

Proposed Plan Change 3 - Urban Growth

Submitted by: Anonymous user

Submitted time: 13 Apr 2026, 16:52:59

Full name:

Dean and Teresa Cunningham

Organisation (if on behalf of an organisation):

DF & TA CUNNINGHAM

Postal address for service:

Telephone/mobile number:

Email address for service:

themusselman@hotmail.com

I could gain an advantage in trade competition through this submission.

No

I am directly affected by an effect of the subject matter of the submission that -

No

The specific provisions of the proposed plan change that my submission relates to are:

- * **The re-zoning of our land**
- * **The Main Vehicle Access points on the plan**
- * **The Public Open Spaces on the plan - involves our garden**
- * **The lack of sewerage services and capacity/power services**
- * **The Proposed increase in the valuation of our property and the flow on effect of the cost of rates associated with our property**
- * **The reference to and process/application of a rates remission**

My/our submission is that:

We don't support the re-zoning in its current form for the following reasons:

- 1. The proposed access on/through our land will involve the relocation of up to 8 power poles.**
- 2. The proposed public open space incorporates our house and garden**
- 3. The cost of power and sewerage connection will prohibit us from undertaking any residential subdivision development. We simply do not have the financial means.**
- 4. Upon re-zoning, our land will increase in value and therefore our rates. We have no indication of what this looks like.**
- 5. A rates increase will affect our day to day cost of living. It will also affect our re-sale opportunity.**

I/we seek the following decision from Rangitikei District Council:

We seek a chance to discuss with council the following:

We are not residential property developers.

We do not want to incur an unrealistic increase in our rates if the re-zoning is successful.

We understand the rates remission (if successful in obtaining) does not pass on to the next owner/land purchaser which will significantly impact on re-sale.

We also understand that there is no main sewer to our boundary and lack of power capacity to our boundary.

We need a more clearer picture of the likely financial impact/s to us going forward before we consider reviewing our position.

We are not opposed to development.

If we were to develop our land, it would be to provide quality lifestyle sections in line with the most recent development we made. However, access and cost of power connection are the prohibiting factors at this stage because we would want to develop the rear of our property.

I wish to be heard in support of my submission:

Yes

If others make a similar submission, I will consider presenting a joint case with them at a hearing:

Yes

If you would like to speak to your submission at a Hearing, would you like to make your verbal submission in Te Reo Māori?

No

How many attachments have been included?

0

RANGITĪKEI DISTRICT COUNCIL

Proposed Plan Change 3 - Urban Growth

Submission Form

Rangitikei District Plan (2013)

Resource Management Act 1991 – FORM 5 of the Resource Management (Forms, Fees and Procedure) Regulations 2003

Submissions can be:

Delivered to: Rangitikei District Council's head office: 46 High Street, Marton**Posted to:** Rangitikei District Council, Attn: Strategy Manager, Private Bag 1102, Marton 4741**Emailed to:** districtplan@rangitikei.govt.nz**Submissions must be received no later than 5pm on Monday, 13 April 2026.***Note: You must fill in all sections of this form.*

Submitter Contact Details	
Full name:	ROBERT PHILIP BERESFORD & SHIRLEY PHILLIPA SMITH
Organisation (if on behalf of an organisation):	MANGAPAPA TRUST No 2
Postal address for service:	
Telephone/mobile number:	
Email address for service:	rpandspsmith@gmail.com

Trade Competition	Select one:
I could gain an advantage in trade competition through this submission.	☐ Yes ☐ No
I am directly affected by an effect of the subject matter of the submission that - a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition. <i>Please note that if you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 of Schedule 1 of the Resource Management Act 1991.</i>	☐ Yes ☐ No

The specific provisions of the proposed plan change that my submission relates to are:

(Please specify/list the objective, policy, rule or zoning matter your submission relates to)

P.P.C. 3 - AS ATTACHED

My/our submission is that:

(Clearly state whether you **SUPPORT** or **OPPOSE** specific provisions of the proposed plan change
AND give reasons for your views)



AS ATTACHED

I/we seek the following decision from Rangitikei District Council:

(Give details and reasons why e.g. if you are seeking amendments outline these clearly)



AS ATTACHED

Proposed Plan Change Hearing	Select one:
I wish to be heard in support of my submission.	☐ Yes ☒ No
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	☒ Yes ☐ No
If you would like to speak to your submission at a Hearing, would you like to make your verbal submission in Te Reo Māori?	☐ Yes ☒ No

I have attached ONE additional pages to this submission.



Signature of submitter: RPMH 2026 Date: 12/4/2026
(or person authorised to sign on behalf of submitter)

In signing this document, I confirm that I have read the Privacy Statement below.

PLEASE READ:**IMPORTANT Privacy Statement – Privacy Act 2020:**

Submissions are public information. The information on this form including your name, address for service and submission will be accessible to the public as part of the decision making process. Council is required to have this by the Resource Management Act 1991. The information will be held by Rangitikei District Council and may be shared with other individuals and Agencies for the purposes of the plan change process. By signing and submitting this form, you confirm that you agree with this Privacy Statement. You have rights to access the information and request its correction.

Please include more pages if required.

Submitter details: Mangapapa Trust No.2

C/- Robert Phillip Beresford Smith &

Shirley Phillipa Smith

Interest: The affected 39 hectares of rural land to our north bounding our property.

We oppose Plan Change 3 in it's current form for the following reasons:

1. We do not believe the need exists and won't for decades, if ever.
2. We feel that the Rangitikei District Council needs to upgrade it's current infrastructure and services before opening up any further greenfield sites. The current facilities are far from adequate to accommodate what is already in place.
3. The quality of the proposed land to be taken out of production and turned into 400 sq m sites with 1.8m high fences does not fit at all with a very rural town philosophy of space and tranquility. We are very much opposed to such development.

Summary:

We would like to see consideration given to this rezoning deferred for at least 10 years .

We would then be advocating a staged rezoning approach to Rural Lifestyle zone with little or no fencing and soft, clever planting for privacy .

Signed:  

RANGITĪKEI DISTRICT COUNCIL

Proposed Plan Change 3 - Urban Growth

BY: 

Submission Form

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Submitter Contact Details	
Full name:	Margaret E Webster
Organisation (if on behalf of an organisation):	
Postal address for service:	
Telephone/mobile number:	
Email address for service:	te-annui@xtra.co.nz

Trade Competition	Select one:
I could gain an advantage in trade competition through this submission.	☐ Yes ☒ No
I am directly affected by an effect of the subject matter of the submission that - a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition. <i>Please note that if you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 of Schedule 1 of the Resource Management Act 1991.</i>	☐ Yes ☒ No

The specific provisions of the proposed plan change that my submission relates to are: (Please specify/list the objective, policy, rule or zoning matter your submission relates to)
I opposing removal of. GRZ-17

My/our submission is that:

(Clearly state whether you SUPPORT or OPPOSE specific provisions of the proposed plan change AND give reasons for your views)



oppose removal of GRZ-17
If it is removed I believe it has potential to negatively affect my quality of life increased eg. noise and decreased daylight & views and privacy

I/we seek the following decision from Rangitikei District Council:

(Give details and reasons why e.g. if you are seeking amendments outline these clearly)



same as above.

Proposed Plan Change Hearing	Select one:
I wish to be heard in support of my submission.	☐ Yes ☒ No
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	☒ Yes ☐ No
If you would like to speak to your submission at a Hearing, would you like to make your verbal submission in Te Reo Māori?	☐ Yes ☒ No

I have attached _____ additional pages to this submission.



Signature of submitter: Nik Webster

Date: 13-04-2026

(or person authorised to sign on behalf of submitter)

In signing this document, I confirm that I have read the Privacy Statement below.

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Please include more pages if required.

RANGITĪKEI DISTRICT COUNCIL

Proposed Plan Change 3 - Urban Growth

Submission Form

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Submitter Contact Details	
Full name:	Joanna Lee Edmonds.
Organisation (if on behalf of an organisation):	
Postal address for service:	
Telephone/mobile number:	
Email address for service:	

Trade Competition	Select one:
I could gain an advantage in trade competition through this submission.	☐ Yes ☐ No
I am directly affected by an effect of the subject matter of the submission that - a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition. <i>Please note that if you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 of Schedule 1 of the Resource Management Act 1991.</i>	☐ Yes ☐ No

The specific provisions of the proposed plan change that my submission relates to are: (Please specify/list the objective, policy, rule or zoning matter your submission relates to)
Oppose removing or rewriting clause GRZ-11. As that Clause protects fundamental rights for property owners.

My/our submission is that:

(Clearly state whether you SUPPORT or OPPOSE specific provisions of the proposed plan change AND give reasons for your views)



Oppose removing or rewriting Clause
ARZ-11. As that Clause protects
fundamental rights of property
owners.

I/we seek the following decision from Rangitikei District Council:

(Give details and reasons why e.g. if you are seeking amendments outline these clearly)



New Property developments need thorough
consultations with the public - not just
"in house" deals done thru RDC & developers

Proposed Plan Change Hearing	Select one:
I wish to be heard in support of my submission.	☐ Yes ☐ No
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	☒ Yes ☐ No
If you would like to speak to your submission at a Hearing, would you like to make your verbal submission in Te Reo Māori?	☐ Yes ☐ No

I have attached _____ additional pages to this submission.

Signature of submitter: _____

Date: _____

(or person authorised to sign on behalf of submitter)

In signing this document, I confirm that I have read the Privacy Statement below.

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Please include more pages if required.

13 April 2026

HRCID-378445411-143182025

AW:CM

Strategy Manager
Rangitikei District Council
Private Bag 1102
Marton 4742

districtplan@rangitikei.govt.nz

Kia ora,

SUBMISSION: PROPOSED PLAN CHANGE 3 – URBAN GROWTH

Thank you for the opportunity to provide feedback on Proposed Plan Change 3: Urban Growth.

Horizons Regional Council (**Horizons**) is responsible for managing natural resources across our region, which includes flood control, air and water quality monitoring, pest control, facilitating economic growth, leading regional land transport planning and coordinating the region's response to natural disasters.

Environmental planning is a key function. Horizons' integrated planning document, the One Plan, sets out four keystone environmental issues for the region – surface water quality degradation, increasing water demand, unsustainable hill country land use, and threatened indigenous biodiversity.

Horizons has no trade competition advantage in this submission. Our interest in the proposed plan change is primarily from our role as the regional authority for the area that is subject to the plan change. The submission reviews the proposed district plan change in regard to its alignment with the Regional Policy Statement component of the One Plan and to ensure that the proposed change gives effect to the Regional Policy Statement.

General Comment

Horizons generally supports Proposed Plan Change 3 (**PPC 3**). In particular, we consider it gives effect to section 31(1)(aa) of the Resource Management Act 1991, which requires territorial authorities to ensure that there is sufficient development capacity in respect of housing and business land. The plan change is also broadly consistent with the Objective 1 of Regional Policy Statement's Urban Form and Development chapter.

Horizons acknowledges and appreciates Rangitikei District Council's (**Council**) voluntary approach to giving effect to the National Policy Statement on Urban Development (**NPS-UD**), even though the district does not contain urban areas meet the criteria outlined under the NPS-UD. This reflects a positive and enabling approach to urban growth planning.

However, while Horizons is generally supportive of the proposed direction of PPC 3, we have identified a number of matters where further refinement and/or supporting evidence is required to ensure the District Plan gives effect to higher order documents, including the National Policy

Statement for Highly Productive Land (NPS-HPL), the National Policy Statement for Freshwater Management (NPS-FM), and the Regional Policy Statement (RPS).

Accordingly, Horizons supports PPC 3 in part, subject to the relief sought below.

Submission Points

1. NPS-HPL

The section 32 report for PPC 3 appropriately recognises that the greenfield rezoning of the plan change is subject to clause 3.6(5) of the NPS-HPL, which requires local authorities to ensure that the spatial extent of any urban rezoning over highly productive land is minimum necessary to provide the required development capacity.

The section 32 report includes a high-level discussion of population growth and anticipated housing demand, which provides some context for the need to enable additional residential development capacity in Bulls and Marton.

However, the section 32 report does not provide sufficient evidence to demonstrate compliance with clause 3.6(5), as it does not:

- a) quantify existing housing capacity, including plan-enabled capacity under the operative district plan, and feasible or commercially viable capacity,
- b) assess the contribution of proposed intensification to meeting development capacity needs, and
- c) quantify the development capacity enabled through rezoning of HPL, including the total yield anticipated from the proposed rezoning.

We acknowledge that the *RDC 3 Waters Growth Strategy* includes indicative assumptions for infill and greenfield development. However, it is unclear whether those projections incorporate the additional development capacity enabled through the proposed intensification provisions.

In the absence of this analysis, the section 32 report does not demonstrate the required development capacity, the proportion absorbed by the intensification, and the minimum extent necessary to rezone HPL to meet that requirement.

Accordingly, there is insufficient evidence to conclude that the proposed urban zoning of HPL(interim) is consistent with the requirements of clause 3.6(5) of the NPS-HPL.

Relief sought

Horizons requests that the Council provide evidence

and supporting technical documentation to demonstrate compliance with clause 3.6(5) of the NPS-HPL.

This may include:

- a) quantification of:
 - existing plan-enabled and feasible residential capacity,
 - additional capacity achievable through intensification, and

- capacity enabled by the proposed rezoning of HPL.
- b) an assessment of development capacity scenarios to demonstrate that:
 - the rezoning of HPL is necessary, and
 - the spatial extent proposed is the minimum required to meet the required capacity.

2. Flood Hazard

While the Natural Hazard chapter of the District Plan addresses the flood related risks within the district¹ including matters such as minimum floor levels, the proposed provisions do not clearly give effect to the RPS HAZ-NH P10 (4)(b).

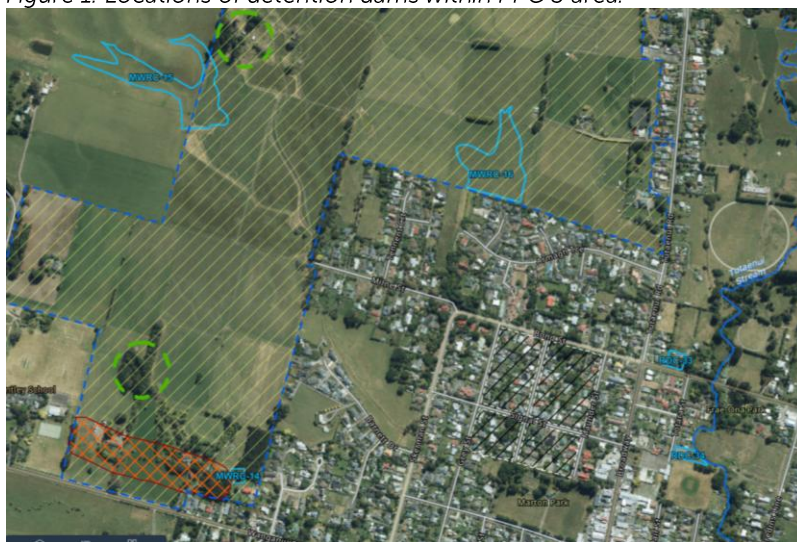
RPS HAZ-NH Policy 10(4)(b) requires that, during a 0.5% AEP flood event, safe evacuation can be achieved by ensuring that inundation of access routes between occupied structures and safe areas does not exceed specified depths and velocity thresholds (or an equivalent level of risk).

The PPC 3 provisions do not include any explicit requirement to maintain safe access routes during flood events, or access flood depth and velocity effects on evacuation pathways.

In addition, a proportion of proposed intensification overlay overlaps with the modelled inundated extent associated with a potential failure of Marton B Dam (classified as a Dangerous Dam).

Further, the proposed growth area on the western side of Marton (MAR01 and MAR07) has the potential to affect the operation and performance of existing flood management infrastructure, including detention dams and associated drainage systems (Figure 1). These assets are critical to maintaining the current level of flood protection for the Marton urban area.

Figure 1: Locations of detention dams within PPC 3 area.



Relief sought

Horizons requests that the Council:

1. amend PPC 3 provisions to explicitly require that safe access and evacuation routes are maintained during flood events, to give effect to RPS HAZ-NH Policy 10 (4)(b).
2. amend the Intensification Overlay of PPC 3 to exclude areas that overlap with modelled inundated extent resulting from a potential failure of Marton B Dam.

¹ subject to the submission point 3, which raises issues with the RDC Three Waters Growth Strategy

3. Amend PPC 3 provisions to ensure that future development:
 - a. does not reduce the effectiveness or capacity of existing flood management infrastructure, including detention dams and associated systems,
 - b. does not increase or alter runoff characteristics in a manner that compromises plod protection, and
 - c. maintains safe and practical access for operation and maintenance of flood management assets.

3. RDC 3 Waters Growth Strategy

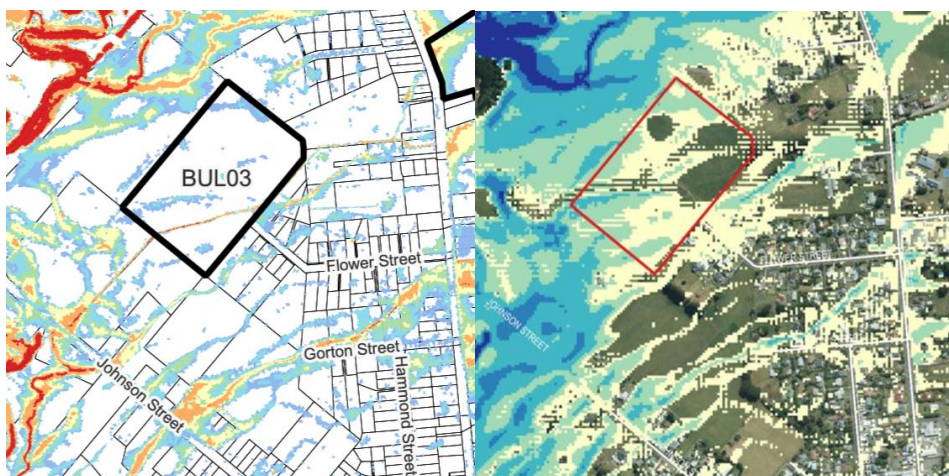
The RDC 3 Waters Growth Strategy (**GHD report**) report summarises three waters infrastructure required to accommodate future development and includes consideration of flood hazards within the PPC 3 area. The assessment (covering both greenfield and infill development) primarily relies on flood depths and flood volumes derived from an existing model, with mitigation proposed through attenuation of additional post-development runoff. While this mitigation approach is generally consistent with industry practice, it does not provide sufficient information demonstrate alignment with the National Policy Statement for Natural Hazard (NPS-NH) and the One Plan in relation to managing existing flood hazard and risk.

The report references the use of an “existing model”; however, it is difficult to know the details of the existing model.

The report also notes that the model was not complete at the time of report writing (Section 2.4.1, p8). It is unclear how the finalised model was incorporated into the assessment, and how this will inform the assessment. Furthermore, it is not clear whether the stated assumptions and limitations relate to the incomplete model or to the existing model used for the current assessment.

The *BUL03 Growth Area Flood Risk* memo by E2 Environmental Consulting Civil Engineers (E2) includes the 0.5% AEP depth map as shown in Figure 2. As the GHD report does not specify the design event, direct comparison of flood maps is difficult. If it is assumed that GHD has used a 1% AEP (with climate change) or a 0.5% AEP event, a high-level comparison may be possible; however, uncertainty remains. If this assumption is correct, the model outputs appear to differ significantly as shown in Figure 2.

Figure 2: Model result at Bulls (BUL03)– GHD’s map (Left), E2’s map (Right)



The Tutaenui Scheme provides flood protection and channel maintenance, including detention dams, drainage networks, and stopbanks as part of scheme operation. Future development must avoid increasing flood or erosion risks, not adversely affect the performance of drainage infrastructure, and must maintain access for Horizons' ongoing maintenance activities. These matters should be addressed in the GHD assessment.

Relief sought

Horizons requests that the Council:

1. clarify the flood modelling approach used in the Three Waters Growth Strategy, including model assumptions, limitations, and design event(s).
2. update flood hazard and risk assessments once modelling is complete, and reflect any material changes in plan provisions and spatial layers.
3. ensure alignment with Horizons' flood modelling, or clearly justify any differences.
4. amend PPC 3 provisions to require the future development:
 - a. Does not increase flood or erosion risk,
 - b. Does not compromise flood control and drainage infrastructure, and
 - c. Maintains access for operation and maintenance of the Tutaenui Scheme

4. Stormwater Management

RPS HAZ-NH Policies 12 and 13 require territorial authorities to manage stormwater to avoid or mitigate adverse effects, including increased runoff and flood risk from urban development.

In addition, the NPS-FM Policy 3 requires that *"Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments"*. This policy direction requires councils to ensure that urban development appropriately manages the effects of stormwater discharges including contaminant loads and cumulative effects on receiving environments at a catchment scale.

The GHD report (page 8) states that its stormwater assessment is based on the Council's intention to require greenfield development to be hydrologically neutral. However, this approach is not reflected in the PPC 3 provisions.

We observed the followings:

1. The PPC 3 provisions do not include any explicit requirement for greenfield development areas to achieve hydrological neutrality.
2. *GRZ-S4: Maximum Site Coverage* does not address the site permeability or ensure that post-development runoff is managed to pre-development levels.
3. The Marton North-West Structure Plan does not include stormwater management elements.

In the absence of appropriate provisions, development enabled by PPC 3 may increase stormwater runoff and peak flows, exacerbate downstream flooding and place additional pressure on infrastructure. This may result in a failure to give effect to RPS HAZ-NH Policies 12 and 13.

Relief sought

Horizons requests that the Council:

1. amend the PPC 3 provisions to require hydrological neutrality (or equivalent stormwater management outcomes) for greenfield development.
2. amend the District Plan provisions to require management stormwater quality across PPC 3 area, giving effect to the NPS-FM Policy 3.
3. clearly demonstrate how stormwater will be managed to achieve the intended outcome, and the consistency with NPS-FM Policy 3 and RPS HAZ-NH Policy 12 and 13.

4. Ecological Constraints

We generally agree with the findings of the *Ecological Constraint Study by Boffa Miskell*. However, we observe that the PPC 3 provisions have not adequately address the recommendations of the Ecological Constraint Study. The Boffa Miskell's recommendations were as follows:

- a. *"We recommend retaining a setback standard similar to GRUZ-S8 to ensure that there is an appropriate setback from the waterways to prevent degradation."*
- b. *"We recommend maintaining features within the landscape that provide habitat or act as ecological corridors that may be used by bats, birds or lizards."*
- c. Relief sought

Horizons request that the Council:

1. amend the proposed provisions introducing setback standard to protect waterways.
2. amend the proposed provisions introducing necessary tools to assure future development will maintain features within the landscape that provide habitat or act as ecological corridors that may be used by bats, birds or lizards.
3. amend the proposed provisions for General Residential Zone (GRZ) to make sure the future development will incorporate water sensitive stormwater design elements.

5. RLZ – Rural Lifestyle Zone Provisions

Horizons **supports** RLZ-O2, RLZ-O4, and proposed amendment to RLZ-P1 subject to the relief sought under the submission point 2. Flood Hazard, as they give effect to RPS UFD Policy 1(2), RPS HAZ-NH Policy 12, and RPS HAZ-NH Policy 13.

Relief sought

Horizons requests that the Council retain RLZ-O2, RLZ-O4, and proposed amendment to RLZ-P1 (subject to the relief sought under the submission point 2) as notified.

6. RLZ – Rural Lifestyle Zone Provisions

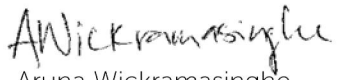
Horizons **supports** GRZ-O2 and GRZ-P7 as they give effect to RPS UFD Policy 1(2).

Relief sought

Horizons requests that the Council retain GRZ-O2 and GRZ-P7 as notified.

Subject to the relief sought above, Horizons supports PPC 3 in part and considers that, with those amendments, the plan change would be appropriate and gives effect to the relevant higher order documents. Horizons wishes to be heard in support of this submission.

Ngā mihi



Aruna Wickramasinghe
SENIOR POLICY PLANNER

Address for service:

Aruna Wickramasinghe
Policy and Strategy Team
Horizons Regional Council
Private Bag 11025
Manawatu Mail Centre
PALMERSTON NORTH 4412
Email: Aruna.Wickramasinghe@horizons.govt.nz

Kia Ora Kautou Katoa,

My name is Adam Dekker, managing director of KPA Properties.

KPA Properties is a locally owned and operated company which primarily develops land and manages the building of affordable new homes. We own a number of properties around the region, including 3 parcels of land in Bulls of varying zonings and in varying stages of the property development process.

We have been procuring parcels of land in and around the Manawatu for over 22 years. This includes a very successful 32 lot subdivision completed in Feilding in 2019 of a very similar nature to what we intend to undertake in Bulls.

We have discussed with Craig Pocock the future of Bulls and the collaboration of KPA Properties and Rangitikei District Council in support of the growth of the Bulls community. This was a refreshing and productive conversation, where Craig provided great insights for us to consider when making further decisions around our plans for development in Bulls. We hope to have also provided Craig with information in support of his research from a developer's point of view.

Proposed Plan Change 3 – Urban Growth

KPA is in support of RDC submission in regard to our parcel of land being recognized for future residential potential.

KPA Properties is the landowner of identified growth area BUL03 at the end of Flower Street in Bulls.

KPA Properties is also the landowner of adjoining residential land to the South (between Flower Street and Johnson Street), as well as to the North-East (off Bridge Street).

We purchased these 3 parcels of land in 2020 and 2021 with intentions to develop it, as we saw great potential in Bulls as a desirable central lower North Island location that we could forecast growth occurring in.

We currently hold a Resource Consent for 88 new residential greenfield lots within our Johnson Street to Flower Street development.

It was exciting to hear about part of our rural property being in the proposed plan change as our intention was always to propose this to council to allow us to develop it into residential sections in the future.

In preparation for this meeting, we have put together a conceptual scheme plan which displays how we would intend to utilise this land should the land be rezoned. You will notice that our adjoining Bridge Street property is otherwise landlocked for residential sections should this secondary area not be rezoned.

This means that by rezoning BUL03 to residential, we could not only unlock this area, but also develop the additional residentially zoned site in Bridge Street (creating upwards of 42 sections in total). This subdivision (which we reference as stage 2) will also be hugely complimented by our neighbouring subdivision (stage 1 - between Johnson and Flower).

Alternatively, the already residentially zoned 2.3 hectare Bridge Street property is unlikely to be developable due to its access off State Highway 3 being unsafe for this number of properties. We believe this would be a disappointing outcome for Rangitikei District Council and would go against the growth plan for the Bulls community.

I would like to add that our Bridge Street property is very visible from the State Highway 3 entrance into Bulls which we believe alongside George Street will continue to increase the beatification of this once-underwhelming entrance into Bulls.

We would like to acknowledge that while part of the BUL03 parcel is identified as a potential flood zone area under the 1 in 200-year flood maps; when the Tutaenui Stream flooded in June 2023 I personally walked the entire site to investigate the effects of this flooding on our land. I found the site to be unaffected by the flooding, regardless of its proximity to the stream. I have video evidence of this day that can be provided on request. It is my professional opinion that any potential hazard in this regard can be mitigated through civil construction works and landscaping. We have also spoken with the Tricker family who have been farming this land since World War I and they have stated that flooding is not an issue on the proposed BUL03 site.

KPA Properties are also landowners of the secondary rural title adjoining BUL03 which has not been identified under this plan change. I would like to mention that we are open to the incorporation of this area into any potential new subdivision for the purpose of mitigating stormwater issues or in any other way that this area may be able to support the development of our surrounding land and the wider community of Bulls. Infact, we are already in discussions with Rangitikei District Council and the developer of George Street and will likely be assisting to mitigate the stormwater issues related to the George Street subdivision as part of our design.

In direct response to Craig Pocock's 'Recreation and Open Space Network Survey and Analysis for Bulls', it is important to note that KPA Properties and its directors are favourable of ideas to integrate small commercial blocks and public spaces amongst our subdivisions. This includes Haylock Park which neighbours our Resource Consented development, as well as the potential for some of our rural block which is currently less suitable for building residential homes.

We believe that something like this could hugely benefit the community and further compliment the abundance of new homes that we plan to build in this area, making a more desirable and practical location for residents.

Summary

Myself and the other directors of KPA Properties also own well-known construction company, Humphries Construction, as well as architectural, prefabricated sheds, pre-cast panel companies and a variety of commercial and development properties around the region. As a collective we supply work for thousands of people throughout our wider region, which by undertaking these developments in Bulls would also involve further work opportunities for residents of Bulls and the wider district over this 5-10 year project.

In summary, KPA Properties is very much in support of the initiative and growth of BUL03 being rezoned to residential. We are impressed with Council's proactive ambition to identify areas for urban development in order to future-proof the community.

Should BUL03 be rezoned to residential, this means KPA Properties will have the capability to add upwards of 130 new homes to the Bulls community in total, increasing the number of houses in Bulls by almost 15%. These homes will be of a good standard, have all the benefits of new homes such as being Healthy Homes compliant, attractive and generally enhancing the quality of living in Bulls.

We have introduced a rural outlook to several of our proposed sections which we believe will be an attractive selling point to the large portion of rural residents in the community. Sections will also be available in a variety of sizes, allowing them to suit a wider range of people and needs.

We believe it makes sense from a growth perspective to rezone BUL03 to residential as we are developers, we're keen and ready to go, and our intentions are very much in alignment with those of Rangitikei District Council.

We have already completed a variety of feasibility studies on this area, including the viability of building homes on the land, and market assessments to ensure our objective is in accordance with what the Bulls market is in need of. We're looking forward to the potential of assisting Council in continuing these studies to allow for the rezoning of BUL03.

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New Zealand Defence Force
 Defence Estate and Infrastructure
 NZDF Headquarters
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Submission on Proposed Plan Change 3: Urban Growth Rangitikei District Plan

Clause 6 of First Schedule, Resource Management Act 1991

To: Rangitikei District Council
Address: By email: districtplan@rangitikei.govt.nz

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Submission

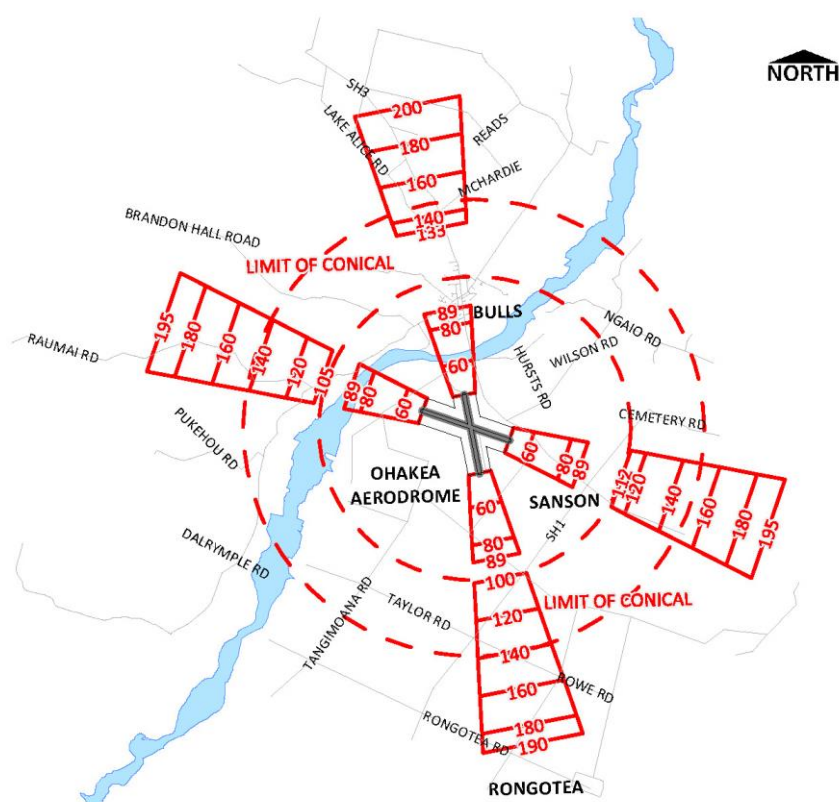
1. This submission on Proposed Plan Change 3: Urban Growth (PC3) relates to:
 - a. Residential intensification in the General Residential Zone in Bulls; and
 - b. The rezoning of land on the edge of Bulls to General Residential Zone.
2. The New Zealand Defence Force (NZDF) operates the Royal New Zealand 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.

5. 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

6. The Bulls Residential Intensification Area and new General Residential areas are within Designation MEDF-02 Height Restrictions RNZAF Base, Ōhakea. MDEF-02 sets height limits in the areas around RNZAF Base Ōhakea, as shown in the Ōhakea 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 Ōhakea Airfield.

These surfaces are shown on this diagram as:

1. A wedge shape inclined plane rising at a gradient of 1 in 50 from their origin at the end of the airfield
2. A transitional surface on either side of the climb surface sloped at a gradient of 1 in 7.
3. 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-served 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: