

Submission on Proposed Plan Change 3: Urban Growth Rangitikei District Plan

Clause 6 of First Schedule, Resource Management Act 1991

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Submission

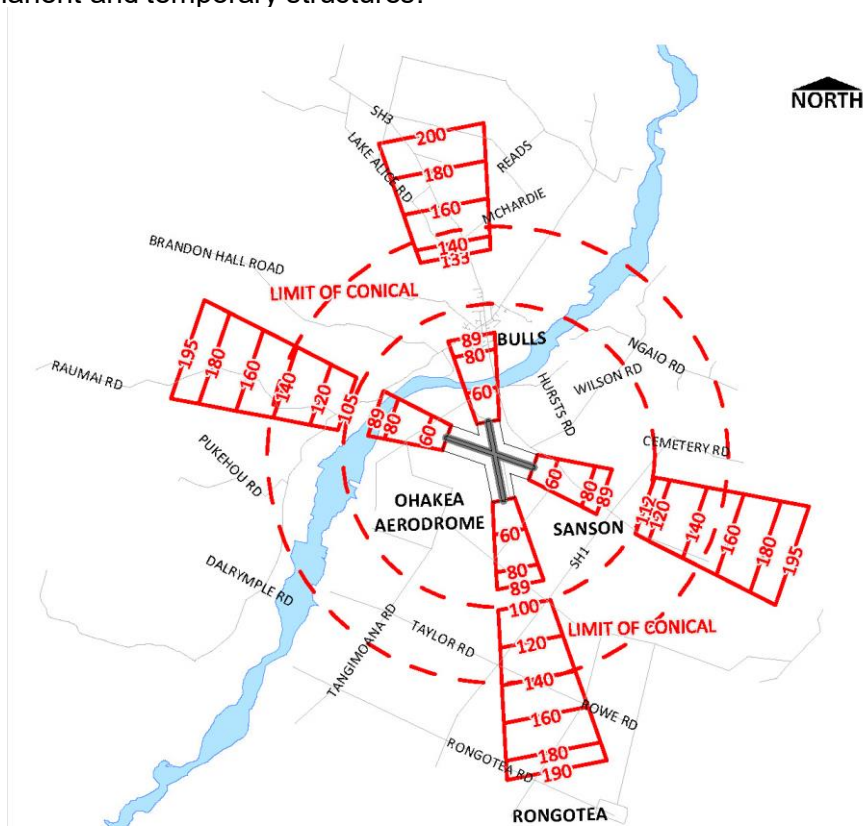
1. This submission on Proposed Plan Change 3: Urban Growth (PC3) relates to:
 - a. Residential intensification in the General Residential Zone in Bulls; and
 - b. The rezoning of land on the edge of Bulls to General Residential Zone.
2. The New Zealand Defence Force (NZDF) operates the Royal New Zealand Air Force Base Ōhakea (RNZAF Base Ōhakea) which is located approximately 3 km south of Bulls. While RNZAF Base Ōhakea is located in the Manawatu District, height restrictions (identified as Obstacle Limitation Surfaces) are included in the Rangitikei District Plan through Minister of Defence Designation MDEF-02.
3. RNZAF Base Ōhakea is a significant defence facility of regional and national importance. It is designated for Defence Purposes in the Manawātū District Plan and is of strategic importance both nationally and internationally. It is one of three Air Force Bases in New Zealand and home to New Zealand's third longest runway. It is the permanent operating and training base for several RNZAF squadrons and is used as a base for wider core capabilities such as maritime patrol and maritime search and rescue. The continued safe and efficient operation of RNZAF Base Ōhakea into the future is essential to achieving statutory Defence purposes under section 5 of the Defence Act 1990. Those purposes include the defence of New Zealand and the provision of assistance to the civil power in times of emergency.
4. When preparing District Plan provisions, Rangitikei District Council is required to give effect to the National Policy Statement for Infrastructure, particularly Policy 10, and the Regional Policy Statement, particularly Objective UFD-O3 and Policy UFD-P4,

and ensure the operation of RNZAF Base Ōhakea is not compromised (extracts are included in Appendix 1 and 2). There is currently no mention of RNZAF Base Ōhakea or MDEF-02 in the District Plan other than in the designations chapter itself.

- NZDF is neutral on PC3, provided that the Plan Change appropriately recognises the importance of RNZAF Base Ōhakea and protects its continued safe and efficient operation.

Height restrictions

- The Bulls Residential Intensification Area and new General Residential areas are within Designation MEDF-02 Height Restrictions RNZAF Base, Ohakea. MDEF-02 sets height limits in the areas around RNZAF Base Ōhakea, as shown in the Ohakea Aerodrome Height Thresholds diagram in the designation (copied below). The purpose of these height restrictions is to protect aircraft safety by ensuring that no obstacles obstruct the flight paths of aircraft. The height restrictions apply to both permanent and temporary structures.



The height of every building, structure, mast, trees or similar object shall be so restricted that every point thereof shall not penetrate any of the climb, transitional or horizontal surfaces associated with Ohakea Airfield.

These surfaces are shown on this diagram as:

- A wedge shape inclined plane rising at a gradient of 1 in 50 from their origin at the end of the airfield
- A transitional surface on either side of the climb surface sloped at a gradient of 1 in 7.
- A horizontal surface being the circular plan extending 4000 metres from the airfield at an altitude of 45 metres above (A.R.P.) (Alt 89.620 A.M.S.L.) and the circular plane extending out 6000 metres at an altitude of 115 metres above A.R.P. (Alt 159.620 A.M.S.L)

NOTE:

Aerodrome reference point (A.R.P) level 44.620 A.M.S.L Coordinates 703731.1m, 291371.87m

7. The height limit in the General Residential Zone (GRZ-S3) is 8m (with an additional 1.5m allowed for features such as chimneys and aerals). PC3 proposes to provide for residential intensification through smaller minimum lot sizes in identified Residential Intensification Areas (250m² rather than 400m²). While changes are proposed to standard GRZ-S3, NZDF understands that the maximum height is proposed to remain 9.5m. Regardless of maximum heights permitted under the District Plan, approval from the Minister of Defence (as the requiring authority for MDEF-02) is required for any proposed breach of height restrictions set under MDEF-02 (pursuant to section 176(1)(b) Resource Management Act).

Noise

8. Aircraft operations at RNZAF Base Ōhakea produce noise which can extend beyond the boundaries of the designation into the surrounding environment. RNZAF Base Ōhakea is therefore vulnerable to reverse sensitivity effects caused by the establishment of new noise sensitive activities nearby. This is a particular risk where residents new to the area may not be aware of noise effects from the Base, resulting in complaints or actions against the lawful operation of the Base. Ultimately, reverse sensitivity effects could result in pressure to change or constrain use of the Base, and compromise its continued operation. It is therefore important to acknowledge that there is potential for noise effects from RNZAF Base Ōhakea to extend beyond its boundaries, and to recognise that RNZAF Base Ōhakea must be protected from reverse sensitivity effects.

Relief

9. NZDF requests that RNZAF Base Ōhakea and MDEF-02 be considered and addressed in the Section 32 analysis for PC3.
10. To increase awareness of Base Ōhakea and MDEF-02, and to assist Plan users to understand the effect of the designation, NZDF requests that PC3 is amended to reference RNZAF Base Ōhakea and designation MDEF-02. This could be achieved through the insertion of text in the General Residential Zone chapter e.g. through amendment to GRZ-I1, through the addition of introductory text and/or as a note in GRZ-S3. Suggested text is below:

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, Ohakea. Permanent and temporary structures must not infringe the height limits imposed by the designation.

NZDF **could not** gain an advantage in trade competition through this submission.

NZDF **wishes to be heard** in support of this submission.

If others make a similar submission, **we will consider** presenting a joint case with them at the hearing.

R Davies

Date: 13/04/2026

Person authorised to sign
on behalf of New Zealand Defence Force

Appendix 1: National Policy Statement for Infrastructure

Policy 10: Planning for and managing the interface and compatibility of infrastructure with other activities

- (1) Decision-makers on planning instruments must manage the interface between existing and planned infrastructure and other activities to ensure:
 - (a) infrastructure and other activities are as compatible as practicable;
 - (b) the safe, efficient and effective operation, maintenance and minor upgrades, and major upgrades of existing or planned infrastructure are not compromised by the adverse effects of other activities; and
 - (c) infrastructure activities that are compatible with each other are co-located, while recognising that some types of infrastructure are not compatible.

- (2) Decision-makers on planning instruments must:
 - (a) engage with infrastructure providers to:
 - (i) understand their existing and planned infrastructure activities and medium to long-term plans;
 - (ii) identify appropriate buffers and other methods to protect existing and planned infrastructure from the adverse effects of new or intensified sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety;

 - (iii) support the strategic integration of infrastructure with land use activities;
 - (b) identify:
 - (i) activities that are particularly sensitive to the effects of infrastructure;
 - (ii) activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures;
 - (iii) infrastructure activities that are sensitive to the effects of other infrastructure;
 - (c) apply a range of methods, including, where appropriate:
 - (i) the use of buffers in plans to manage sensitive activities, including new or intensified sensitive activities, and incompatible activities near infrastructure;
 - (ii) design standards to manage the effects of infrastructure on other activities;
 - (iii) special purpose zoning and other spatial-planning layers; and
 - (d) ensure that measures to avoid, remedy or mitigate the effects of other activities on infrastructure are consistent with relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies.

Appendix 2: Horizons One Plan – Regional Policy Statement

UFD-O3: Urban form and function

The intensification and expansion of *urban environments**:

1. contributes to *well-functioning urban environments** that:
 - a. enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future,
 - b. increase the capacity and choice available within housing and *business land**,
 - c. achieve a quality, sustainable and compact urban form,
 - d. are, or planned to be, well connected by a choice of transport modes including *public transport**,
 - e. manage adverse *effects** on the environment, and
 - f. manage adverse *effects** (including reverse sensitivity *effects**) to ensure that the operation, maintenance and upgrade of *nationally significant infrastructure**, and physical resources of regional or national importance are not compromised.
2. enable more people to live in, and more businesses and *community services** to be located in, areas of an *urban environment** where:
 - a. it is in or near a *centre zone** or other area with many employment opportunities,
 - b. it is able to be, or is, well-serviced by existing or planned *public transport** and *active transport**,
 - c. there is a high demand for housing or *business land**, relative to other areas within that *urban environment**.

UFD-P4: Urban intensification and expansion

1. Intensification and expansion of *urban environments** is provided for and enabled in *district plans** where:
 - a. it contributes to a *well-functioning urban environment**,
 - b. it contributes to a range of residential and business areas that enable different housing and/or business types, *site** size and densities,
 - c. higher density development is in close proximity to *centre zones**, *public transport**, *community services**, employment opportunities, and open space,
 - d. development is well serviced by existing or planned *development infrastructure** and enables provision of *public transport**, and *additional infrastructure** required to service the *development capacity** is likely to be achieved,
 - e. it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character,
 - f. the operation, maintenance and upgrade of *nationally significant infrastructure** and physical resources of regional and national importance are not compromised, and
 - g. it promotes positive *effects**, and gives appropriate priority to the health and wellbeing of *waterbodies**, *freshwater** ecosystems, and other *receiving environments** where they are potentially adversely affected by urban development, while at a minimum avoiding, remedying or mitigating those *effects** (including cumulative *effects**).
2. In addition to meeting the criteria in (1) above, the expansion of *urban environments** must only occur where it:

