall traffic demand compared with the combined scenario originally assessed.
259. The further evidence nevertheless identifies transport matters that will require ongoing monitoring or future improvements as growth occurs. Many of the identified transport constraints relate to existing network conditions and background traffic growth rather

⁶ Note that the ITA was updated prior to the further reduction in MAR07.

than being directly attributable to PPC3. In my view, this distinction is important when determining whether a transport intervention should be addressed through PPC3, through subdivision design, or through future Council and NZTA Waka Kotahi transport planning and investment.

260. I consider PPC3 should identify and safeguard the strategic transport connections necessary to support the growth it enables, while the detailed design, timing, funding and delivery of individual road and intersection improvements are generally more appropriately determined through subdivision and infrastructure planning processes. Where state highway infrastructure is affected, this will also require coordination between Council and NZTA.
261. The District Plan includes a Transport Chapter which is relevant to all future development. In addition, future subdivision proposals may be required to provide a transport assessment to identify and assess effects on the transport network. Council therefore has appropriate mechanisms in place to assess transport effects through the resource consent process.
262. In relation to the locations identified by Teresa Stoltz, I acknowledge that some existing intersections and pedestrian connections may require future improvement. However, the transport evidence does not establish that the specific works sought by the submitter are necessary as a direct consequence of PPC3 or that they need to be prescribed through the District Plan before rezoning occurs. Where improvements are required, their nature, timing and funding will depend on actual development uptake, network performance and the responsibilities of the relevant road-controlling authority.
263. For these reasons, I do not recommend amendments to PPC3 requiring the particular road or intersection works sought by Teresa Stoltz. I recommend rejecting submissions from Teresa Stoltz (08.02, 08.03 and 08.04). I recommend accepting in part IRO-MAR (FS 05.09 and FS 05.10) and NZTA (FS 01.04), insofar as safe and accessible pedestrian connections and transport outcomes are relevant to future growth, but rejected to the extent that specific transport upgrades are sought through PPC3.
264. Lynne Sheridan (25.08) and IRO-MAR (29.06) both seek additional provisions requiring subdivision roads to follow a grid pattern, relate to existing roading networks, provide for pedestrian and cycling connections, accommodate emergency vehicle access, avoid vehicle headlights impacting adjoining properties, and generally provide for improved transport outcomes.
265. I agree that future development should provide for safe, efficient and connected transport networks. However, I consider that the ODP and Council's Land Development and Subdivision Standards already contain appropriate mechanisms to achieve these outcomes.
266. As confirmed by Mr Whittaker, subdivision layout and design is influenced by a range of factors including topography, existing development patterns, stormwater requirements, natural features, site constraints and development scale. Consequently, requiring all subdivisions to follow a grid road pattern would be unnecessarily prescriptive and may not result in the most appropriate design outcome in all circumstances.

267. SUB-R1 provides Council with control over subdivision layout, road access, connectivity, compatibility with the transport hierarchy and the achievement of good urban design outcomes. These matters enable Council to consider how new roads integrate with existing transport networks and provide for safe pedestrian, cycling and emergency vehicle access on a case-by-case basis.
268. Matters such as road widths, vehicle manoeuvrability, pedestrian and cycle facilities, and connections to the wider network are also considered through engineering standards and detailed subdivision design processes. Retaining flexibility within the District Plan allows transport solutions to be tailored to the circumstances of each site while still achieving appropriate transport outcomes. In addition, in the larger Marton North-West Structure Plan Area, the structure plan provides an additional mechanism for safeguarding strategic access points and coordinating an integrated movement network across multiple landholdings. Mr Whittaker considers that this remains appropriate notwithstanding the reduced extent of the structure plan area as outlined in Section 4.9.
269. I recommend accepting in part submission from Lynne Sheridan (25.08, supported in part by NZTA FS 01.14), insofar as new subdivision should provide a safe, connected and integrated transport network, including appropriate emergency vehicle access, but rejected to the extent that a mandatory grid road pattern is sought. I therefore do not recommend any amendments to the PPC3 provisions.
270. NZTA (11.01) seeks further information regarding the funding, timing and delivery of intersection upgrades and whether development should be capped until upgrades are completed.
271. I acknowledge NZTA's concern regarding the relationship between growth and transport infrastructure, including state highway performance. During informal discussions with NZTA staff in preparing this report, we discussed the reduced scale of development now recommended through the Section 42A Report, and the mechanisms available to manage transport effects arising from future growth.
272. As a result of the informal discussions, Council and NZTA agreed that a structure plan should be prepared for BUL02. The purpose of the structure plan is to provide greater certainty regarding the integration of future development with the transport network by:
- identifying the appropriate location or locations for vehicle access to BUL02;
 - directing vehicle access to the local road network; and
 - secure the no-access outcome and maintain the safety and efficiency of the State Highway corridor.
273. I consider that this is a more appropriate and proportionate response than imposing a cap on the number of dwellings or requiring intersection upgrades before rezoning. The structure plan will establish the strategic access and frontage outcomes required for BUL02, while allowing the detailed internal road layout, access design and any development-specific transport mitigation to be assessed when subdivision is proposed.
274. The structure plan should be read together with the applicable subdivision and transport provisions. Future subdivision will remain subject to resource consent,

including assessment of the proposed access arrangements, effects on the local and state highway networks, and any necessary transport mitigation. The proposed structure plan is shown in Figure 2



Figure 2: Watson Street (Bulls) Structure Plan

275. The further evidence prepared by Mr Whittaker also provides further assessment of the growth areas and development yields now recommended through the Section 42A Report and confirms that these are materially below the upper development scenarios assessed in the ITA.
276. In Bulls, the ITA assessed both a full development scenario for BUL02 of up to 490 lots and a reduced 116-lot scenario. It identified potential performance issues at the SH1/SH3 intersection under the larger BUL02 development scenario. However, the smaller BUL02 development extent enabled through PPC3 largely aligns with the 116-lot scenario assessed in the ITA, under which intersection performance was not substantially different from the future scenario without BUL02. The evidence also identifies that future deterioration at this intersection is expected as a result of background traffic growth irrespective of PPC3. As agreed above, a structure plan has been developed for BUL02 to ensure the concerns of NZTA and ensuring access to the to the local road network is secured.
277. In relation to the rezoning of part BUL02, the transport evidence also confirms that the principal mitigation measure is the provision of access via Watson Street and the

avoidance of direct vehicle access to SH1. Mr Whittaker considers that any necessary upgrades to Watson Street can be implemented as subdivision occurs and that these matters are appropriately addressed. This matter is further addressed under the relevant rezoning/Structure Plan assessment in Section 4.9.

278. In Marton, the ITA assessed a combined development scenario for MAR01, MAR02 and MAR07 of up to 1,244 lots. The recommendations in the Section 42A Report reduce the anticipated yield to approximately 547 lots, representing a reduction of around 44 percent. The evidence notes that transport modelling identified increased delays at the Bond Street/Broadway/Calico Line/Tutaenui Road intersection only under the larger development scenario assessed in the ITA. Accordingly, the transport demand arising from the recommended rezoning is expected to be materially lower than that previously assessed. While some local network improvements may ultimately be required as growth occurs, the evidence does not identify a transport capacity threshold arising from the recommended PPC3 development that warrants limiting the number of dwellings or allotments through the District Plan.
279. In relation to the Residential Intensification Area Overlay, the transport evidence estimates that a 10 to 20 percent uptake of the overlay provisions would enable approximately 71 to 142 additional dwellings across Bulls, Marton and Taihape. Applying the trip generation rates used in the ITA, this would result in only modest increases in traffic demand, equivalent to approximately one to two additional vehicle movements per minute in Bulls and Marton and less in Taihape. The evidence concludes that these effects would occur incrementally over time and would be readily accommodated by the existing transport network without giving rise to material adverse effects on network operation, capacity or safety.
280. Overall, the further transport evidence concludes that the associated transport effects are therefore less than those originally assessed.
281. In my view, the District Plan should not impose dwelling limitation linked to the future delivery of intersection upgrades. The transport effects of individual developments can be assessed through future subdivision and land use consent processes, where appropriate transport assessments can identify any site-specific mitigation requirements.
282. The ongoing monitoring, planning and funding of transport infrastructure upgrades is more appropriately addressed through Council infrastructure planning processes and continued coordination with NZTA.
283. I recommend accepting in part the submission from NZTA (11.01, supported by IRO-MAR FS 05.13), and introducing a structure plan for BUL02. Further transport assessment has been undertaken and ongoing monitoring and coordination between Council and NZTA regarding state highway performance and future transport investment is appropriate but rejected to the extent that development caps linked to the delivery of intersection upgrades are sought.

4.8.1 Section 32AA evaluation

Proposed Bulls Structure Plan

284. In my opinion, the proposed Bulls Structure Plan, is a more appropriate way to achieve the objectives of PPC3 compared to the notified provisions. In particular, I consider that the structure plan and map:
- a) provide clarity and consistency and allow for better alignment of issues.
 - b) will allow for plan users to more easily understand what is required, reducing time and cost spent on interpreting the provisions.
 - c) is considered to be more appropriate in achieving the purpose of the RMA than the notified version of the ODP.
285. Overall, I consider the introduction of the structure plan for BUL02 will provide greater certainty regarding the integration of future development with the transport network. The recommended amendments are therefore more appropriate for achieving the objectives of PPC3 and the purpose of the RMA than the notified provisions.

4.9 Key Issue 5: Rezoning and Structure Plans

Overview

286. This section of the report covers submissions relating to the growth areas and rezoning requests. Where relevant, the infrastructure evidence from Rob Smith (Appendix 6), transport evidence from James Whittaker (Appendix 8) and flooding evidence from Jon Bell (Appendices 7.1 – 7.6) has been referred to.
287. In evaluating rezoning requests, I have considered a range of key matters, including: the existing and proposed zoning pattern; accessibility to the town centre, existing transport networks, access, and services; infrastructure capacity (including Three Waters); transport and access constraints; site characteristics such as topography and natural hazards; and the planned character and amenity associated with the various residential zones.
288. I also draw submitters attention to Part 2 of the District Plan, which provides existing provisions for managing matters such as Transport, Three Waters and Natural Hazards, rather than the underlying residential zone itself. This is an important distinction, as the proposed growth areas which feature constraints do not automatically disqualify the land from being rezoned to residential, as there are additional provisions that apply across all zones.
289. Rezoning requests have also been considered in terms of their consistency with the broader zoning strategy and whether they support a coherent and logical spatial pattern. This includes avoiding ad hoc or isolated zoning changes unless there is clear site-specific justification.
290. Overall, this approach seeks to ensure that zoning decisions are robust, consistent with higher-order direction, and appropriately balanced between enabling development capacity and managing environmental and infrastructure constraints.

291. The assessment of the submission points raised for Key Issue 5 have been broken into the following sub-issues:
- Marton
 - Bulls
 - Marton North-West Structure Plan
 - Residential Intensification Areas
292. Each sub-issue is assessed in turn below, with recommendations provided for each sub-issue.

Table 4: Summary of Officer Recommendations for Key Issue 5

Provision(s)	Officer Recommendation(s)
Marton and Marton North-West Structure Plan	Amend to part remove MAR01 and MAR07. Create a new structure plan for part MAR01 – the Tutaenui Road Structure Plan. Amend to show the potential dam break scenario for HRC's W3 dam on MAR07 and the ponding extent for the dam located within MAR02.
Bulls	Amend to include a structure plan in accordance with NZTA's request.
Taihape	Retain as notified.
Residential Intensification Infill Overlay	Amend to remove the properties located in the flooding mapped areas.

4.9.1 Marton

Matter raised in submissions – Key Issue 5: Rezoning - MARTON

MAR01, MAR02 and MAR07 Growth Areas and Marton North-West Structure Plan

293. Simone and Robert Pauletic (21.01) support the rezoning of 98 Tutaenui Road (part of MAR01), Marton to General Residential, as notified. IRO-MAR (FS 05.31) opposes this submission due to the lack of infrastructure, three waters and amenities.
294. Dean and Teresa Cunningham (31.01, supported by IRO-MAR FS 05.50) oppose in part the Marton North-West Structure Plan in relation to 20 Tutaenui Road (MAR01), as this will require power pole relocation and the identified public open space would be on private property. Dean and Teresa Cunningham (31.02) oppose the rezoning of 20 Tutaenui Road, Marton and seek retention of General Rural Zone.
295. Belinda Howard (07.01) opposes the rezoning of MAR01 due to flooding risks. The submitter raises concerns with the existing dam that creates a 'lake' during heavy rainfall events, with particular concern for 10 Armagh Terrace. IRO-MAR (FS 05.07) supports this submission in part agreeing that stormwater services require upgrades for any future development.

296. Sarah Hasler (16.01) opposes the rezoning of MAR01 (inferred) to General Residential and seeks the retention of General Rural Zone for MAR01.
297. Mangapapa Trust No 2 (32.01, supported in part by NZTA FS 01.20, Rangitikei Development Ltd (C/- B. Simpson) FS 03.16 and IRO-MAR FS 05.51) oppose the rezoning of MAR01 and seek that it is deferred for at least 10 years. The submitter has suggested Rural Lifestyle Zone rather than General Residential Zone.
298. Reverend Robin W.K. Peirce (01.01, supported by IRO-MAR FS 05.01) opposes MAR02 (inferred) which seeks to rezone land down Wanganui Road from General Rural to Residential. The submitter considers light industrial and business prospects to be more suitable, as it would provide opportunities for young people due to the arable land.
299. David Johnson (17.01) opposes the rezoning of MAR02 (inferred) growth area to residential and seeks to retain it as General Rural. The submitter is concerned that this would impact their enjoyment and value of private property.
300. Rangitikei Development Ltd (18.01) support the rezoning of MAR02 and MAR07 to General Residential. IRO-MAR (FS 05.25) opposes this submission, no reasons have been provided.
301. Hayden Gould (30.01, supported in part by IRO-MAR FS 05.49) supports the rezoning of MAR02 and MAR07 growth areas from General Rural to General Residential. The submitter considers it to be beneficial and provides opportunities for local businesses and trades. IRO-MAR (FS 05.48) supports this submission in part, the submitter agrees there is an opportunity to develop land and increase economic profit. However, the submitter considered the need for a Development Contributions Policy to ensure infrastructure is contributed towards.
302. Teresa Stoltz (08.01) supports in part the rezoning of MAR07, subject to addressing flood risk. Rangitikei Development Ltd (FS 03.03) oppose this submission on the basis that development can be managed future planning, engineering design, and upgrades and oppose delaying growth. IRO-MAR (FS 05.08) supports this submission in part stating that some rural areas are better suited for intensification due to different flood risks and ground conditions.
303. IRO-MAR (29.08) support in part, the Marton North-West Structure Plan Area, subject to requiring amenities to be within 15 minutes walking distance.

Part MAR04 Growth Area – 60 Calico Line

304. Kilian O'Gorman (05.01) supports the rezoning of 60 Calico Line in Marton to be rezoned from Rural Lifestyle to Residential. Shelley Tysoe-O'Gorman (FS02.01) supports the submission. While IRO-MAR (FS 05.04) opposes the submission as the submitter notes existing flooding issues with Calico Line and considers a resource consent appropriate.
305. Jordan Caskey (09.01) opposes the rezoning of Calico Line in Marton, seeking the retention of General Rural Zone. The submitter considers it more appropriate to focus on the larger areas of land proposed to be rezoned in west Marton. IRO-MAR (FS 05.10) supports this submission.

306. Natasha Kirk (10.01) also opposes the rezoning of Calico Line, and seeks the retention of General Rural Zone. The submitter is concerned about neighbourhood character, impact on property values, increased traffic, light pollution, pressure on waterways and drinking water issues. NZTA (FS01.05) supports this submission in part as they also have concerns with the impact from increased traffic on SH1.

Assessment of submission points - Key Issue 5: Rezoning - MARTON

MAR01, MAR02 and MAR07 Growth Areas and Marton North-West Structure Plan

307. Submitters both support and oppose the proposed rezoning of land within the Marton North-West Structure Plan Area (referred to as MAR01, MAR02 and MAR07 growth areas under *Pae Tawhiti Rangitikei Beyond*, Council's Community Spatial Plan). Matters raised include the need for additional residential land, flood risk, infrastructure capacity, land use suitability, impacts on neighbouring properties, loss of rural land, development timing, provision of amenities, and the appropriateness of alternative zoning options.
308. Matters relating to infrastructure and natural hazards have been discussed in detail in Sections 4.6 and 4.7 of this report under Key Issues 2 and 3. This is supported by additional information in Section 4.4 of this report. Furthermore, evidence from Mr Smith (Appendix 6) and Mr Bell (Appendix 7.1 – 7.6) is attached to this report, which provides further evidence on infrastructure and flooding respectively. I have referred to this evidence as required in my response below.
309. As discussed under Key Issue 1, in response to submissions on population growth projections I have updated growth projections; the district's population is projected to increase to approximately 19,690 people by 2055. This represents an increase of approximately 3,690 people and an estimated requirement for approximately 1,608 additional dwellings (assuming 2.7 people per dwelling and an occupancy rate of 85%), or an average of approximately 54 additional dwellings per year across the district. The updated growth projections are materially lower than those relied upon when PPC3 was prepared.
310. In light of this updated evidence, I have reviewed the extent of the proposed growth areas to ensure PPC3 provides sufficient long term development capacity and housing choice without unnecessarily rezoning additional rural land. I have concluded that it is appropriate to reduce the area proposed for rezoning.
311. In considering where to reduce the growth areas in line with the updated growth projections, I have considered the distribution of residential development capacity across Marton and Bulls. The evidence indicates that the greatest opportunity to reduce greenfield capacity is within Marton, where existing General Residential zoned land, the Residential Intensification Area Overlay and the notified greenfield growth areas collectively provide substantial development capacity. By contrast, the growth areas proposed for Bulls are more limited in extent and continue to provide for the town's anticipated growth needs, including demand associated with its strategic location and accessibility. Accordingly, I consider that reducing the Marton greenfield growth areas represents the most appropriate response to the revised growth

projections while maintaining a balanced distribution of residential land supply across the district.

312. Within Marton, the Part MAR04 (60 Calico Line) rezoning is a logical extension of the urban area and provides a relatively small additional development capacity of a theoretical yield of approximately 20 lots. This property is currently zoned Rural Lifestyle and as such has limited productive value. Of note, Dalrymple Place provides access to future development, and it is a logical extension. This is discussed further under Part MAR04 Growth Area – 60 Calico Line below.
313. I have therefore focused on a review of the Marton North-West Structure Plan Area for the reduction of the growth areas, which includes MAR01, MAR02 and MAR07. In determining the appropriate extent of rezoning, I have considered the updated population and dwelling projections discussed under Key Issue 1, the extent of existing residential development capacity within Marton, the capacity provided through residential intensification, the suitability of the identified growth areas, the relationship of each area to the existing residential land, evidence from Mr Bell and the matters raised by submitters.
314. For context, the growth areas are shown in Figure 3 below, labelled MAR01, MAR02 and MAR07. These three growth areas formed the Marton North-West Structure Plan as notified under PPC3.

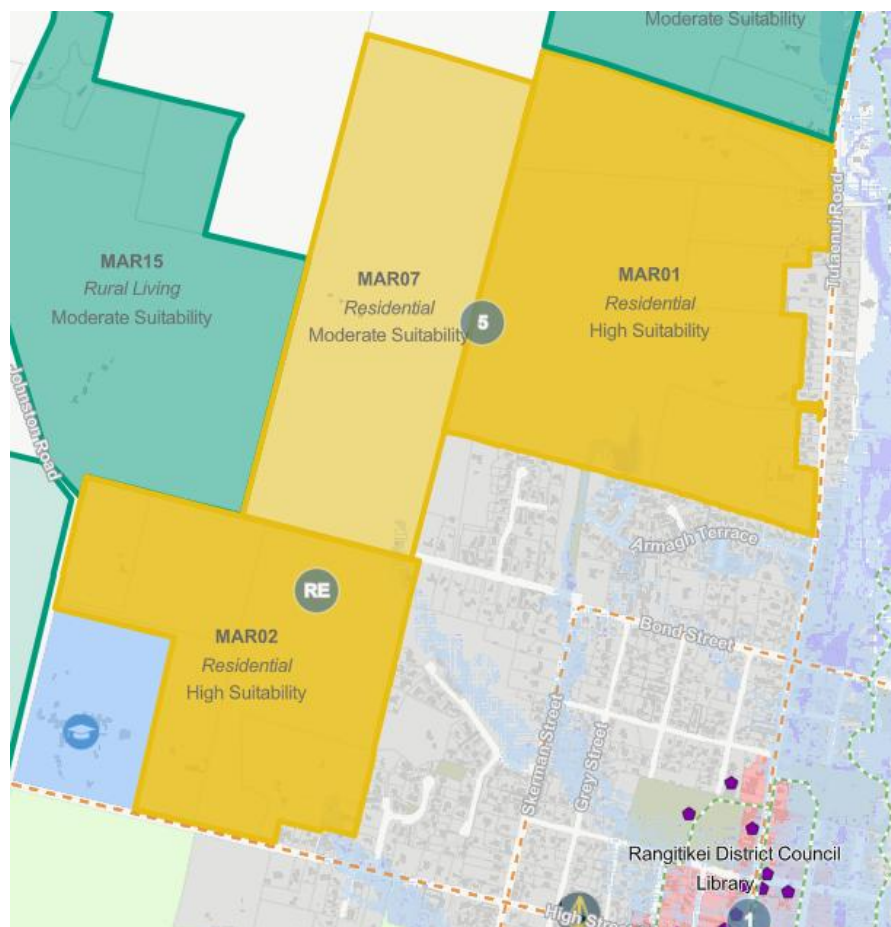


Figure 3: Growth Areas MAR01, MAR02 and MAR07 (in yellow) from the Pae Tawhiti Rangitikei Beyond

315. The submissions on MAR01 principally raise concerns regarding flood risk, infrastructure capacity, loss of rural land and the timing and extent of residential growth, while submissions on MAR02 and MAR07 raise matters including alternative land uses, neighbouring amenity, flood risk and infrastructure. There is also support for the residential rezoning of MAR02 and MAR07 and for part of MAR01.
316. I accept that the updated growth projections no longer justify the full extent of residential land notified under PPC3. The submissions seeking a reduction in the extent of urban expansion have merit insofar as they highlight the importance of ensuring that rezoning is proportionate to projected demand and does not unnecessarily convert rural land to urban purposes.
317. I agree with submitters that development of MAR02 will result in a change from the existing rural environment. However, I consider MAR02 remains a logical location for future urban expansion given its relationship to the existing urban area (including noting the location of Huntley School on the corner of Wanganui Road and Johnston Road), and forms part of the coordinated north-west growth pattern for Marton identified through the Community Spatial Plan and subsequent technical assessment. I have not identified an infrastructure, natural hazard, transport or other constraint of a nature or scale that makes General Residential zoning inappropriate. I therefore recommend retaining MAR02 as notified.
318. In relation to MAR 01 and MAR07, I have considered the updated growth projections alongside the submissions and technical evidence relating to flooding, stormwater, infrastructure capacity, and the existing HRC dams. While I do not consider that these matters establish either MAR01 or MAR07 as unsuitable for residential development, the materially lower population growth projections mean that the full extent of the notified rezoning is no longer required to provide sufficient long-term residential capacity. Accordingly, I consider it appropriate to reduce the extent of both MAR01 and MAR07, given their location, to align development capacity with forecast demand.
319. For MAR01 I recommend reducing the notified area substantially to retain the rezoning of just 96 and 98 Tutaenui Road. The primary reason for retaining these properties is due to their location, they currently sit between residentially zoned properties along Tutaenui Road, and they provide good spatial choice by providing for urban growth in this part of Marton.
320. In regard to MAR07 this growth area provides a necessary connection to Milne Street for MAR02, which is beneficial from both a resilience perspective (i.e. the access from Wanganui Road for MAR02 has a faultline running across it) and from a spatial planning perspective. It provides for good connectivity between MAR02 and MAR07 and into Marton's town centre. As such it is recommended that the lower portion of MAR07 (approximately 15.5ha) is retained and rezoned as General Residential.
321. I note that the recommended growth area reductions results in two distinct residential growth areas. I therefore recommend replacing the notified Marton Structure Plan with two separate structure plan areas: the Marton North-West Structure Plan Area (MAR02 and reduced MAR07) and the Tutaenui Road Structure Plan Area (96 and 98 Tutaenui Road). This better reflects the revised pattern of growth proposed through PPC3 and provides a clearer framework for the coordinated planning and development of each area.

322. Establishing two structure plans ensures that transport networks, stormwater management, open space provision, and urban design outcomes can be planned and integrated within the context of each growth area.
323. Both the reduced Marton North-West Structure Plan Area and the proposed Tutaenui Road Structure Plan Area (shown in Appendix 2 and below as Figure 4 and Figure 5) remain logical locations for future residential growth. Each area can integrate with, the existing urban area and can contribute to meeting Marton's future housing needs. While the areas will develop independently, the structure plans keep the key features that identify opportunities for future transport and movement connections. The structure plan features will no longer extend over the parts of MAR01 and MAR07 that are not proposed to be rezoned to residential, but the features within the structure plans will indicate the potential for growth to occur on the adjoining rural land as this land remains part of identified growth areas under *Pae Tawhiti Rangitikei Beyond* and may be developed in the future.
324. I am satisfied that the proposed approach achieves a more appropriate balance between providing development capacity and ensuring the efficient use of land to meet population growth demands until 2055.
325. Accordingly, as attached in Appendix 2 and shown in Figure 4 and Figure 5 below, I recommend reducing the extent of MAR07 and MAR01 (as outlined above) to be within the General Residential Zone.
326. The recommended growth areas provide sufficient development capacity and housing choice to meet Marton's projected long term housing demand. As such, I consider this represents a more proportionate and efficient planning response than the notified proposal.



Figure 4: Proposed Marton North-West Structure Plan



Figure 5: Proposed Tutaenui Road Structure Plan

327. I have also considered submissions seeking alternative outcomes, including retention of the General Rural Zone, deferred development, application of a Rural Lifestyle Zone, and suggestions that business or industrial activities would be a more appropriate use of the land. I consider General Residential zoning remains the most appropriate response. These areas relate logically to the existing residential environment and contribute to the planned long term residential growth pattern for Marton. Residential zoning is also consistent with the strategic direction established through *Pae Tawhiti Rangitikei Beyond* and the recommendations of the supporting technical work. I have not identified a sufficient planning or evidential basis to prefer rural lifestyle, business or industrial zoning, particularly given the proximity of these areas to existing residential activities and the potential for reverse sensitivity effects. Furthermore, with regards to rural lifestyle, as this land is LUC 3, clause 3.7 of the NPS-HPL directs Council to avoid rezoning highly productive land for rural lifestyle purposes (except as provided for in clause 3.10).

328. I acknowledge that residential growth will generate demand for open space, recreation, transport connections and community services over time. The Marton North-West Structure Plan Area and Tutaenui Road Structure Plan Areas provide strategic direction for public open space and movement connections, while detailed provision can be considered as subdivision proceeds. Existing community facilities are anticipated to accommodate growth as it occurs over time. Furthermore, the growth areas identify long term development capacity only and do not result in immediate development occurring. Matters such as parks, reserves, open space and active transport connections can continue to be addressed through Council's wider strategic planning framework, subdivision design and future infrastructure programmes. I do not consider the evidence identifies a need for additional community-facility zoning or provisions through PPC3.
329. As discussed above, I recommend accepting the submissions from Simone and Robert Pauletic (21.01), insofar as the residential zoning sought by this submission is retained as notified or amended as sought in relief. I recommend rejecting IRO-MAR (FS 05.31) insofar as the submission opposes the relief sought.
330. I recommend accepting in part the submissions from Rangitikei Development Ltd (18.01), IRO-MAR (FS 05.25), Hayden Gould (30.01, supported in part by IRO-MAR FS 05.49), Mangapapa Trust No 2 (32.01, supported in part by NZTA FS 01.20, Rangitikei Development Ltd (C/- B. Simpson) FS 03.16 and IRO-MAR FS 05.51) Belinda Howard (07.01), IRO-MAR (FS 05.07), Sarah Hasler (16.01), Teresa Stoltz (08.01), Rangitikei Development Ltd (FS 03.03) and IRO-MAR (FS 05.08) insofar as the area to be rezoned for MAR01 and MAR07 has been reduced in response to submissions.
331. I recommend accepting in part the submission from IRO-MAR (FS 05.49), insofar as the MAR07 growth area having development potential, but in part as development contributions are outside of scope as discussed under Section 4.5.
332. I recommend rejecting the submission from Reverend Robin W.K. Peirce (01.01, supported by IRO-MAR FS 05.01) and David Johnson (17.01), insofar as MAR02 is being retained as residential.
333. Dean and Teresa Cunningham (31.01 and 31.02) raise site-specific concerns regarding 20 Tutaenui Road, including the indicative public open space shown on the Structure Plan and potential relocation of power infrastructure. I acknowledge these concerns. However, indicative Structure Plan elements do not determine the precise location of future open space or require immediate works on private property. The detailed location of indicative elements and any consequential utility requirements can be considered through future subdivision design. I do not consider these matters provide a sufficient basis to exclude the property from the otherwise appropriate residential growth area. However, parts of MAR01 are no longer recommended to be rezoned at this time including 20 Tutaenui Road. The reasons for this are outlined above.
334. I recommend rejecting in part submissions Dean and Teresa Cunningham (31.02 and 31.01, supported by IRO-MAR FS 05.50), insofar as they oppose the residential zoning that is recommended to be retained as notified.

335. The submission from IRO-MAR (29.08) supports the Marton North-West Structure Plan Area in part, subject to future residents being able to access amenities within a 15-minute walking distance.
336. I agree with the underlying objective of providing a connected and accessible residential environment. *Pae Tawhiti Rangitikei Beyond* was developed specifically for the Rangitikei District and reflects the local settlement pattern, existing facilities and services, community priorities and aspirations for future growth. For Marton, it promotes planned housing growth, transport improvements, active mobility, quality community facilities and connections with the natural environment.
337. The Marton North-West Structure Plan responds to these principles by providing for coordinated residential growth, strategic vehicle access, active mobility routes and public open space. I consider this locally derived approach more appropriate than prescribing that all amenities must be within a fixed 15-minute walking distance. The growth area will function as an extension of Marton and will utilise existing facilities and services, supplemented by new facilities and connections as development and community needs evolve.
338. I therefore consider the Structure Plan, and associated subdivision provisions provide an appropriate framework for achieving a connected and accessible neighbourhood without an additional 15-minute accessibility requirement being necessary.
339. I recommend rejecting the submission from IRO-MAR (29.08) insofar as the 15-minute walking distance requirement be applied/required through PPC3.
340. Overall, I consider the updated growth evidence supports a more focused pattern of greenfield growth in Marton than that notified. Reducing MAR01 while retaining 96 and 98 Tutaenui Road reduces the extent of outward expansion while MAR02, part MAR04 (discussed below) and MAR07 provide sufficient additional greenfield capacity and locational choice. Having regard to the infrastructure, natural hazard and transport assessments discussed elsewhere in this report, I have not identified constraints that make residential zoning of the retained growth areas inappropriate. Detailed servicing, stormwater, access and subdivision-design matters will continue to be addressed through the applicable Structure Plan, District Plan and development approval processes. Accordingly, I recommended reducing the rezoning of MAR01 and MAR07 as shown in Figure 4 and Figure 5 above, and on the amended planning map in Appendix 2.

Part MAR04 Growth Area – 60 Calico Line

341. Kilian O'Gorman (05.01), supported by Shelley Tysoe-O'Gorman (FS02.01), supports the rezoning of 60 Calico Line from Rural Lifestyle to General Residential. Jordan Caskey (09.01), supported by IRO-MAR (FS05.10), opposes the rezoning and seeks retention of the General Rural Zone, considering that growth should instead be directed to larger growth areas in west Marton. Natasha Kirk (10.01), supported in part by NZTA Waka Kotahi (FS01.05), also opposes the rezoning and seeks retention of the General Rural Zone due to concerns regarding neighbourhood character, property values, traffic, light spill, infrastructure capacity and effects on waterways. IRO-MAR (FS05.04) opposes submission 05.01 due to concerns regarding flooding on Calico Line and considers resource consent should be required.

342. I acknowledge submitters' concerns regarding flooding, transport effects and the capacity of three waters infrastructure. These matters are relevant to determining whether part MAR04 is suitable for residential zoning and have been considered through the technical assessments supporting PPC3 and the further evidence discussed in the preceding sections. I have not identified a constraint of a nature or scale that makes General Residential zoning of 60 Calico Line inappropriate. In addition, as discussed in Section 4.4 of this report, any future subdivision of the site will require resource consent and will be subject to a detailed assessment of infrastructure servicing, stormwater management and network capacity. The subdivision provisions of the ODP also provide for consideration of the safety, efficiency and operation of the transport network, ensuring that site-specific effects can be appropriately assessed and managed at the development stage. As such, I disagree with those submissions that seek to oppose the rezoning on the basis of flooding, transport effects and the capacity of three waters infrastructure.
343. I acknowledge that submitters consider that residential growth should instead be directed to larger greenfield areas in west Marton. I do not agree that this is a reason to retain the Rural Lifestyle Zone for the Calico Line site.
344. The MAR04 growth area has already been reduced significantly from what was initially considered under the *Pae Tawhiti Rangitikei Beyond*. The assessments to define and reduce the growth areas considered a range of matters, including the ability of sites to integrate with the existing urban area, servicing, infrastructure, environmental constraints, and development feasibility.
345. The Calico Line site was identified as being suitable for residential development through that process and represents a logical extension of the existing urban area including existing access from Dalrymple Place. I therefore consider the proposed rezoning is consistent with the strategic planning undertaken for Marton's future growth.
346. I acknowledge concerns regarding changes to neighbourhood character, amenity, traffic and light spill. Rezoning from Rural Lifestyle to General Residential will result in a change in the anticipated character of the area if development occurs. However, MAR04 has been specifically identified as an appropriate location for residential growth through the spatial planning and technical assessment processes. The General Residential Zone and subdivision provisions provide the framework for managing the resulting built-form, amenity, access and servicing effects. I do not consider the concerns raised provide a sufficient basis to retain the Rural Lifestyle zoning.
347. I recommend accepting the submissions from Kilian O'Gorman (05.01), Shelley Tysoe-O'Gorman (FS02.01)
348. I recommend rejecting the submission from Jordan Caskey (09.01, supported by IRO-MAR FS 05.10), Natasha Kirk (10.01), NZTA (FS01.05) and IRO-MAR (FS 05.04) insofar they oppose the residential zoning that is recommended to be retained as notified.

4.9.2 Section 32AA evaluation

MAR01, MAR02 and MAR07 Zoning and Marton North-West Structure Plan

349. In my opinion, the amendments recommended to the Marton Growth Areas, Marton North-West Structure Plan and Tutaenui Road Structure Plan, are a more appropriate way to achieve the objectives of PPC3 compared to the notified provisions. In particular, I consider that the amended structure plan and map:
- a) better align the extent of greenfield residential growth with the updated population and dwelling projections, while retaining sufficient development capacity and housing choice through the remaining growth areas and existing urban capacity;
 - b) provide benefits by reducing the extent of rural and LUC 3 land converted to urban use, while retaining a coherent and logical pattern of future residential growth adjoining the existing Marton urban area;
 - c) any costs associated with reduced growth areas are outweighed by the benefits of better aligning the extent of greenfield growth with projected demand;
 - d) are effective in achieving the PPC3 objectives by retaining coordinated long term residential growth through the Structure Plan while reducing land that is not required to provide sufficient development capacity;
 - e) are efficient because they retain the Structure Plan framework for coordinating future land use, transport, open space and infrastructure across the remaining growth areas, while avoiding unnecessary urban expansion; and
 - f) are supported by sufficient information, including the updated growth assessment and technical evidence considered through this report, to justify the recommended amendments.
350. Overall, I consider the recommended amendments provide a more proportionate balance between enabling sufficient long-term residential growth and limiting unnecessary outward urban expansion. The amendments are therefore more appropriate for achieving the objectives of PPC3 and the purpose of the RMA than the notified areas to be rezoned and Marton North-West Structure Plan.

4.9.3 Bulls

Matter raised in submissions – Key Issue 5: Rezoning - BULLS

BUL03 Growth Area

351. Adam Dekker (36.01) supports the rezoning of BUL03 from General Rural to Residential. IRO-MAR (FS05.64) opposes this submission due to the infrastructure issues.
352. Adam Dekker (36.03) seeks to include the secondary rural title adjoining BUL03 in the rezoning from General Rural to General Residential. This is on the basis that it would provide land to support mitigation for the stormwater issues of BUL03.

353. Ashoka Masilamani (04.01, supported by NZTA FS 01.02 in part and supported by IRO-MAR FS 05.04) supports in part, the growth areas proposed to be rezoned from General Rural to Residential in Bulls, subject to provision for pedestrian/cycling access to connect the areas. The submitter raised concerns with George Street cul-de-sac which has no connection and considers this poor urban planning.
354. Ashoka Masilamani (04.02) also seeks a new pedestrian link to be included in the undeveloped section on George Street to connect to Flower Street, and future development to include pedestrian links to Johnson Street.

Assessment of submission points - Key Issue 5: Rezoning - BULLS

BUL03 Growth Area

355. Ashoka Masilamani (04.01, supported by NZTA FS 01.02 in part and supported by IRO-MAR FS 05.04) supports the rezoning from General Rural to General Residential, subject to provision for pedestrian / cycling access to connect the growth area to existing urban areas.
356. The submitter has used George Street as an example of a cul-de-sac which has resulted in 'poor urban planning' as it lacks connectivity, and the submitter is seeking a footpath / pedestrian connection as shown in Figure 6 below (04.02).



Figure 6: Indicative footpath sought in submission (04.02)

357. I agree in principle, that future development should provide for safe and efficient pedestrian, cycling and transport connections. However, I do not consider PPC3

should prescribe the precise alignment of an individual pedestrian connection where the detailed subdivision layout is not yet known. The subdivision framework within the PPC3 already requires consideration of transport network effects, including the provision of roads, accessways and connections, and ensures these matters are assessed at the resource consent stage when detailed design information is available. This enables the suitability of pedestrian, cycling and transport connections to be considered in the context of the final subdivision layout and its integration with surrounding development. Accordingly, I consider the notified provisions for PPC3 provide an appropriate mechanism to address these matters and recommend that the submission be accepted in part, insofar as its support of the rezoning of BUL03 to residential. However, I do not support amending District Plan provisions to require a specific pedestrian footpath and recommend that submission points 04.01 and 04.02 be rejected in part in relation to this request.

358. Adam Dekker (36.01) supports the rezoning of BUL03 from General Rural to Residential. IRO-MAR (FS05.64) opposes this submission due to infrastructure issues. Submitter 36 wants to integrate small commercial blocks and public spaces amongst their subdivisions. The infrastructure capacity of the BUL03 growth area was considered through the infrastructure assessment prepared by GHD. While detailed servicing requirements will need to be confirmed when subdivision is proposed, the infrastructure information before me does not identify a constraint of a nature or scale that makes residential zoning of part BUL03 growth area inappropriate. As such I recommend that IRO-MAR (FS05.64) be rejected.
359. I recommend rejecting in part the submission point from Ashoka Masilamani (04.01), and rejecting the submission points which supported this submission by NZTA (FS 01.02) and IRO-MAR FS (05.04) and rejecting Ashoka Masilamani (04.02), insofar as it is inappropriate to amend the District Plan provisions to require a specific pedestrian footpath. However, I accept in part Ashoka Masilamani (04.01) in relation to its support for the rezoning of BUL03 as identified in PPC3.
360. Adam Dekker (36.01) does not provide any detail about how he intends to integrate small commercial blocks and public spaces amongst the future development of his land. Regardless this plan change focuses on residential growth, and providing for commercial development opportunities would need to be addressed through a separate process. I recommend that submission point 36.01 be accepted in part, insofar as the submitter's support of the rezoning, but rejected in relation to PPC3 being an avenue to provide for commercial development in this growth area.
361. I recommend accepting in part the submission point from Adam Dekker (36.01), insofar as the submitter's support of the rezoning of BUL03, but rejected in relation to PPC3 being an avenue to provide for commercial development in this growth area. █

4.9.4 Residential Intensification Area Overlay

Matters raised in submissions – Key Issue 5: Rezoning – Residential Intensification Area Overlay

362. Lynne Sheridan (25.06) is seeking clarity on the reasons for the intensification areas. Ms Sheridan considers that subdivision in the residential zones should be on a case-

by-case basis to avoid creating 'ghettos' within our small town. There are also issues that come with intensification including infrastructure, requirement for porous surfaces, additional vehicle crossings and parking on site, neighbour noise (dogs / people), safety and congested roadside parking. Ms Sheridan asks how these issues will be mitigated. NZTA (FS 01.13) supports this submission in part, as the submitter also has concerns with the additional vehicle crossings onto SH1.

- 363. Stephan and Lynn Whitford (26.01, supported by IRO-MAR FS 05.38) seek to delete Oaklea Avenue, Marton from the Residential Intensification Area. There are concerns about the capacity of the infrastructure.
- 364. Maree Marshall (27.03, supported by IRO-MAR FS 05.41) opposes the Residential Intensification Area Overlay, in particular for Bond Street in Marton. There are concerns this would be out of character with the area and suggests this should be for new subdivisions so the people buying those sections anticipate it.
- 365. Te Runanga o Ngāti Tamakōpiri (28.01, supported by IRO-MAR FS 05.44) oppose the Residential Intensification Area Overlay in Taihape.
- 366. IRO-MAR (29.10) opposes the introduction of the Residential Intensification Area for Marton and Bulls. They are rural towns that have narrow roads. Smaller lots sizes would reduce vegetation and trees which effects heat loading, character, birdlife and increases impermeable areas.
- 367. IRO-MAR (29.11) support in part the Residential Intensification Area Overlay in Taihape due to the lack of residential land on level ground.
- 368. IRO-MAR (29.13) opposes the Residential Intensification Area Overlay in Bulls due to infrastructure problems.
- 369. Alan McCubbine (20.01, supported by IRO-MAR FS 05.30) opposes the growth areas and seeks consideration of the Residential Intensification Area, as this would remove the need to consult neighbours and give rise to overlooking, lack of carparking. The submitter wants to ensure that new developments need to consult neighbours.
- 370. HRC (35.04, supported in part by IRO-MAR FS 05.57) seeks an amendment to the Residential Intensification Area Overlay to exclude areas that overlap with the modelled inundated extent resulting from a potential failure of the Marton B Dam.

Assessment of submission points - Key Issue 5: Rezoning – Residential Intensification Area Overlay

- 371. The Residential Intensification Area Overlay is one component of PPC3's response to projected residential growth, alongside the proposed greenfield growth areas. As discussed earlier in this report, the forecast increase in dwellings is expected to occur progressively, with a relatively small number of additional dwellings anticipated each year. The overlay therefore provides longer term housing choice and capacity rather than anticipating widespread or immediate redevelopment of existing residential areas.
- 372. The intensification areas have been focused on existing General Residential zoned land in relatively central locations, where additional development can make more efficient use of existing urban land and provide opportunities for housing closer to

town centres, amenities and services. This approach is consistent with the wider PPC3 strategy of providing for growth through a combination of existing urban capacity, intensification and planned greenfield expansion. These benefits need to be balanced against the costs of intensification, including increased building density and impervious surfaces, reduced vegetation and openness, additional traffic and parking demand, and changes to privacy, outlook and existing residential character.

373. I acknowledge the concerns of Lynne Sheridan (25.06), Maree Marshall (27.03) and IRO-MAR (29.10) regarding these effects. PPC3 does not seek to retain the existing character of the Residential Intensification Areas as unchanged. Some change is an anticipated consequence of enabling smaller sites and additional housing. However, the GRZ and subdivision provisions seek to manage the effects of this change on the character and amenity of these towns in the Rangitikei, including through controls on site coverage, setbacks, building height and effects on neighbouring amenity, together with policy direction concerning the design and layout of infill subdivision. I consider these provisions provide an appropriate balance between enabling additional housing and managing the effects of that change.
374. Accordingly, I recommend rejecting the submission from Lynne Sheridan (25.06), insofar as the submission seeks changes to or removal of the Residential Intensification Area Overlay. Maree Marshall (27.03), supported by IRO-MAR (FS 05.41), be rejected, and the Residential Intensification Area Overlay applying to Bond Street, Marton be retained as notified.
375. I recommend rejecting the submission from IRO-MAR (29.10), insofar as it seeks removal of the Residential Intensification Area Overlay from Marton and Bulls. The overlay is retained subject to the recommended amendment to the Marton overlay area relating to the Marton B Dam failure inundation extent.
376. Lynne Sheridan (25.06) also suggests subdivision should be considered on a case-by-case basis, while Alan McCubbine (20.01, supported by IRO-MAR FS 05.30) raises concerns regarding overlooking, parking and neighbour consultation. All subdivision proposals require a resource consent and involve a case-by-case assessment against the applicable District Plan provisions, including permitted standards for future development. However, I do not consider that consultation or agreement from adjoining landowners should be required as a general prerequisite to subdivision. Effects on neighbouring amenity are appropriately managed through the applicable District Plan standards and resource consent framework. Similarly, while intensification contributes to housing capacity, I do not agree with Mr McCubbine that it removes the need for the identified greenfield growth areas. The projected demand is more appropriately provided for through a combination of infill and planned greenfield development. I recommend rejecting the submission from Alan McCubbine (20.01), supported by IRO-MAR (FS 05.30).
377. Stephan and Lynn Whitford (26.01) and IRO-MAR (29.13) raise concerns regarding infrastructure capacity at Oaklea Avenue, Marton and within Bulls respectively. As addressed earlier in this report, existing network constraints have been considered through the infrastructure assessments supporting PPC3, while infrastructure planning and investment will respond progressively as growth occurs. Individual subdivision remains subject to servicing requirements and will need to demonstrate

that it can be adequately serviced. Having regard to these mechanisms and the incremental rate of projected growth, I do not consider existing infrastructure constraints justify removing these areas from the overlay. I recommend rejecting the submission from Stephan and Lynn Whitford (26.01), supported by IRO-MAR (FS 05.38) and IRO-MAR (29.13).

378. I also acknowledge NZTA's concern (FS 01.13) regarding the potential for additional vehicle crossings onto SH1. The overlay does not itself authorise new crossings, and subdivision remains subject to the applicable access and transport provisions. These provide the appropriate mechanism for considering the safety and efficiency of individual access arrangements. I therefore do not consider the potential for additional access demand warrants removing otherwise appropriate land from the overlay. I recommend the submission from NZTA (FS 01.13) be accepted in part.
379. Te Runanga o Ngāti Tamakōpiri (28.01, supported by IRO-MAR FS 05.44) opposes the Residential Intensification Area in Taihape, while IRO-MAR (29.11) supports it in part given the limited availability of residential land on level ground. PPC3 provides an estimated maximum additional yield of 27 dwellings through the Taihape overlay. I consider retaining intensification opportunities in Taihape appropriate. In particular, more efficient use of existing residential land provides housing capacity where opportunities for outward urban expansion are constrained, while development remains subject to the applicable GRZ and subdivision provisions. I recommend rejecting the submission from Te Runanga o Ngāti Tamakōpiri (28.01), supported by IRO-MAR (FS 05.44). I recommend IRO-MAR (29.11) be accepted, insofar as it supports the Residential Intensification Area Overlay in Taihape.
380. HRC (35.04, supported in part by IRO-MAR FS 05.57) seeks to exclude land within the modelled inundation extent associated with potential failure of the Marton B Dam (Refer to Figure 7 below). I agree and I also note that one of the factors considered by Council when originally defining where the Residential Intensification Areas would be located was whether the properties were affected by flood hazard, unfortunately the potential failure of the Marton B Dam was not considered at this time. There is also the W3 dam breach scenario that has not been considered (refer to Figure 8 below). This overlay enables greater residential density and therefore has the potential to increase the number of people and properties exposed to the consequences of dam failure. Where alternative opportunities exist to accommodate projected growth, I do not consider it appropriate to specifically enable additional residential density within the modelled dam failure inundation extent.

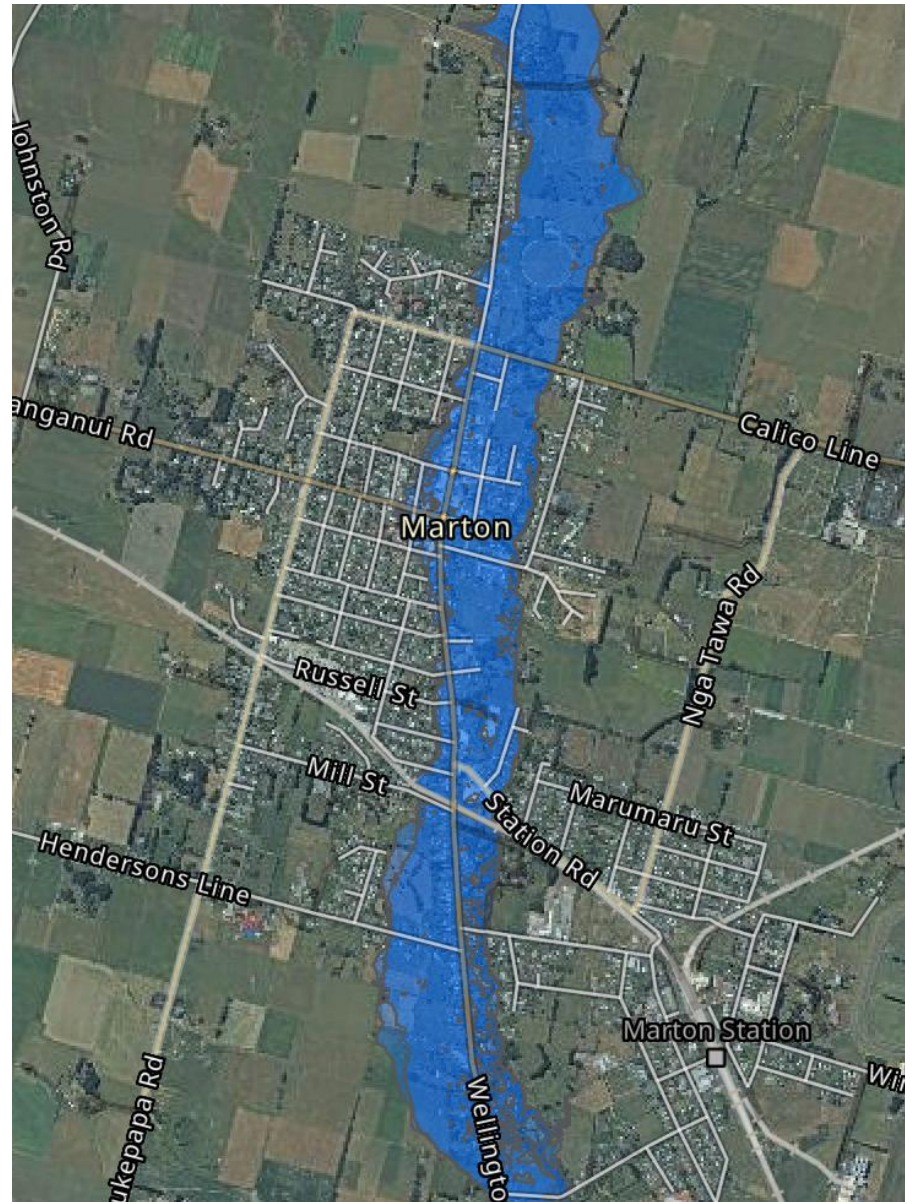


Figure 7: Marton B dam breach inundation extent (HRC)



Figure 8: W3 dam breach inundation extent (HRC)

381. I therefore recommend reducing the Marton Residential Intensification Area Overlay to exclude any properties within the modelled inundation extent of the Marton B Dam failure and the modelled W3 dam breach, attached as Appendix 3 and shown in Figure 9 below. This does not alter the operative flood hazard mapping or Natural Hazards provisions in the District Plan. Rather, it determines where the additional development opportunity introduced by PPC3 should apply. I recommend accepting the submissions from HRC (35.04), supported in part by IRO-MAR (FS 05.57).

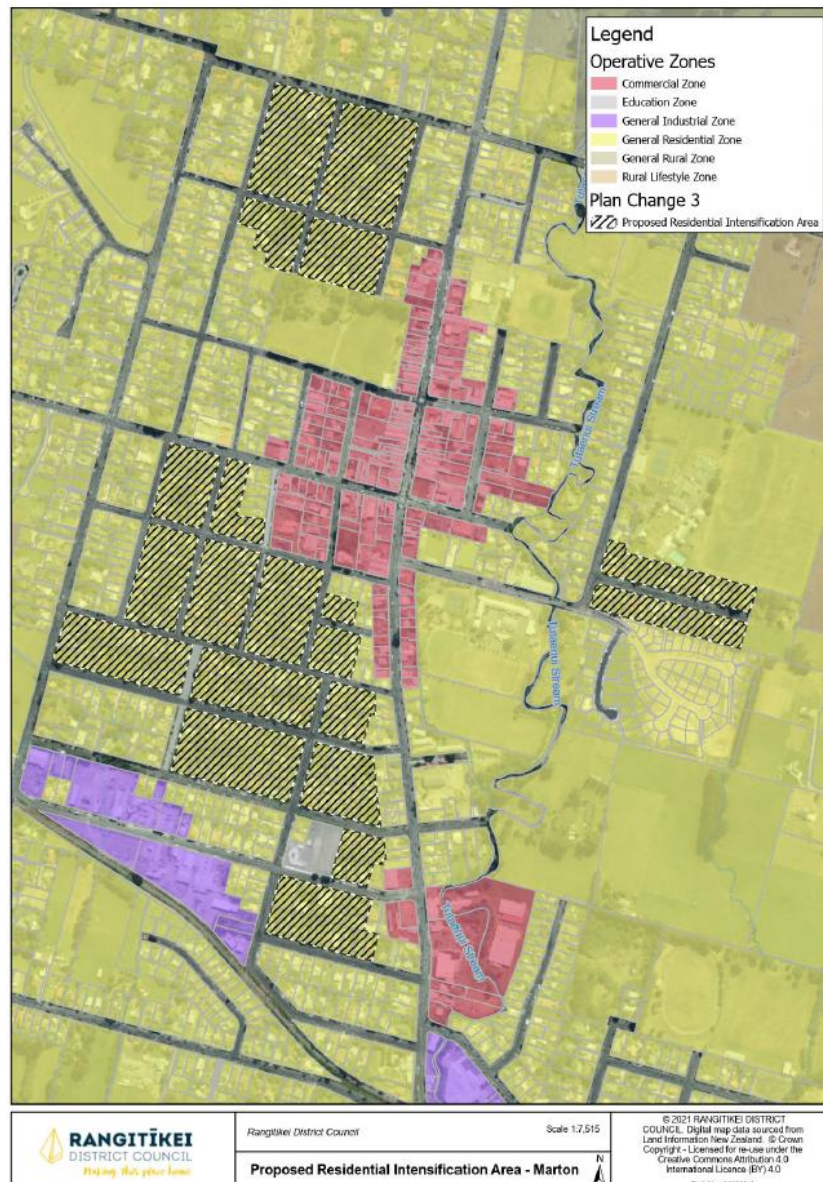


Figure 9: Amendments to the Residential Intensification Area Overlay

382. Overall, I consider the Residential Intensification Area Overlay remains an appropriate part of the growth strategy of PPC3, subject to the Marton B Dam and W3 Dam failure amendment. The overlay provides additional housing capacity and choice to established residential areas in relatively central locations and makes more efficient use of existing urban land and infrastructure while complementing, rather than replacing, planned greenfield growth. I acknowledge that intensification will result in incremental changes to the character and amenity of existing residential areas, but I consider those costs are appropriately balanced by the benefits of additional housing capacity and are managed through the applicable GRZ, subdivision, infrastructure and transport provisions.

4.9.5 Section 32AA evaluation

Residential Intensification Area Overlay in Marton

383. In my opinion, the recommended amendment to reduce the Residential Intensification Area Overlay in Marton to exclude the modelled Marton B Dam failure inundation extent and W3 dam breach inundation extent is a more appropriate way to achieve the objectives of PPC3 than the notified overlay. In particular, I consider that the amendment:
- a) provides benefits by reducing the potential for additional residential intensification to increase the number of people and properties exposed to the consequences of a potential dam failure;
 - b) retains sufficient opportunities for residential intensification elsewhere in Marton and, together with the proposed greenfield growth areas, continues to provide for projected residential growth and housing choice;
 - c) has a limited cost in terms of reduced development capacity within the affected area, which is outweighed by the benefit of avoiding additional residential density in an area subject to an identified natural hazard risk;
 - d) does not alter the operative flood hazard mapping or Natural Hazards provisions, but appropriately determines where the additional residential development opportunity enabled specifically by PPC3 should apply; and
 - e) is supported by sufficient technical information regarding the modelled dam failure inundation extent to justify the amendment.
384. Overall, I consider the recommended amendment provides a more appropriate balance between enabling residential intensification and managing natural hazard risk and is therefore more appropriate for achieving the objectives of PPC3 and the purpose of the RMA than the notified Residential Intensification Area Overlay.

4.10 Key Issue 6: Provisions and Performance Standards

Overview

385. This section of the report encompasses submissions seeking decisions in relation to issues, objectives, policies, rules, performance standards and matters of discretion on the General Residential, Rural Lifestyle and Subdivision provisions being amended under PPC3. The assessment of the submission points raised for Key Issue 6 have been broken into the following sub-issues:
- General Residential Zone
 - Rural Lifestyle Zone
 - Subdivision
 - Other Matters
386. Each sub-issue is assessed in turn below, with recommendations provided for each sub-issue.

4.10.1 General Residential Zone

Matter raised in submissions – Key Issue 6: Provisions and Performance Standards – General Residential Zone

GRZ-I1

387. David Johnson (17.03, supported in part by IRO-MAR FS 05.24), Tony Jury (22.01, supported in part by NZRA FS 01.11) and IRO-MAR (FS 05.32), Maree Marshall (27.01, supported by IRO-MAR FS 05.39), Margaret. Webster (33.01, supported in part by IRO-MAR FS 05.52) and Joanna Edmonds (34.01, supported in part by IRO-MAR FS 05.53) oppose the proposed PPC3 amendment to GRZ-I1 and seek to retain the operative wording of GRZ-I1.
388. New Zealand Defence Force (37.02) seeks amendments to GRZ-I1 or as a note to GRZ-S3 on the basis that GRZ-S3 allows a maximum height of 9.5m, however, plan users should have awareness of Base Ōhakea and MDEF-02 and the designation. The amended wording is proposed to include the following:

RNZAF Base Ōhakea is located approximately 3km south of Bulls. Areas within and in proximity to Bulls are subject to Designation MDEF-02 Height Restrictions RNZAF Base. Ōhakea. Permanent and temporary structures must not infringe the height limits imposed by the designation.

GRZ Objectives

389. Maree Marshall (27.02, supported by NZTA FS 01.15 and IRO-MAR FS 05.40) seeks to retain the wording “This includes the efficient use of existing infrastructure, and integration of pedestrian, cycling and vehicle transportation networks.” under GRZ-O1. The submitter considers the walkways to be important for the Rangitikei rural towns.
390. HRC (35.14 and 35.15) supports GRZ-O2 and GRZ-P7.

Standards

391. Reverend Robin W.K. Peirce (01.03) seeks a variety of houses to be built and references Vincent Holloway in Christchurch as an example. The submitter also seeks garages to be built at the rear of dwellings and infers amendments to the bulk and location standards of the Residential zone.
392. Neil Oldfield (14.03) opposes GRZ-S2 and seeks an amendment to require a 3m setback for dwellings to allow emergency services access.
393. Neil Oldfield (14.04, supported by IRO-MAR FS 05.17) seeks provisions for providing non-residential activities within the growth areas.
394. Fire and Emergency New Zealand (15.02, supported by IRO-MAR FS 05.20) seek the introduction of a new standard for compliance with the Fire and Emergency New Zealand code of practice GRZ-S8. The submitter highlights a gap between firefighting water supply and Council’s Subdivision and Land Development Code of Practice. Fire and Emergency New Zealand (15.01, supported by IRO-MAR FS 05.19) request an

amendment to GRZ-R1 to include reference to GRZ-S8 as a consequential result of this submission. The proposed wording is as follows:

GRZ-S8 - Servicing

- i All new buildings must be provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

Matters of discretion where this performance standard cannot be complied with:

- i The suitability of the proposed water supply for firefighting purposes including effects on people's health and safety, and on property.

Assessment of submission points - Key Issue 6: Provisions and Performance Standards – General Residential Zone

GRZ-I1

- 395. Several submitters oppose the proposed amendment to GRZ-I1 and seek retention of the operative wording.
- 396. I acknowledge the concerns raised by the submitters regarding the potential effects of residential development on neighbouring properties and local amenity values. The operative GRZ-I1 places a strong emphasis on protecting amenity values, including access to daylight, openness and freedom from unreasonable noise. While these matters remain important considerations within the General Residential Zone, PPC3 seeks to provide for future urban growth and a more efficient use of residential land within existing urban areas. The proposed GRZ Issues are based on the issues that became apparent through the development of *Pae Tawhiti Rangitikei Beyond* and Council's efficiency and effectiveness monitoring of the General Residential Zone.
- 397. The removal of the wording in GRZ-I1 does not mean that residential amenity is no longer managed. The General Residential Zone objectives, policies and standards continue to address matters including building height, setbacks, height in relation to boundary, site coverage, outdoor living space and effects on neighbouring amenity⁷. These provisions provide the appropriate framework for managing the effects of residential development while recognising the additional housing capacity and choice sought through PPC3. PPC3 intentionally enables additional housing choice, infill development and smaller residential sites in identified locations. Some change to existing residential character and amenity is therefore anticipated. In my view, retaining GRZ-I1 in its operative form would place undue emphasis on maintaining existing amenity values and would not appropriately reflect the balance sought through PPC3 between accommodating residential growth and managing its effects. I consider the notified GRZ Issues more appropriately reflect that planning context.
- 398. I recommend rejecting the submissions from David Johnson (17.03, supported in part by IRO-MAR FS 05.24), Tony Jury (22.01, supported in part by NZRA FS 01.11 and IRO-MAR FS 05.32), Maree Marshall (27.01, supported by IRO-MAR FS 05.39),

⁷ I note that some of these matters are subject to amendments during the transitional period as discussed under Section 3.2 of this report.

Margaret Webster (33.01, supported in part by IRO-MAR FS 05.52) and Joanna Edmonds (34.01, supported in part by IRO-MAR FS 05.53), insofar as amending the wording to GRZ-I1 as notified.

399. New Zealand Defence Force (37.02) seeks amendments to GRZ-I1 or GRZ-S3 to provide awareness of Designation MDEF-02 Height Restrictions RNZAF Base Ōhakea and the associated airspace restrictions applying to areas within and surrounding Bulls.
400. I acknowledge the submitter's concerns and agree that it is important that plan users are aware of the height restrictions associated with Designation MDEF-02. However, I do not support the relief sought.
401. The District Plan planning maps already identify Designation MDEF-02 and provide plan users with notice of the extent of the designation and the associated restrictions. In addition, the designation provisions prevail over the underlying zone provisions where there is any inconsistency between the two. As such, compliance with the designation is required regardless of the maximum building height permitted under GRZ-S3 (which are significantly more restrictive than the heights imposed in the designation).
402. I do not consider it necessary or efficient to repeat the designation requirements within the General Residential Zone provisions. Doing so would duplicate existing District Plan provisions and could create future plan maintenance issues if the designation were amended. In my view, the planning maps and designation chapter are the appropriate location for this information.

Accordingly, I consider that plan users are already provided with sufficient information regarding the location and effect of Designation MDEF-02, I recommend rejecting the submission from New Zealand Defence Force (37.02).

GRZ – Objectives

403. Maree Marshall (27.02) seeks to retain the wording "*This includes the efficient use of existing infrastructure, and integration of pedestrian, cycling and vehicle transportation networks*" under GRZ-O1. The submitter considers that walkways and connectivity are important within Rangitikei's rural towns.
404. I acknowledge the submitter's support for walkability and integrated transport connections. I agree that pedestrian and cycling connectivity can contribute positively to the function and accessibility of residential neighbourhoods. However, I do not support retaining the wording sought.
405. The proposed GRZ-O1 has been drafted to focus on the primary outcome sought within the General Residential Zone, being the provision of a variety of housing types, including papakāinga housing, which reflects community aspirations while recognising local character, amenity values and natural features. In my view, the objective as notified is clearer and more focused than the operative wording.
406. While the efficient use of infrastructure and integration of transport networks remain relevant planning considerations, these matters are addressed elsewhere within the District Plan framework, including the subdivision, transport and infrastructure provisions, and do not need to be repeated within GRZ-O1. Including the requested

wording would broaden the scope of the objective beyond its intended purpose and detract from the focus on housing outcomes.

- 407. Future development, subdivision design and infrastructure planning will continue to consider connectivity and accessibility where appropriate. Accordingly, I recommend rejecting the submission from Maree Marshall (27.02, supported by NZTA FS 01.15 and IRO-MAR FS 05.40).
- 408. HRC's (35.14 and 35.15) support for GRZ-O2 and GRZ-P7 is noted and I recommend accepting these submissions.

Standards

- 409. Reverend Robin W.K. Peirce (01.03) seeks a variety of houses and for garages to be built at the rear of dwellings and infers amendments to the bulk and location standards of the residential zone.
- 410. In relation to the reference to allowing a variety of houses, the District Plan framework already provides flexibility in bulk and location. Development is managed through standards such as setbacks, building height, height in relation to boundary, site coverage and other built-form controls, rather than prescribing specific architectural styles or house designs. This enables a variety of housing forms to be developed while managing effects on neighbouring properties and the wider streetscape.
- 411. Where a proposal does not comply with a relevant development standard, resource consent is required. This provides an opportunity to assess potential adverse effects, including privacy, shading, dominance and bulk, on a case-by-case basis and determine whether the particular design is appropriate.
- 412. In relation to garage location, requiring all garages to be situated to the rear of dwellings would significantly reduce design flexibility and may not be practical or efficient on all sites. The District Plan instead relies on built form and site layout standards to manage streetscape and amenity outcomes while allowing for a range of housing and garage configurations. I recommend rejecting the submission.
- 413. In relation to setbacks, Neil Oldfield (14.03) opposes GRZ-S2 and seeks an amendment to require a 3m setback for dwellings to allow emergency services access. The purpose of the setback standards is to manage residential amenity outcomes, including access to sunlight, outlook and separation between buildings, rather than to provide emergency vehicle access.
- 414. Emergency access requirements are more appropriately addressed through the subdivision process, where access arrangements, roads, rights-of-way and servicing are assessed in detail as part of the resource consent process. Subdivision provides the appropriate trigger to ensure lots can be safely accessed and serviced, including by emergency services where necessary.
- 415. Requiring a 3-metre setback on one side of every residential dwelling would impose an unnecessary blanket restriction, reduce development flexibility, and lack clear planning justification. Accordingly, I recommend no amendment to GRZ-S2.
- 416. I recommend rejecting the submission point from Reverend Robin W.K. Peirce (01.03) and Neil Oldfield (14.03), insofar as the District Plan provides sufficient flexibility and setbacks.

417. In regard to Mr Oldfield's (14.04) submission, I have reviewed the provisions for non-residential activities within the residential zone, which includes the proposed growth areas.

Provision	
GRZ-O4	Non-residential activities in the General Residential Zone are provided for which support the local community and are compatible with the character and amenity values of the zone.
GRZ-P3	Provide for non-residential activities in the General Residential Zone where this will not compromise either the character of the area or the amenity of the neighbourhood.

418. Furthermore, the following activities are permitted:

Provision	Permitted Activity
GRZ-R4	Home business
GRZ-R5	Primary produce sales
GRZ-R6	Retail activities in properties in Scott's Ferry, Koitiata, Turakina, Mangaweka, Utiku, Ōhingaiti and Mataroa
GRZ-R7	Visitor accommodation
GRZ-R8	Short-term accommodation

419. For other non-residential activities, applicants would need to apply for resource consent as a Discretionary activity. A discretionary activity status is considered appropriate in a Residential Zone because these other activities can have effects that are inconsistent with the primary purpose and amenity of residential areas. This seeks to manage noise, traffic, visual amenity and other nuisances.
420. As such, the GRZ chapter provides a pathway for business activities to establish within the residential zone where adverse effects can be appropriately assessed and managed, while protecting the primary purpose of the zone and the residential character and amenity of the surrounding environment. As such I do not recommend any amendment to the GRZ provisions to further allow businesses in the growth areas.
421. I recommend rejecting submissions from Neil Oldfield (14.04, supported by IRO-MAR FS 05.17), insofar as the GRZ chapter provides a pathway for business activities to establish within the General Residential Zone where adverse effects can be appropriately assessed and managed and no further amendments are considered necessary.
422. Fire and Emergency New Zealand (15.02, supported by IRO-MAR FS 05.20) seek the introduction of a new standard "GRZ-S8" for compliance with the Fire and Emergency New Zealand code of practice. A consequential amendment to GRZ-R1 is sought to reference this new standard (15.01, supported by IRO-MAR FS 05.19)
423. I acknowledge the importance of ensuring that development can be adequately serviced with a firefighting water supply. However, I do not support the relief sought to the extent that it would require compliance with a specific firefighting water supply standard.

424. I have sought advice from Council's Development Manager on this matter (Appendix 6). That advice notes that the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509 is a voluntary standard and has not been formally adopted by Rangitikei District Council. Furthermore, there is currently no corresponding level of service or performance measure within Council's Annual Plan relating to firefighting water supply capacity.
425. I also note that responsibility for the operation and management of reticulated water infrastructure is expected to transfer to Central Districts Water. Future levels of service and performance measures may therefore change over time. In my view, incorporating a specific reference that has not been adopted by the Council is inappropriate.
426. For subdivisions, Council's current practice is generally to assess whether proposed lots are located within an appropriate distance of an existing fire hydrant, rather than requiring detailed demonstration of compliance with a specific firefighting water supply standard. This reflects the scale of development and the level of information typically available at subdivision stage.
427. While I support the intent of ensuring that firefighting water supply is considered as part of subdivision and development design, I consider any District Plan provision should remain sufficiently flexible to allow Council, Fire and Emergency New Zealand, and future water service providers to determine the most appropriate servicing response based on the circumstances of the development and the available infrastructure.
428. Accordingly, I do not support a performance standard requiring compliance with a specific firefighting water supply code. If the Hearing Panel considers additional direction is required, I would support a more general provision requiring consideration of firefighting water supply availability and emergency service access without reference to a particular external standard.
429. I recommended rejecting the submissions from Fire and Emergency New Zealand (15.01, supported by IRO-MAR FS 05.19 and 15.02, supported by IRO-MAR FS 05.20) insofar as this is not an adopted policy from RDC and this is something that can be assessed through existing subdivision and development processes.

4.10.2 Rural Lifestyle Zone

Matter raised in submissions – Key Issue 6: Provisions and Performance Standards – Rural Lifestyle Zone

430. HRC (35.10) seeks an amendment to RLZ-S1 to align with the Ecology Constraints Study (Appendix 10 of the Section 32 Report). The submitter seeks to amend the setback similar to GRUZ-S8:
- Buildings or structures must not be constructed within:
- a. 15 metres of a river, lake edge, or wetland.
431. HRC (35.11, 35.12 and 35.13) support in part RLZ-O2, RLZ-O4 and RLZ-P1 subject to the relief sought in submission point 35.03. This relates to RPS HAZ-NH Policy

10(4)(b), and as addressed in Section 4.7 of this report, the relief sought under submission 35.03 is supported.

Assessment of submission points - Key Issue 6: Provisions and Performance Standards – Rural Lifestyle Zone

- 432. PPC3 as notified already includes a 15-metre setback from any waterbody under RLZ-S1. PPC3 also introduces GRZ-S2.1.f. which requires buildings to be setback from any water body by at least 5m. The reduced setback for the General Residential Zone aims to provide a balance. It is considered that it will still provide water bodies with a 'buffer' (which also has a maintenance function where that water body acts as a drain) whilst not imposing a stringent blanket setback of 15m within the Residential zone where sites are typically much smaller than rural or rural lifestyle sites. This approach is consistent with the intent of the recommendations of the Ecology Constraints Study and provides an appropriate mechanism to protect ecological values while providing certainty for future development.
- 433. In my view, the recommended wording is preferable as it provides a more comprehensive and consistent approach to managing the interface between development and freshwater environments. The relief sought by the submitter is provided for through the recommended amendments.
- 434. Accordingly, I recommend that submission HRC (35.10) be accepted in part, as the relief sought is provided under RLZ-S1 and GRZ-S2.1.f that provides a 5m setback which is appropriate for the General Residential Zone.
- 435. HRC's (35.11, 35.12 and 35.13) supports RLZ-O2, RLZ-O4 and RLZ-P1 is noted, and as addressed in Section 4.7 of this report, the relief sought under submission 35.03 is supported. Accordingly, I recommend that submissions HRC (35.11, 35.12 and 35.13) be accepted.

4.10.3 Subdivision

Matter raised in submissions – Key Issue 6: Provisions and Performance Standards – Subdivision

- 436. Reverend Robin W.K. Peirce (01.02, opposed by Rangitikei Development Ltd (C/- Bain Simpson) FS 03.01 and supported by IRO-MAR FS 05.02) seeks to amend SUB-S5.1 to require larger lot size for properties on the urban edge of the Wanganui Road entrance to Marton.
- 437. Neil Oldfield (14.01, supported by IRO-MAR FS 05.16) supports the rezoning of 56 Wanganui Road, Marton, subject to an amendment of SUB-S5a requiring a minimum site area being 500sqm. Rangitikei Development Ltd (C/- Bain Simpson) (FS 03.03) opposes this submission.
- 438. Hilary Powell (13.01, supported by IRO-MAR FS 05.15) opposes a SUB-S5.3 which provides for a minimum 250sqm site area within the Residential Intensification Area.
- 439. IRO-MAR (29.14) support in part SUB-S5 subject to meeting criteria such as impermeable area, bulk and location, fencing and services.

440. Fire and Emergency New Zealand (15.03, supported by IRO-MAR FS 05.21) supports SUB-P8 in so far as it ensures the staging of development does not occur out of sequence with the delivery of necessary infrastructure extensions and/or upgrades, and seeks that it is retained as notified. NZTA (FS 01.08) supports this submission in part and seeks that the sequence, staging and funding is part of the structure plan.
441. Fire and Emergency New Zealand (15.04, supported by IRO-MAR FS 05.22) seeks to amend SUB-R1.2 as follows:
- SUB-R1.2.
- Matters over which discretion is restricted:
-
- g. The extent to which there is capacity for connection to existing reticulated essential services and the sufficiency of the proposed water supply (including firefighting water supply), sewage disposal and stormwater services.
442. Fire and Emergency New Zealand (15.05, supported by IRO-MAR FS 05.23) seeks to amend SUB-S2 as follows:
- SUB-S2 Essential services
1. The development must provide the following connections for each allotment:
- a. A potable water supply, including connection to a reticulated supply of potable water where this is available within 50 metres of the allotment.
- aa. All new residential lots must be provided with a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

Assessment of submission points - Key Issue 6: Provisions and Performance Standards – Subdivision

443. Reverend Robin W.K. Peirce (01.02, opposed by Rangitikei Development Ltd FS 03.01 and supported by IRO-MAR FS 05.02) has requested larger section sizes for properties on the urban edge at the Wanganui Road entrance. They refer to recent local subdivisions being too small and resulting in high fences to provide for privacy and inadequate outdoor living spaces. IRO-MAR (FS05.01) supports this submission. Rangitikei Development Ltd (C/- Bain Simpson) (FS03.11) oppose this submission and supports the 400sqm minimum lot sizes as proposed.
444. Similarly, Neil Oldfield (14.01, supported by IRO-MAR FS 05.16 and opposed by Rangitikei Development Ltd (C/- Bain Simpson) FS 03.03) is seeking an amendment to SUB-S5a to require a minimum site area being 500sqm. The entrance to Wanganui Road is specifically referenced as well, seeking larger lots.
445. The proposed rezoning of the Wanganui Road entrance from rural to residential is considered appropriate in this setting. The land south of Wanganui Road is zoned residential and is rural lifestyle in character. Furthermore, the site is bordered by residential development to the east and Huntley School to the west, forming a natural transition between existing urban development and the surrounding rural environment.

446. While Reverend Robin W.K. Peirce seeks larger section sizes at the urban edge, it is not considered necessary or appropriate to impose larger minimum lots than those proposed. The 400sqm minimum lot size provides sufficient flexibility to achieve a range of housing types while maintaining residential amenity outcomes through other provisions relating to building coverage, setbacks, landscaping, outdoor living space, and height controls. The 400sqm minimum lot size is also intended to facilitate the efficient use of this land when it is developed.
447. Accordingly, the relief sought by Reverend Robin W.K. Peirce (01.02), and supported by IRO-MAR (FS05.01), is rejected. The submission of Rangitikei Development Ltd (C/- Bain Simpson) (FS03.11) is accepted. I recommend accepting the submission from Rangitikei Development Ltd (C/- Bain Simpson) FS 03.01 and FS 03.03, insofar as they opposed submissions being rejected.
448. Hilary Powell (13.01, supported by IRO-MAR FS 05.15) opposes the 250sqm minimum lot sizes for the Residential Intensification Areas.
449. The Residential Intensification Areas have been specifically identified as areas capable of accommodating greater residential intensity due to location, lot sizes and proximity to services. The 250sqm minimum site area supports housing diversity and more efficient use of existing infrastructure while reducing reliance on greenfield expansion. This lot size was selected by Council as it aligned with the pattern of development for smaller more dense infill developments consented during the period assessed for the monitoring undertaken by Council.
450. I also note that development within the Residential Intensification Areas remains subject to other standards controlling building bulk, height, setbacks, outdoor living space, site coverage and servicing. Accordingly, I consider the proposal appropriately balances housing enablement with residential amenity and recommend the submission be rejected. I recommend rejecting the submission from Hilary Powell (13.01, supported by IRO-MAR FS 05.15).
451. The support from IRO-MAR (29.14) for SUB-S5 in part, subject to matters including impermeable surfaces, bulk and location, fencing and servicing being appropriately managed. I agree that these matters are relevant to the effects of subdivision and subsequent development. However, they do not all need to be incorporated into the minimum site-area standard itself. They are addressed through the applicable GRZ, subdivision, infrastructure and stormwater provisions, including the additional stormwater provisions recommended under Key Issue 3. I therefore do not recommend further amendment to SUB-S5. I recommend accepting in part the submission from IRO-MAR (29.14).
452. I support the relief sought by Fire and Emergency New Zealand (15.03, supported by IRO-MAR FS 05.21) and confirm that SUB-P8 appropriately recognises the importance of ensuring that development occurs in a manner that aligns with the provision of necessary infrastructure, including extensions and upgrades where required.
453. I acknowledge the further submission by NZTA seeking that the sequencing, staging and funding of infrastructure be addressed through Structure Plans. While I agree that infrastructure planning is an important consideration for future urban development,

PPC3 does not propose Structure Plans as an implementation mechanism for infrastructure sequencing, staging or funding. Rather, these matters will be addressed through infrastructure planning, funding decisions, development agreements, servicing assessments, and the subdivision and resource consent processes where appropriate as outlined in Sections 4.4 and 4.6 of this report.

454. In my view, SUB-P8 appropriately recognises the need to align development with the provision of infrastructure without requiring detailed sequencing, staging or funding provisions to be incorporated into Structure Plans. Accordingly, I recommend Fire and Emergency New Zealand (15.03, supported by IRO-MAR FS 05.21) be accepted in relation to their support of SUB-P8 and NZTA (FS 01.08) be rejected as PPC3 does not propose Structure Plans as an implementation mechanism for infrastructure sequencing, staging or funding.
455. Fire and Emergency New Zealand (15.04, supported by IRO-MAR FS 05.22) seeks to amend SUB-R1.2 to specifically include firefighting water supply in the text. I disagree with this and consider the reference to ‘water supply’ to sufficiently provide for firefighting water supply. Public reticulated (piped) water networks are designed and managed to provide both everyday drinking water and adequate pressure and volume for fire hydrants. Local authorities and water entities coordinate with Fire and Emergency New Zealand (FENZ) to meet specific fire code standards.
456. Fire and Emergency New Zealand (15.05, supported by IRO-MAR FS 05.23) seeks to amend SUB-S2. This is similar to the relief sought under Section 4.10.1. Advice from Council's Development Manager confirms that SNZ PAS 4509 is a voluntary code which has not been formally adopted by Rangitikei District Council. Council does not currently maintain a corresponding level of service or performance measure requiring compliance with this standard.
457. Furthermore, responsibility for water service delivery is expected to transition to Central Districts Water, which may establish different service levels in the future. Referencing a specific external standard within the District Plan would reduce flexibility.
458. I consider firefighting water supply is more appropriately addressed through the subdivision assessment framework, engineering approval processes, and consultation with relevant service providers. Accordingly, I recommend rejecting the submissions from Fire and Emergency New Zealand (15.05, supported by IRO-MAR FS 05.23) and Fire and Emergency New Zealand (15.04, supported by IRO-MAR FS 05.22), insofar as this is not an adopted policy from RDC and will be addressed through existing process around the assessment of the water network as part of subdivision and development.

4.10.4 Rainwater Collection Tanks

Matter raised in submissions – Key Issue 6: Provisions and Performance Standards – Rainwater Collection Tanks

459. Lynne Sheridan (25.03, supported by IRO-MAR FS 05.36) seeks to amend provisions to require a 2000L rainwater collection tank to be required for all new dwellings.

Assessment of submission points - Key Issue 6: Provisions and Performance Standards – Rainwater Collection Tanks

460. Lynne Sheridan (25.03, supported by IRO-MAR FS 05.36) seeks a requirement for all new dwellings to provide a minimum 2,000 litre rainwater collection tank. I acknowledge that rainwater collection can provide benefits, including reducing demand on the reticulated potable water supply and assisting with the management of stormwater runoff.
461. While the principle of installing rainwater tanks onsite has benefits for water supply and flooding management, making this a performance standard under PPC3 is not appropriate. Stormwater management solutions - including soakage systems, centralised ponds, and other devices - must be tailored to the receiving environment, downstream flood risks, and site-specific investigations such as soil permeability and infiltration capacity. These considerations are addressed during the subdivision design and consenting stages, where infrastructure needs are assessed under the controlled activity framework.
462. The benefits and costs of requiring rainwater tanks, and specifically a minimum 2,000 litre capacity, have not been quantified through PPC3. In my view, a mandatory rainwater-tank requirement should therefore be considered as part of a wider assessment of options for reducing demand on the potable water supply and managing stormwater. This would enable the effectiveness, costs and benefits of rainwater tanks to be compared with alternative demand-management and stormwater solutions before a particular method is required.
463. PPC3 already provides mechanisms for managing water supply and stormwater effects associated with growth. SUB-S2 requires each allotment to provide a potable water supply and a system for the collection and disposal of surface water. As discussed elsewhere in this report, I have also recommended strengthening the subdivision provisions to require hydraulic neutrality, or an equivalent stormwater management outcome, for urban subdivision. These provisions establish the necessary outcomes while allowing the appropriate servicing and stormwater response to be determined having regard to the particular development.
464. For these reasons I recommend rejecting the submission from Lynne Sheridan (25.03), supported by IRO-MAR FS 05.36.

4.10.5 Ecological Matters

Matter raised in submissions – Key Issue 6: Provisions and Performance Standards – Ecological

465. HRC (35.08, supported in part by IRO-MAR FS 05.61) agrees with the Ecological Constraint Study by Boffa Miskell and considers that provisions should be introduced to maintain features within the landscape that provide habitat or act as ecological corridors that may be used by bats, birds or lizards.

Assessment of submission points - Key Issue 6: Provisions and Performance Standards – Ecological Matters

466. HRC (35.08, supported in part by IRO-MAR FS 05.61) seeks provisions to maintain landscape features that provide habitat or ecological corridors that may be used by bats, birds or lizards. I note that no draft wording of these provisions has been provided.
467. I acknowledge the submitters intent to retain existing vegetation and other habitat features, and agree that these can provide ecological benefits, including maintaining habitat and ecological connectivity as urban development occurs.
468. However, the existing and proposed District Plan framework also provides mechanisms for considering the ecological features. SUB-R1 specifically provides for consideration of effects on indigenous vegetation, lakes, rivers and wetlands when subdivision is assessed. PPC3 also proposes setbacks from waterbodies within the General Residential and Rural Lifestyle Zones, consistent with recommendations arising from the Ecological Constraints Study. The Section 32 evaluation concluded that PPC3 responds to the relevant regional biodiversity direction, noting that no rare, threatened or at-risk habitats were identified within the growth areas.
469. The ecology report did not identify particular terrestrial habitat or ecological corridors within the PPC3 area that require protection through additional District Plan provisions. While shelterbelts, mature trees or other vegetation may provide habitat or connectivity benefits, a general requirement to retain landscape features that may be used by bats, birds or lizards would also be difficult to apply without information identifying the ecological value, location and function of those features.
470. Retaining such features could provide benefits through maintaining habitat, ecological connectivity and amenity as urban development occurs. Conversely, a mandatory retention requirement may also impose costs by constraining subdivision layout, development capacity or infrastructure design. The extent of those costs, and the ecological benefits that would result from retaining particular features, have not been quantified and are uncertain on the information available. In my view, there is therefore insufficient evidence to determine that a general retention requirement would be an effective and efficient response, particularly given the mechanisms already available through the District Plan to manage identified ecological values.
471. I therefore do not recommend additional provisions requiring the retention of landscape features as habitat or ecological corridors through PPC3. This does not diminish the potential ecological benefits of retaining such features where appropriate. Rather, a more targeted approach would require further assessment to identify the ecological values and connectivity functions sought to be protected and to consider the benefits and costs of regulatory and non-regulatory options.
472. I recommend that HRC (35.08), supported in part by IRO-MAR FS 05.61, be accepted in part, insofar as the submission identifies the benefits of maintaining habitat and ecological connectivity as urban development occurs, but rejected to the extent that additional regulatory provisions are sought through PPC3.

4.11 Key Issue 7: Other Matters

Overview

473. The submissions grouped under 'Key Issue 7: Other Matters' do not fall within a broader thematic category. I have broken the matters raised by submitters into sub-issues and assessed and made recommendations for each sub-issue. The sub-issues are as follows:

- Community Infrastructure.
- Open space, recreation areas, reserves, and tree retention.
- RNZAF Base Ōhakea and reverse sensitivity effects.

474. These sub-issues and the submissions within them are discussed and assessed in turn below.

Matters raised by submitters: Community Infrastructure

475. IRO-MAR (29.03) seeks clarity on why PPC3 only provides for residential development, and what uses are being planned to support the anticipated growth including schools and businesses.

Assessment of submission points: Community Infrastructure

476. IRO-MAR (29.03) questions why PPC3 focuses on residential growth and raises concerns regarding the capacity of schools, healthcare facilities, community infrastructure and other public services to support the anticipated population. I acknowledge that residential growth can increase demand for community facilities and services. However, the updated growth projections indicate a modest increase in population over the long term, and the anticipated development is expected to occur incrementally over many years rather than as a single large-scale urban expansion. This gives healthcare and education service providers ample time to consider and respond to the growth, if any specific response is needed. I have not identified evidence demonstrating that the growth enabled by PPC3 creates a specific need to zone or otherwise provide additional land for schools, healthcare or other community facilities through this plan change.

477. The planning and provision of these community facilities and services also involves Council and other relevant service providers and occurs through their respective strategic, investment and funding processes as population and demand change. For example, the Council would consider and determine any future investment in community infrastructure through Council's Long-Term Plan. PPC3 does not prevent community facilities or services from being provided where they are required and otherwise consistent with the applicable District Plan provisions. I therefore do not consider that additional provisions or zoning are necessary through PPC3 in response to submission 29.03. Accordingly, I recommend rejecting the submissions from IRO-MAR (29.03).

Matters raised by submitters: Open Space, Recreation Areas, Reserves and Tree Retention

478. Lynne Sheridan (25.07, supported by IRO-MAR FS 05.37) seeks that the aesthetics of Marton include street trees, the amount of green space, the quieter pace of life and

the fact that children can walk to school and ride their bikes around town are the things that make people want to live here. The submitter seeks to ensure that the treescape of Marton is continued.

- 479. David Johnson (17.02) seeks a 15-20m wide reserve and / or walkway along 12 Dunallen Avenue, within MAR02 / the Marton North-West Structure Plan Area, to preserve their enjoyment of their property and benefit the wider community.
- 480. Neil Oldfield (14.06) seeks additional recreation areas within the growth areas and clarification for whether provision has been made for parks or walking areas.
- 481. Similarly, Reverend Robin W.K. Peirce (01.04) seeks restrictions on the removal of trees and investment in recreation spaces.

Assessment of submission points: Open Space, Recreation Areas, Reserves and Tree Retention

- 482. Several submitters seek additional reserves, recreation areas, wider reserve margins, street trees, and stronger controls on tree removal.
- 483. In relation to the protection of trees, the ODP provides specific protection for identified notable trees and any proposal to remove these would require resource consent.
- 484. Generally, I acknowledge the benefits of retaining existing trees and providing additional street trees as development occurs. However, Council's ability to introduce general tree-protection rules in built environments is constrained by sections 76(4A)–(4D) of the RMA. These provisions prevent blanket tree-protection rules applying to built environment allotments and generally require protected individual trees, or qualifying groups of trees, to be specifically identified in a schedule to the District Plan together with the affected allotment or allotments. No assessment has been undertaken through PPC3 to identify additional individual trees or groups of trees warranting scheduled protection. I therefore do not consider that additional regulatory tree-retention provisions are appropriate through PPC3. Council can continue to manage and provide street trees through its Urban Tree Plan 2017 and associated asset management and operational processes.
- 485. In relation to providing recreation areas and wider reserve margins, the Marton North-West Structure Plan identifies indicative locations for public open space within the structure plan area. This provides strategic direction for open space to be incorporated as subdivision proceeds, while retaining flexibility to determine its precise location, extent and design, having regard to the eventual subdivision layout and community needs. The Subdivision Chapter also provides mechanisms for considering pedestrian connectivity, and where relevant, esplanade reserves or esplanade strips associated with waterbodies. These mechanisms complement, rather than replace, Council's wider planning and provision of parks and recreation reserves.
- 486. Council's wider parks and reserves network is planned and managed through processes outside the District Plan, including reserve management, asset planning and funding processes. Given the projected scale and gradual uptake of residential growth anticipated through PPC3, I do not consider it necessary or appropriate for PPC3 to prescribe additional recreation areas or general reserve requirements

beyond the strategic direction already provided through the Marton North-West Structure Plan and the applicable subdivision provisions.

487. Overall, I consider that PPC3 and Council's wider reserves and tree management processes provide an appropriate framework for responding to the matters raised. I do not recommend additional regulatory tree protection provisions or specified recreation or reserve areas through PPC3.
488. I recommend accepting in part the submissions from Lynne Sheridan (25.07, supported by IRO-MAR FS 05.37), Reverend Robin W.K. Peirce (01.04) and Neil Oldfield (14.06).

12 Dunallen Avenue - buffer / walkway

489. David Johnson (17.02) seeks a 15-20-metre-wide reserve and/or walkway adjacent to 12 Dunallen Avenue within the Marton North-West Structure Plan Area (growth area MAR02), both to preserve enjoyment of the property and to provide a wider community benefit.
490. I acknowledge the potential benefits of providing open space and pedestrian connections as the area develops. However, I do not consider there is sufficient justification to prescribe a specific reserve or walkway of a particular width and location adjacent to this property through PPC3. I do note that the location of a Horizons Regional Council dam on 30 and 56 Wanganui Road (situated to the west of 6-12 Dunallen Avenue) could potentially constrain development in the area that the submitter has raised. This would be a matter to consider and address if this area was proposed for subdivision.
491. The purpose of PPC3 is to establish an appropriate zoning framework for future growth rather than determine the detailed design and layout of future subdivision. The location, extent and design of reserves, walkways and public open spaces can be assessed comprehensively at subdivision stage, having regard to the wider subdivision layout, site constraints, pedestrian connectivity and open-space requirements.
492. The Subdivision Chapter already provides Council with the ability to consider reserves, esplanade strips, pedestrian connectivity and open space outcomes through the subdivision assessment process. In addition, the Marton North-West Structure Plan identifies indicative locations for public open space, providing sufficient direction for future development without prescribing a specific reserve width or alignment at this stage.
493. Accordingly, I do not recommend any amendments to PPC3 in response to this submission. I recommend rejecting the submission from David Johnson (17.02)

Matters raised by submitters: RNZAF Base Ōhakea and reverse sensitivity

494. NZDF (37.01 and 37.04) is neutral on PPC3, provided that PPC3 is amended to appropriately recognise the importance of RNZAF Base Ōhakea and protects its continued safe and efficient operation. NZDF requests that RNZAF Base Ōhakea and MDEF-02 be considered and addressed in the Section 32 analysis for PPC3.

Assessment of submission points: RNZAF Base Ōhakea and reverse sensitivity

495. NZDF (37.01 and 37.04) is neutral on PPC3 provided that the importance of RNZAF Base Ōhakea is appropriately recognised and its continued safe and efficient operation is protected. NZDF identifies the height restrictions applying to Bulls through Designation MDEF-02 and raises potential reverse-sensitivity effects associated with aircraft noise. It seeks additional reference to RNZAF Base Ōhakea and MDEF-02 within the General Residential Zone provisions.
496. I accept the strategic importance of RNZAF Base Ōhakea and the need for urban growth at Bulls not to compromise Base Ōhakea's continued safe and efficient operation. The Bulls Residential Intensification Area Overlay and proposed General Residential growth areas are affected by Designation MDEF-02, which establishes obstacle limitation surfaces associated with aircraft operations at RNZAF Base Ōhakea. This designation imposes controls on the height of buildings, structures, masts and trees associated with the safe operation of aircraft. The designation map and extent are shown below in Figure 10.

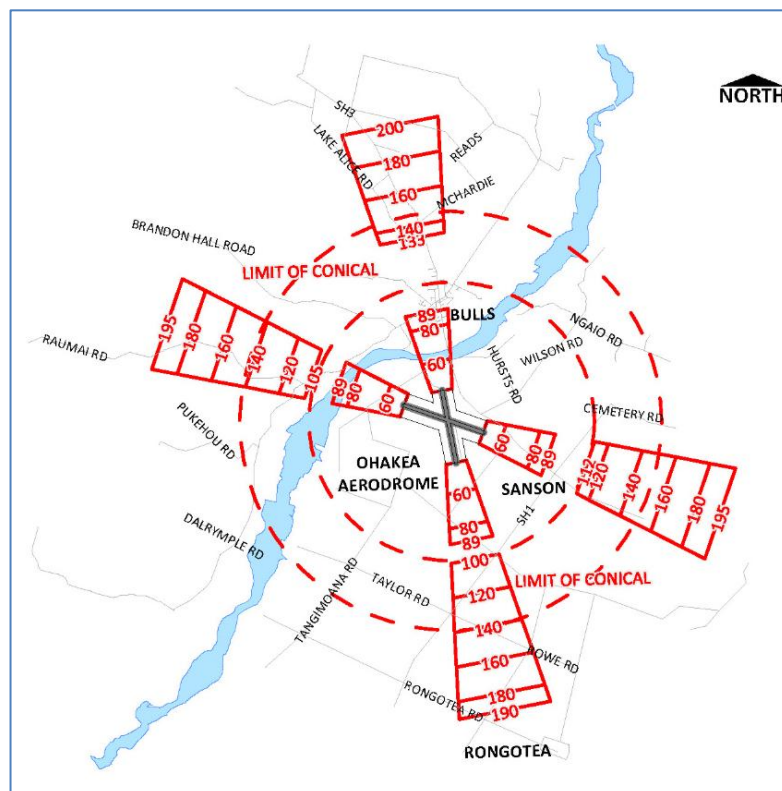


Figure 10: Designation MDEF-02

497. Designation MDEF-02 is already shown on the District Plan planning maps, and its requirements apply independently of the General Residential Zone provisions. The height limits established by the designation (which range upwards from 60m) are also substantially greater than the maximum building height of 8m enabled within the General Residential Zone. Furthermore, the General Residential Zone maximum building height is lower than the 10m maximum building height enabled in the General Rural Zone. Which means the land being rezoned in Bulls will be subject to stricter maximum building heights than it is currently.

498. I do not consider that repeating or cross-referencing the designation through introductory text or a note to the General Residential Zone standards would materially improve the management of effects or provide sufficient additional benefit to warrant an amendment to PPC3.
499. NZDF also identifies the potential for reverse-sensitivity effects associated with aircraft noise as additional residential development occurs at Bulls. I acknowledge that aircraft operations can generate noise beyond RNZAF Base Ōhakea and that increasing residential development has the potential to increase the number of people exposed to those effects. Unlike the obstacle limitation surfaces, however, there is no identified noise contour or existing noise-control framework for RNZAF Base Ōhakea within the Rangitikei District Plan, and NZDF has not sought specific noise standards or other reverse-sensitivity controls through PPC3.
500. I therefore recommend that NZDF (37.01 and 37.04) be accepted in part, insofar as the importance and continued safe and efficient operation of RNZAF Base Ōhakea are relevant considerations for urban growth at Bulls. However, I recommend that the specific relief seeking additional reference to RNZAF Base Ōhakea and Designation MDEF-02 within the General Residential Zone provisions be rejected, as the designation is already identified on the planning maps and applies independently of the zone provisions. No additional provisions relating to aircraft noise or reverse sensitivity are recommended.
501. I recommend accepting in part the submissions from NZDF (37.01 and 37.03), insofar as the existing designation provides protection for the RNZAF Base Ōhakea.

5 Conclusion

502. This report has provided an assessment of submissions received in relation to PPC3. The primary amendments that I have recommended relate to:
- *Amend the Planning Maps to reduce the extent of MAR01, while retaining 96 and 98 Tutaenui Road, and MAR07 within the General Residential Zone.*
 - *Amend the Planning Map to revise Marton North-West Structure Plan to:*
 - *reflect the reduced extent of MAR01 and MAR07; and*
 - *identify existing flood and stormwater management infrastructure.*
 - *Amend the Planning Maps to introduce a new Structure Plan for part MAR01 as this area is now separate from the Marton North-West Structure Plan area (which includes MAR02 and part MAR07). This new Structure Plan shall be labelled the Tutaenui Road Structure Plan.*
 - *Amend the Planning Maps to introduce a Structure Plan for BUL02. This new Structure Plan shall be labelled the Watson Street Structure Plan.*
 - *Amend the Planning Maps to reduce the Residential Intensification Area Overlay in Marton to exclude land within the modelled Marton B Dam failure inundation extent and W3 Dam extent.*

- *Amend the Subdivision Chapter to introduce a new policy requiring residential and rural lifestyle subdivision affected by flood hazards to provide safe and practicable evacuation routes, or where this is not practicable, appropriate safe refuge.*
- *Amend the Subdivision Chapter to introduce a new policy requiring integrated stormwater management for residential and rural lifestyle subdivision, including maintaining existing overland flow paths and flood and stormwater management infrastructure.*
- *Amend SUB-S2 Essential Services to require residential and rural lifestyle subdivision to achieve hydraulic neutrality, or an equivalent stormwater management outcome demonstrated through site-specific assessment and modelling.*
- *Amend the Subdivision provisions to require sufficient land to be provided for stormwater management infrastructure necessary to service urban subdivision.*

503. Section 5 considers and provides recommendations on the decisions requested in submissions. I consider that the submissions on PPC3 should be accepted, accepted in part, or rejected, as set out in my recommendations of this report and in Appendix 5.

504. I recommend that provisions be amended as set out in Appendix 1 [Appendix numbers 1.1, 1.2, 1.3] for the reasons set out in this report.

Recommended by: Catherine Nichol, Planning Consultant, Boffa Miskell

Reviewed and approved by: Tiffany Gower, Strategy Manager / Rangitikei District Council

Date: Monday, 5 October 2026