

RANGITĪKEI DISTRICT COUNCIL

Proposed Plan Change 3

Urban Growth
Section 32 evaluation

Date of report:
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make this place home

 **RANGITĪKEI**
DISTRICT COUNCIL

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1 Executive Summary

Rangitikei District Council applied for a plan stop exemption application under s80W of the Resource Management Act 1991. On 28 November 2025, the Minister Responsible for RMA Reform approved an exemption application for Proposed Plan Change 3 – Urban Growth to the Operative Rangitikei District Plan under s80W(2)(b) and s80W(2)(h) of the Resource Management Act 1991. This plan change is proceeding in accordance with the exemption application approval.

Proposed Plan Change 3 gives effect to Rangitikei District Council's "*Community Spatial Plan - Pae Tawhiti Rangitikei Beyond*" (2023) and responds directly to its efficiency and effectiveness monitoring of the Residential and Rural Lifestyle Zones.

This evidence identifies opportunities to increase the supply of residentially zoned land in key settlements to provide new housing and identifies provisions that potentially constrain intensification and efficient urban form. Proposed Plan Change 3 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.

The proposed plan change seeks to better enable and provide for urban growth throughout the Rangitikei District and amend provisions that are no longer fit for purpose, rezone additional land for residential purposes within Marton and Bulls and provide opportunities for more intensive residential development within the district's main urban centres - Marton, Bulls and Taihape.

This Section 32 report evaluates proposed changes to the Operative Rangitikei District Plan for Proposed Plan Change 3 – Urban Growth.

The key resource management issues for urban growth are:

- **Issue 1:** *Lack of adequate land to meet the needs for short, medium and long term growth.*
- **Issue 2:** *Unplanned growth can result in ad hoc urban expansion and loss of rural land for productive purposes.*

The scope of the plan change is:

- Amendments to 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.
- Amendments to 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.
- Amendments to 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.
- 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.

An evaluation of proposed provisions in this plan change has found that they are the most appropriate way to achieve the objectives in the Operative Rangitikei District Plan and this plan change rather than the existing provisions and any alternative options available and will enable Rangitikei District Council to better meet its statutory obligations.

2 Introduction

On 28 November 2025 the Minister Responsible for RMA Reform ('the Minister') approved a plan stop exemption application for Proposed Plan Change 3 – Urban Growth ('PPC3') to the Operative Rangitikei District Plan ('the Plan' or 'ODP'). This plan change is proceeding in accordance with the exemption application approval.

Rangitikei District Council ('the Council' or 'RDC') has prepared proposed PPC3 to the ODP for notification under the provisions of the Resource Management Act 1991 ('RMA').

This report outlines the purpose, scope, statutory context, proposed amendments relating to PPC3, and provides an evaluation of the proposed amendments in accordance with the requirements of section 32 of the RMA.

2.1 Summary of proposed changes

2.1.1 District Wide Chapters

Amend the operative Subdivision Chapter (refer to **Appendix 1.1**):

- Reference the National Policy Statement for Highly Productive Land ('NPS-HPL') (amend SUB-I1).
- Insert new policies to provide for more intensive residential development, a structure plan, and infrastructure requirements (SUB-P5 to SUB-P8).
- Insert new policies to provide for rural lifestyle subdivision (SUB-P12).
- Amend SUB-R1 to provide for the structure plan.
- Amend SUB-S5 to provide for smaller minimum lot sizes in the Residential Intensification Area Overlay and Rural Lifestyle Zone for Marton and Bulls subject to natural hazards considerations.
- Insert SUB-S9 to provide for subdivision within a structure plan area.

Amend the operative General Residential Zone Chapter (refer to **Appendix 1.2**):

- Insert new issue statements to better describe the issues for the General Residential Zone relating to housing diversification, sustainable development and infrastructure, quality living environments and non-residential activities (GRZ-I1 to GRZ-I4).
- Amend GRZ-O1 and insert new objectives to respond to the above issues.
- Amend GRZ-P4 and GRZ-P5 and insert new policies (GRZ-P7 and GRZ-P8) to provide direction on nature, scale and form of housing and other development in the General Residential Zone.
- Delete GRZ-R14 relating to buildings and structures that do not comply with building setback from a road boundary (GRZ-R1 is proposed to apply instead).
- Amend performance standards GRZ-S1, GRZ-S2 and GRZ-S3 to provide greater clarity and flexibility for building height in relation to boundary, building setbacks and heights. Also amend GRZ-S4, GRZ-S5, and GRZ-S6 which are the requirements for building coverage, site area and outdoor living space to enable more intensive development.
- Insert new performance standards for fence heights and development within a structure plan area (GRZ-S8 and GRZ-S9).

2.1.2 Planning Maps - Structure Plan

Introduce a new Marton North-West Structure Plan Area (refer to **Appendix 2**), which identifies:

- The spatial extent of the area covered by the structure plan;
- The location of key roads, shared pathways and potential stormwater drainage areas; and
- Indicative transport (road and/or shared pathway) linkages.

2.1.3 Planning Maps - Residential Intensification Area

Introduce a new Residential Intensification Area overlay to the Rangitikei ePlan which enables smaller lot sizes in residential areas near the town centres of Marton, Bulls and Taihape – the nature and spatial extent of these proposed changes are set out in **Appendix 3**.

2.1.4 Planning Maps - Rezoning

Introduce zoning changes to a number of sites currently within the General Rural Zone and one site within the Rural Lifestyle Zone, to provide additional residentially zoned land on the urban edges of Marton and Bulls– the nature and spatial extent of these proposed changes are set out in **Appendix 4**.

3 Statutory and Policy Context

3.1 Resource Management Act 1991

3.1.1 Plan Stop

The Resource Management (Consenting and Other System Changes) Amendment Act 2025 brought in changes to pause councils work on the review and change of their RMA plans (referred to hereon as the 'plan stop'). The plan stop halted new and in-progress council plan changes or plan reviews and applies to all plan changes/reviews except for those automatically exempt or granted an exemption through an application to the Minister.

An exemption application for PPC3 was lodged by the Council with the Minister on 10 September 2025 and this application was granted on 28 November 2025. The decision noted that the plan change met the application exemption criteria in s80W(2)(b) and (h). This plan change is proceeding in accordance with the exemption application approval.

3.1.2 Matters to be considered

Sections 74 and 75 of the RMA set out legal obligations when changing a District Plan and requires the Council to prepare its change to the District Plan in accordance with its functions under section 31, its stated purpose in section 5 and the other matters set out in sections 6, 7 and 8. The relevant matters are considered in the following sections of this report.

Section 31 of the RMA states:

1. *Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:*
 - a. *The establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the effects of the use, development or protection of land and associated natural and physical resources.*
 - aa. *the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district:...*
 - f. *any other functions specified in this Act.*
2. *The methods used to carry out any of the functions under subsection (1) may include the control of subdivision.*

3.1.3 Part 2 of the RMA

An evaluation is required of how the proposal achieves the purpose and principles in Part 2 of the RMA. This requires consideration of sections 5 to 8 of the RMA.

Section 5 sets out the purpose of the RMA as follows:

- (1) *The purpose of this Act is to promote the **sustainable management** of natural and physical resources.*
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while -*
 - (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The plan change proposes provisions to better manage urban development these need to avoid, remedy or mitigate effects on the environment and sustain the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations.

In particular, providing additional opportunities for housing, both in new areas on the periphery of existing towns and enabling more intensive housing within existing residential areas meets the needs of current and future generations.

Section 6 of the RMA requires all persons exercising functions and powers under the RMA to '*recognise and provide*' for specified matters of national importance. The section 6 matters relevant to PPC3 are outlined in Table 1.

Table 1: Relevant section 6 matters

Relevant matter	Applicability to plan change
Section 6(a) <i>the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development</i>	Areas within Marton and Bulls have been identified as having potential 'natural inland wetlands' and also have named waterbodies or unnamed tributaries flowing through or bordering them. Therefore, appropriate measures must be taken to preserve, protect and enhance the natural functioning and ecosystems of these waterbodies.
Section 6(c) <i>the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna</i>	An Ecological Constraints Study (refer to Appendix 10) has confirmed that there is little or no indigenous vegetation or significant habitats located within the proposed urban growth areas.
Section 6(e) <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga</i>	There are no identified or known sites or areas of significance to Māori within the areas subject to PPC3.
Section 6(f) <i>the protection of historic heritage from inappropriate subdivision, use, and development</i>	There are identified archaeological sites within Bulls growth areas subject to PPC3, and there are also some identified archaeological sites within proximity of the Structure Plan area that have been noted (refer to Appendix 7 and Appendix 8). Provision is made in the ODP and mechanisms outside of the District Plan (e.g. archaeological authorities) to protect important historic heritage values.
Section 6(h) <i>the management of significant risks from natural hazards.</i>	Consideration of potential effects that may result from natural hazards has been given to the areas within PPC3. This includes avoiding rezoning land or introducing more intensive residential development opportunities on land that is subject to significant risks from natural hazards and incorporating requirements to manage the significant risks.

Section 7 of the RMA requires all persons exercising functions and powers under the RMA, in relation to managing the use, development, and protection of natural and physical resources, to 'have particular regard to' a range of matters. The section 7 matters relevant to this PPC3 are included in the Table 2.

Table 2: Relevant section 7 matters

Relevant matter	Applicability to plan change
Section 7(a) <i>kaitiakitanga</i>	The Council is committed to working with and supporting iwi and hapū to achieve shared aspirations for the future. Within the urban growth areas of PPC3 the framework will continue to enable guardianship and protection over the land and waterbodies situated within these areas. This is achieved through existing mechanisms and provisions outside of this plan change.
Section 7 (aa) <i>the ethic of stewardship</i>	By identifying key areas suitable for development within Marton and Bulls and providing clearer direction for development within the Rural Lifestyle Zone, the Council are protecting other urban fringe areas from unsuitable and/or ad-hoc development.
Section 7(b) <i>the efficient use and development of natural and physical resources</i>	The urban fringe rezoning of Marton and Bulls ensures development occurs in areas where Council anticipates urban growth, ensuring natural and physical resource are used and developed in a sustainable manner. A new structure plan area also seeks to achieve efficient land use patterns, urban form and transport networks further supporting the efficient use and development of natural and physical resources.
Section 7(c) <i>the maintenance and enhancement of amenity values</i>	Enabling additional infill development within the existing urban areas of Marton, Bulls and Taihape may affect the amenity values of the existing surrounding areas of a proposed site for development. Objectives, policies and rules seek to ensure amenity values are maintained and enhanced while enabling an appropriate level of development. Zoning specific areas for residential development ensures that land is able to be used for its anticipated purpose recognising amenity values will change as and when development occurs. Existing and proposed plan provisions seek to ensure the resultant amenity values are consistent with the outcomes anticipated for these areas.
Section 7(f) <i>maintenance and enhancement of the quality of the environment</i>	Enabling development within the urban fringes and a structure plan area ensures that it occurs in a sustainable manner and helps to reduce the demand and negative effects development has on other areas within the district, such as land that can be used for productive purposes.

Section 8 requires local authorities to ‘take into account’ the principles of Te Tiriti o Waitangi / Treaty of Waitangi. As part of the plan change preparation process, Council has been committed to working with and supporting iwi and hapū to achieve shared aspirations for the future through this process. The Council has proactively engaged with iwi and hapū through email, meetings and presentations, and this is discussed in more detail later in this report.

In particular, the archaeological scoping assessments (**Appendix 7** and **Appendix 8**) have identified the likelihood, nature, and sensitivity of archaeological and iwi cultural sites within the Urban Growth areas.

3.2 National Direction

Section 75(3) of the RMA requires that all District Plans give effect to any National Policy Statement ('NPS'), any New Zealand Coastal Policy Statement, any National Planning Standard, and any Regional Policy Statement.

In addition, under Section 74(1)(ea) and (f) of the RMA, the Council must prepare and change its District Plan in accordance with NPSs, the New Zealand Coastal Policy Statement, the National Planning Standards and any other regulations (such as the National Environmental Standards).

Under the plan stop legislation, the mandatory and discretionary directions regarding National Planning Standards have been paused (i.e. section 58JA of the RMA has paused the requirement to comply with the National Planning Standards).

For completeness, the following sections outline the parts of National Direction that are relevant to PPC3.

3.2.1 National Policy Statements

The National Policy Statements relevant to this proposed plan change are summarised in Table 3 below:

Table 3: Relevant National Policy Statements

National Policy Statement	Relevant Objectives/Policies
National Policy Statement on Urban Development 2020 ('NPS-UD')	<p>Rangitikei District does not meet the definition for “urban environment” and is therefore not considered to be a Tier 1, 2 or 3 local authority, however, the NPS-UD is still a useful guide and framework to support Council’s urban growth planning.</p> <p>PPC3 enables the rezoning of additional residential land and is intended to be an urban environment as defined in this policy statement. The changes proposed as part of PPC3 are consistent with the outcomes of the NPS-UD in that they seek to achieve a well-functioning urban environment and provide sufficient development capacity now and into the future. The following objectives and policies are relevant to PPC3:</p> <p><i>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</i></p> <p><i>Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.</i></p> <p><i>Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</i></p> <ul style="list-style-type: none"> <i>a) the area is in or near a centre zone or other area with many employment opportunities</i> <i>b) the area is well-served by existing or planned public transport</i> <i>c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</i> <p><i>Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</i></p>

Objective 6: Local authority decisions on urban development that affect urban environments are:

- a) integrated with infrastructure planning and funding decisions; and*
- b) strategic over the medium term and long term; and*
- c) responsive, particularly in relation to proposals that would supply significant development capacity.*

Objective 8: New Zealand's urban environments:

- a) support reductions in greenhouse gas emissions; and*
- b) are resilient to the current and future effects of climate change.*

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- a) have or enable a variety of homes that:

 - i. meet the needs, in terms of type, price, and location, of different households; and*
 - ii. enable Māori to express their cultural traditions and norms; and**
- b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;*
- d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- e) support reductions in greenhouse gas emissions; and*
- f) are resilient to the likely current and future effects of climate change.*

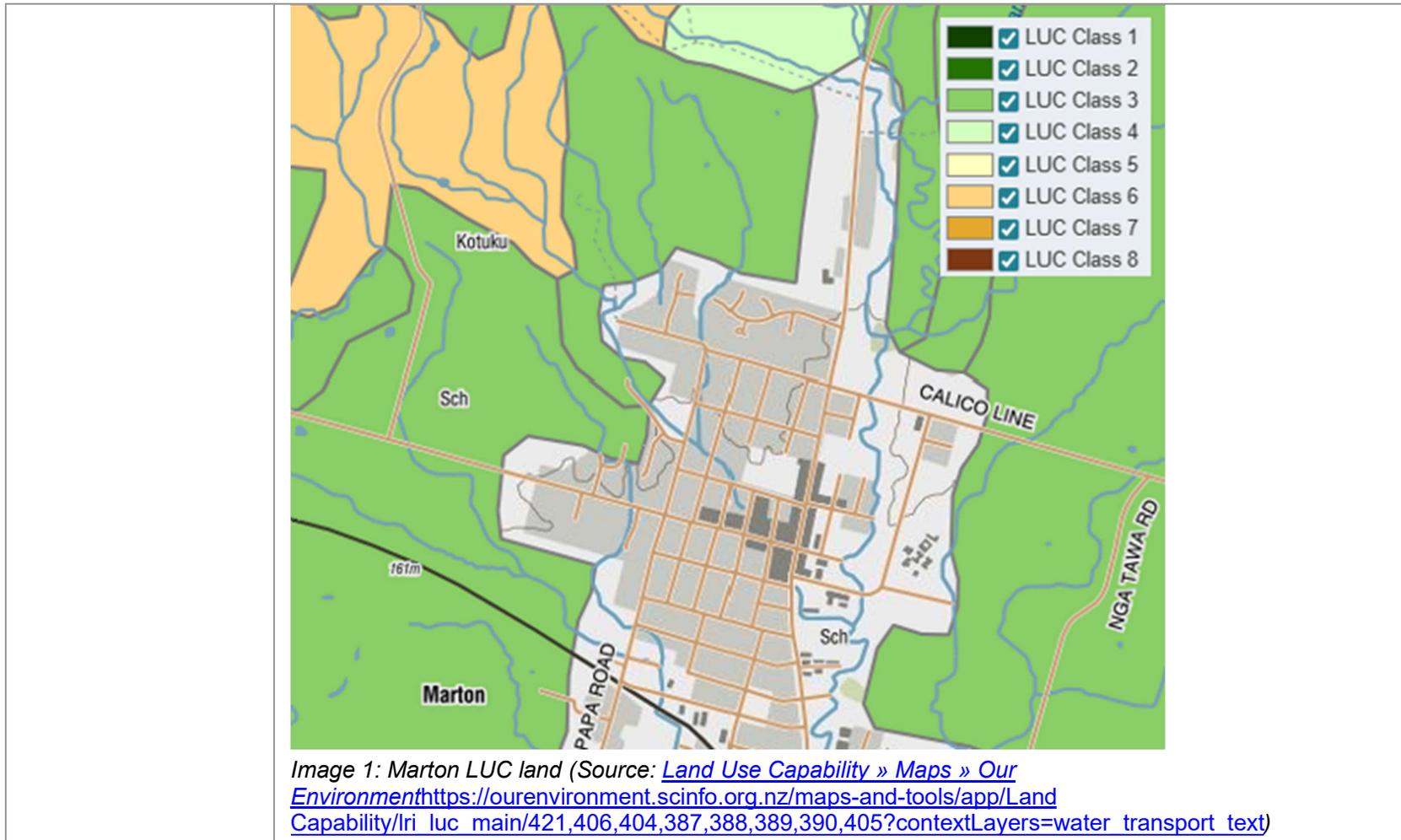
Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

 - i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and**

	<p><i>ii. are not, of themselves, an adverse effect</i></p> <p><i>c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</i></p> <p><i>d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</i></p> <p><i>e) the likely current and future effects of climate change.</i></p> <p><i>Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</i></p> <p><i>a) unanticipated by RMA planning documents; or</i></p> <p><i>b) out-of-sequence with planned land release.</i></p> <p><i>Policy 10: Tier 1, 2, and 3 local authorities: that share jurisdiction over urban environments work together when implementing this National Policy Statement; and engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and engage with the development sector to identify significant opportunities for urban development.</i></p>
<p>National Policy Statement for Highly Productive Land 2022 ('NPS-HPL')</p>	<p>The NPS-HPL is relevant as Rangitikei District features a high proportion of 'highly productive land' (being LUC Class 1, 2 and 3 land).</p> <p>The urban fringe areas around Marton and Bulls (including the Marton North-West Structure Plan Area) proposed to be rezoned are identified as LUC 3 land.</p> <p>It should be noted that the Rangitikei ePlan maps are currently outdated and identify some of this land incorrectly as LUC 2. However, Manaaki Whenua and Horizons Regional Council have the most up to date mapping of LUC land. The images below are taken from the Manaaki Whenua website and show the land use classification for the urban fringe of Marton and Bulls:</p>



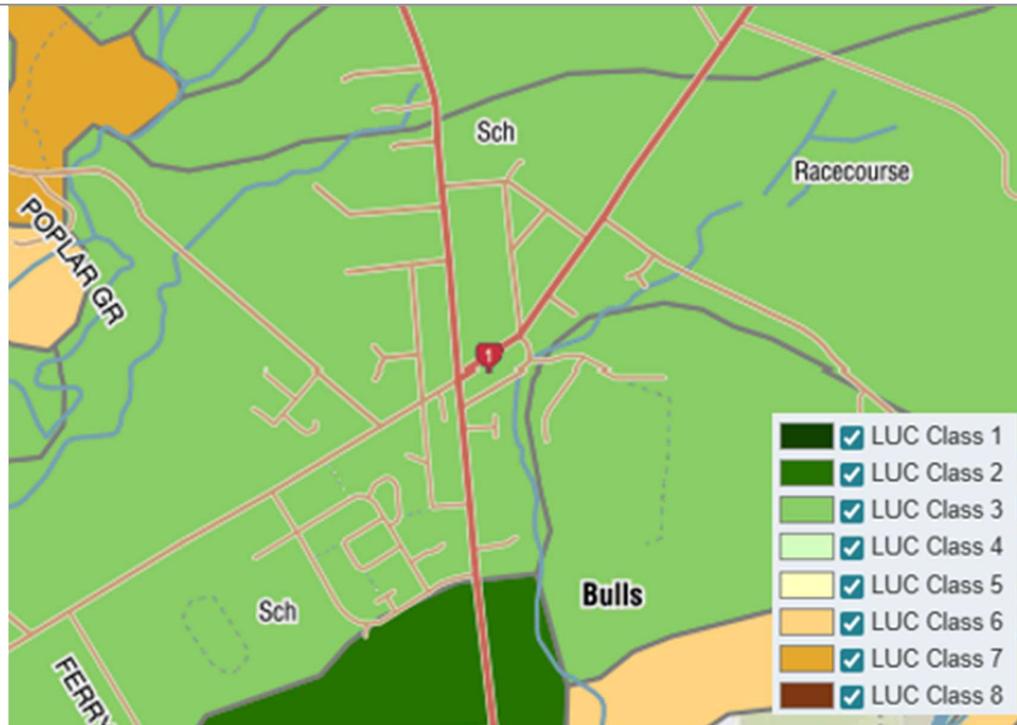


Image 2: Bulls LUC land (Source: [Land Use Capability » Maps » Our Environment](#))

In accordance with Clause 3.6(6) Restricting urban rezoning of highly productive land, Clauses 3.6(1), 3.6(2), 3.6(3) and 3.6(4) do not apply to urban rezoning of LUC 3 land.

PPC3 is therefore subject to 3.6(5) only, 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.

	<p>The NPS–HPL requires that territorial authorities ensure <i>the spatial extent of any urban zone covering highly productive land is the minimum necessary</i> to provide required development capacity while still achieving a well-functioning urban environment. PPC3 proposes to rezone land on the urban edges of Marton and Bulls to provide for short, medium and long-term residential growth projections.</p> <p>Through the preparation of the Community Spatial Plan <i>Pae Tawhiti Rangitikei Beyond</i>, the development capacity and projected demand was calculated. In addition, various spatial options and growth areas were identified and evaluated, including consideration of highly productive land. Through this process, the direction of the NPS-HPL was considered.</p> <p>Given the predominantly rural character of the district and the land surrounding Marton and Bulls largely being classified as LUC 3, any future urban expansion will inevitably involve the loss of some highly productive land. The extent of land proposed for rezoning under PPC3 has been determined through a comprehensive suite of technical assessments. These assessments have provided RDC with technical evidence to determine which urban growth sites are the most appropriate for providing for the growth projected and help minimise the area of LUC 3 land to be included for urban zoning.</p> <p>The proposed provisions also facilitate increased development opportunities within the existing Rural Lifestyle Zone. This is important to discourage ad hoc lifestyle development within the General Rural Zone.</p> <p>The plan change also proposes to provide additional development capacity within the existing urban environment through changes to provisions in the General Residential Zone and Subdivision Chapters of the ODP and the introduction of the Residential Intensification Area.</p> <p>Overall, this approach gives effect to the NPS–HPL by limiting the urban zoning of highly productive (LUC 3) land whilst still providing sufficient development capacity, and supporting a compact, efficient, and well-functioning urban form.</p>
<p>National Policy Statement for Natural Hazards 2025 (NPS-NH)</p>	<p>The NPS-NH is a new National Direction which sets out a balanced way for councils to manage natural hazard risks in new developments, based on the level of risk involved. Making new development safer helps to reduce future costs and make communities more resilient. The policy direction of the NPS-NH includes:</p> <ul style="list-style-type: none"> • Avoiding development in areas of very high natural hazard risk. • Avoiding or mitigating development in areas subject to significant risk (medium/high). • Using the best available information, even where uncertain. • Considering climate change impacts at least 100 years ahead. • Applying the prescribed risk matrix for hazard assessment.

The NPS-NH is relevant as development could occur within proximity to Natural Hazard Areas. Existing provisions in the ODP are in place for development occurring within a Natural Hazard Area (as identified on the planning maps).

Proposed Plan Change 3 gives effect to the NPS-NH by:

- Avoiding rezoning land for residential purposes in areas identified as subject to significant risks from natural hazards.
- A flood risk assessment (**Appendix 14**) has assessed BUL03 as having a low risk subject to mitigation and avoidance of parts of the growth area from development.
- Relying on existing plan provisions and proposed new provisions to manage the risks lower level natural hazards to ensure the risks are avoided or mitigated to an acceptable level.

3.2.2 National Environmental Standards

The National Environmental Standards ('NES') relevant to the plan change are summarised in Table 4 below:

Table 4: Relevant National Environmental Standards

NES	Relevant Objectives/Polices
National Environmental Standards for Detached Minor Residential Units 2025 (NES-DMRU)	<p>The NES-DMRU is a new NES and introduces new standards to simplify the process for building detached minor residential units commonly known as “granny flats” when certain requirements are met.</p> <p>An advice note is included at the beginning of the General Residential Zone chapter and the Rural Lifestyle Zone chapter to ensure users refer to the NES-DRMU when developing a detached minor residential unit. This ensures consistency with the NES-DRMU which may have more lenient rules than the underlying zone standards.</p>

3.2.3 National Planning Standards

Section 75(3)(ba) of the RMA requires the District Plan to give effect to any national planning standard.

The ePlan version of the ODP was made operative on 9 January 2025. The ePlan version of the ODP implements the mandatory requirements of the National Planning Standards for foundation, general provisions, district-wide matters, zone framework, format, noise and vibration metrics, structure, format, mapping, designations, definitions and spatial layers.

The ODP achieves alignment with the National Planning Standards as far as practicable. PPC3 implements the National Planning Standards consistent with the ePlan version of the ODP.

3.3 Regional Direction

Under Section 75(3)(c) of the RMA, a District Plan must give effect to any Regional Policy Statement which, in this instance, is the Horizons Regional Council's 'One Plan' (which comprises a combined Regional Policy Statement and Regional Plan).

3.3.1 Horizon Regional Council's One Plan

The One Plan sets objectives, policies, and rules for the natural resources of the Manawatū-Whanganui ('Horizons') Region. The One Plan identifies the “Big Four Issues” for the Region as surface water quality degradation, increasing water demand, unsustainable hill country land use, and threatened biological diversity.

Table 5 below identifies the relevant provisions and resource management topics for the proposed plan change contained in the One Plan.

Table 5: Regional Council's One Plan

One Plan	PPC3
<p><i>Issue UFD-I1 Strategic planning and land* use</i> <i>Urban development that is not strategically planned can result in the piecemeal and inefficient provision of associated infrastructure.</i></p> <p><i>Issue UFD-I2: Adverse effects* from urban growth and rural residential subdivision* on highly productive land*</i></p> <p><i>Objective UFD-O1 - Strategic planning and urban development – Strategic planning for urban development ensures that</i></p> <ol style="list-style-type: none"> <i>(1) sufficient development capacity* and land* supply for housing and business uses is provided to support growth,</i> <i>(2) new development, development infrastructure* and additional infrastructure* are provided in a coordinated, integrated and efficient manner,</i> <i>(3) the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and</i> <i>(4) competitive land* and development markets are supported in ways which improve housing affordability.</i> <p><i>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*.</i></p> <p><i>Objective UFD-O3: Urban form and function contribute to well-functioning urban environments</i></p> <p><i>Policy UFD-P1: Integration of infrastructure^ with land^ use</i></p> <p><i>Policy UFD-P2: Providing sufficient development capacity*</i></p> <p><i>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*.</i></p> <p><i>Policy UFD-P4: Urban intensification and expansion</i></p> <p><i>Policy UFD-P5: Built forms</i></p>	<p>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.</p> <p>It also promotes planned development and infrastructure in the Marton North-West Structure Plan Area rather than reacting to the pressures for piecemeal ad hoc development.</p>
<p><i>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</i></p>	<p>PPC3 gives effect to this One Plan objective and policy by avoiding</p>

One Plan	PPC3
<p><i>small proportion of the original extent of indigenous habitats remains.</i></p> <p><i>Objective ECO-O2: Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity[^], including enhancement where appropriate.</i></p> <p><i>Policy ECO-P2: 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[^]</i></p>	<p>development in areas of significant indigenous vegetation and significant habitats of indigenous fauna.</p> <p>Technical reviews confirm that there are no significant areas of indigenous vegetation or habitats in the proposed growth areas. Furthermore, no rare habitats, threatened habitats or at-risk habitats have been identified.</p>
<p><i>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></p> <ol style="list-style-type: none"> <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> <p><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.</i></p> <p><i>Policy HAZ-NH-P10: Development on land prone to flooding - 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></p> <ol style="list-style-type: none"> <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> 	<p>PPC3 gives effect to this One Plan objective and policy by avoiding and mitigating natural hazard risks through the spatial extent of zoning and plan provisions.</p> <p>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.</p> <p>Furthermore, a fault line traverses part of the Marton North-West 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.</p>

3.4 Rangitīkei Policies, Plans and Strategies

3.4.1 Growth Planning

Pae Tawhiti Rangitīkei Beyond | Community Spatial Plan

The Council prepared Pae Tawhiti Rangitīkei Beyond (see **Appendix 5**), which is a 30-year spatial and community plan, between mid-2021 until late-2023 when it was adopted. Pae Tawhiti Rangitīkei Beyond aims to manage the nature, location and structure of development across the district through to 2050.

It was developed under the guidance of an Advisory Group made up of Elected Members and iwi representatives. Substantial community engagement was undertaken during the development of the plan to understand the opportunities, challenges and aspirations of the communities within the district. Feedback from each community was used to inform their 'priorities' and to build an action plan for the implementation of the plan.

Growth and the ability to be able to appropriately manage and provide for this growth was a key part of the development of the plan. Pae Tawhiti Rangitīkei Beyond includes three (3) population growth scenarios with the highest projecting that the Rangitīkei District will reach a population of almost 25,000 people by 2050, an increase of almost 9,000.

Pae Tawhiti Rangitīkei Beyond identifies the four (4) concepts for managing growth within the Rangitīkei District which are:

- 1 Ensure sufficient land supply
- 2 Focus urban growth in Marton, Bulls, Taihape, Hunterville and Mangaweka
- 3 Enable papakāinga to be developed by iwi and hapū
- 4 Plan for expansion and intensification

Work on PPC3 commenced as an action for the implementation of Pae Tawhiti Rangitīkei Beyond. Many of the growth areas identified in the spatial plan were assessed and refined throughout the preparation of the proposed plan change. PPC3 is consistent with, and supports of the delivery of, Pae Tawhiti Rangitīkei Beyond.

Efficiency and Effectiveness Monitoring Report for the Residential and Rural Living Zones

The Council prepared an Efficiency and Effectiveness Monitoring Report (refer to **Appendix 6**) to assess how well the ODP provisions were working for Residential and Rural Living (Lifestyle) zones, with the goal of identifying whether rules are fit for purpose, need updating, or are missing elements.

The report found that the broad nature of how policies are expressed limits their effectiveness when implemented in assessing resource consent applications. In addition, a few residential development rules and standards are triggering resource consents where the adverse effects are limited and similar in nature to complying development.

Furthermore, the report found that the clarity of wording of a few rules could be improved to give more certainty and provide for consistent interpretation. The findings of this report have been used to inform PPC3.

3.4.2 Iwi Management Plans

Under s74(2A) of the RMA, the Council must take into account any relevant planning document that is recognised by an iwi authority and lodged with the Council (Iwi Management Plans).

Currently there are no Iwi Management Plans applicable within the Rangitikei District.

However, it is noted that Ngāti Hauiti produced an environmental policy statement in 1996, which sets out what matters it considered important, and would be pursued whenever it was given an opportunity under the RMA's consultation processes. This includes the Rangitikei River.

Ki Uta, Ki Tai Ngā Puna Rau o Rangitikei is a Rangitikei Catchment Strategy and Action Plan. Ngā Puna Rau o Rangitikei is a collective of iwi and hapū who have a connection to the Awa Catchment from source to sea. This strategy and action plan is noted.

3.4.3 Statutory Acknowledgements

The following treaty settlement legislation and incorporated statutory acknowledgements are relevant to the Rangitikei District:

- Ngāti Apa (North Island) Claims Settlement Act 2010
- Ngāti Rangi Claims Settlement Act 2019
- Rangitāne of Manawatu Claims Settlement Act 2016
- Ahuriri Hapu Claims Settlement Act 2021
- Heretaunga Tamatea Claims Settlement Act 2018
- Ngāti Tuwharetoa Claims Settlement Act 2018
- Nga Toa Rangatira Claims Settlement Act 2014

Currently, two iwi in the Rangitikei District have settled Te Tiriti o Waitangi | Treaty of Waitangi claims, which are Ngā Wairiki Ngāti Apa and Ngāti Rangi. The remaining iwi are all in the claim settlement process.

As part of these deeds of settlement are statutory acknowledgements that acknowledge areas or sites where iwi have significant relationship and connection with. Should urban growth development be proposed on sites containing or adjoining areas subject to statutory acknowledgement, the relevant iwi entity would be consulted. These areas are recognised under the RMA and summarised below:

Ngāti Apa (North Island)

The following Statutory Areas are subject to Ngāti Apa (North Island) Claims Settlement Act 2010:

- Ruakiwi
- Part of Rangitikei River
- Coastal Marine Area
- Part of Whangaehu River
- Part of Turakina River

None of these areas are within the proposed urban growth areas of PPC3.

Ngāti Rangi

The following Statutory Areas are subject to the Ngāti Rangi Claims Settlement Act 2019:

- Part Hautapu River

- Part Moawhango River
- Ngā Urukehu (being part Ngaurukehu Scientific Reserve)
- Part Turakina River
- Part Te Waiū-o-Te-Ika catchment within the Ngāti Rangī area of interest
- Te Waiū-o-Te-Ika Catchment

None of these areas are within the proposed urban growth areas of PPC3.

3.4.4 Any other relevant local plans or strategies (i.e. adopted by the Council under the Local Government Act powers)

Under section 74(2)(b)(i) of the RMA the Council must have regard to management plans and strategies prepared under other Acts. There are no other RDC plans or strategies that are relevant to PPC3.

3.5 Other legislation or regulations

Table 6 summarises additional legislative / regulatory requirements that are also relevant to PPC3:

Table 6: Other legislation or regulations

Legislation / Regulation	Relevant Provisions
<i>Building Act 2004</i>	This Act sets out the rules for construction, alteration, demolition and maintenance of new and existing buildings within New Zealand. It ensures that buildings can be used safely and improves controls in building design and construction to provide greater assurance to consumers.
<i>Heritage New Zealand Pouhere Taonga Act 2014</i>	<p>This Act requires that unless an <i>archaeological authority</i> is granted, archaeological sites must not be modified or destroyed. An archaeological site means:</p> <p><i>any place in New Zealand, including any building or structure (or part of a building or structure), that -</i></p> <p><i>(i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and</i></p> <p><i>(ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand;</i></p> <p>Those who wish to modify or destroy an archaeological site must obtain an archaeological authority from Heritage New Zealand Pouhere Taonga, under the process outlined in the Act.</p> <p>This Act is relevant to PPC3 because development that is otherwise enabled by PPC3 must still comply with the requirement to obtain (where relevant to the site) an archaeological authority e.g. part of the BUL02 growth area.</p>
<i>Council Engineering Standards</i>	Councils' Engineering Standards set out minimum engineering standards for land use, subdivision, and development (e.g. servicing requirements) across all zones.

3.6 Resource Management Act Reform

The evaluation in this report is based on the current statutory context (that is, implementing the current legislative requirements and current national and regional policy direction).

The Government has made several announcements relating to future legislative reform, including the introduction to Parliament of the Planning Bill and Natural Environment Bill at the end of 2025.

Current legislation continues to be in effect until proposed new legislation is passed and policies or regulations are gazetted, and it is the current statutory context which has informed the development of this plan change. The announced changes and Bills will not have legal effect until they are enacted by Government and formally passed into law and plans gazetted.

3.7 Local Government (Water Services) Act 2025 (Local Water Done Well)

Local Water Done Well is a Central Government mandated initiative to address concerns about Aotearoa New Zealand's water infrastructure and water quality. Rangitikei District Council adopted a joint water services delivery plan (**WSDP**) in August 2025, confirming the Council's partnership with Horowhenua District Council and Palmerston North City Council.

The WSDP sets out how drinking water, wastewater, and stormwater services will be delivered in the future, and outlines the pathway to establishing a jointly owned Water Services Council Controlled Organisation (**WS-CCO**).

In November 2025, the Government approved the partnership's joint WSDP, and the entity announced its new name "*Central Districts Water*".

Central Districts Water is expected to become operational in July 2027, with partner councils continuing to manage their own water services until then. Once operational, each council will retain ownership as shareholders of Central Districts Water. It is acknowledged that in the future the water services CCO will be responsible for the upgrade and servicing of growth areas identified to be rezoned in this proposed plan change.

3.8 Local Government Reform

The Government is exploring a major restructuring of how regional and local governance works in Aotearoa New Zealand. The aim is to make local government simpler, clearer, less duplicative, and more cost-effective.

The intended new regime may in time present future infrastructure funding opportunities; however, it does not necessitate any immediate action by RDC or in relation to the growth areas proposed for rezoning under PPC3.

4 Resource Management Issues Analysis

4.1 Background

The ODP provides a pathway for residential growth within existing urban areas. However, since the plan became operative in 2013 it has been identified that some of the existing provisions are no longer fit for purpose and additional development capacity needs to be provided for.

The Community Spatial Plan, Pae Tawhiti Rangitikei Beyond, was adopted by the Council in September 2023 following community engagement in 2022 and 2023. A key action of this plan was to rezone land for future housing, population growth and changing trends in spatial demands.

Council also undertook efficiency and effectiveness monitoring of the Residential Zone and Rural Living Zone of the Rangitikei District Plan in late 2023 to mid-2024. Through this monitoring, a few provisions were identified as no longer fit for purpose and not achieving the objectives in the ODP in an efficient or effective way.

Council proposes to revise these provisions in response to the above matters to ensure the District Plan reflects current development standards and trends and allow greater flexibility for situating buildings on sites (noting that since 2013 sites have trended to being smaller in size).

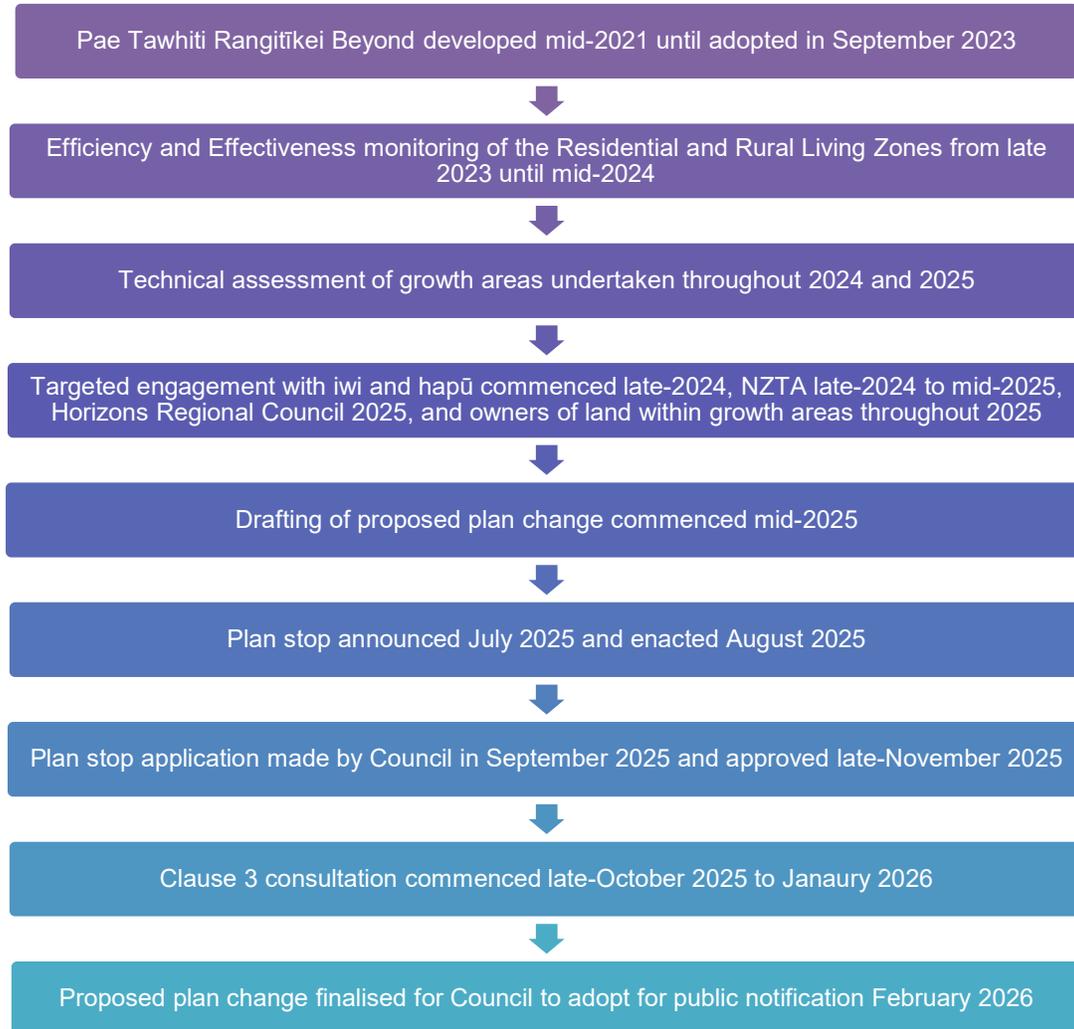
Proposed Plan Change 3 was considered necessary to respond to the following key issues:

- Issue 1: Lack of adequate land for short, medium and long term growth in housing
- Issue 2: Unplanned growth can result in ad hoc urban expansion and loss of rural land for productive purposes.

The purpose of the proposed plan change is to support Rangitikei District's long-term residential needs. These outcomes will be achieved by updating the framework for developing the areas identified for urban growth. PPC3 introduces the Marton North-West Structure Plan Area and associated provisions with a network of indicative roads, pedestrian access and open spaces to ensure efficient use and development of land.

The below diagram is a timeline which illustrates the key documents/milestones that have informed the development of PPC3 to date:

Diagram 1: Timeline of key documents/milestones that informed the development of PPC3



4.2 Evidence base

Council has reviewed the relevant parts of the ODP, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions.

The following sections outline this evidence.

4.2.1 Analysis of Operative District Plan provisions

4.2.1.1 Overview of Operative District Plan provisions

General Residential Zone

Under the ODP, Rangitikei contains a number of settlements of varying scale, including Marton, Bulls, Taihape and Hunterville. While each community is distinctive in size, setting, and character, the fundamental elements of the residential areas are similar enough to be managed under a single zone that is designed to achieve:

- Predominantly residential activities with a few compatible non-residential activities;
- A degree of consistency in the density, size, and scale of buildings with a reasonable amount of private open space;
- Accessibility to public open space;
- An adequate degree of privacy, access to sunlight, low levels of noise, vibration, odour, and dust; and
- A safe and functional road network for traffic, active transport modes and pedestrians.

There is a single Residential Zone in the ODP, with only one specific rule for retail activities on properties in Scott's Ferry, Koitiata, Turakina, Mangaweka, Utiku, Ōhingaiti and Mataroa.

The ODP identifies the key resource management issues for the General Residential Zone as:

- *Residents need to be able to use, develop, and enjoy their individual properties without their amenity values being adversely affected by neighbouring developments or use. Conversely, residents need to respect and protect their neighbours' amenity values when considering on-site development or use. These amenity values include access to daylight, openness, and the absence of unreasonable noise.*

The district has a diverse population with varied housing requirements. Residential areas need to provide for a variety of housing and lot sizes, including papakāinga housing, high quality residential subdivisions, and affordable housing.

The chapter contains a single objective which has remained in place since the District Plan was made operative in 2013:

Objective GRZ-01: Enable a variety of housing that reflects the aspirations and identity of people and communities while achieving good urban amenity and design. This includes the efficient use of existing infrastructure, and integration of pedestrian, cycling and vehicle transportation networks.

Under this objective are six policies which maintain the residential character and amenity values of those residential areas.

The objective is achieved through residential zone-specific permitted activity rules and standards. The rules permit residential activities and specific non-residential activities. Most non-residential activities are listed as either a restricted discretionary or discretionary activity to be assessed through the resource consent process.

Various permitted activity standards manage the nature and scale of development to maintain and enhance the character and amenity values of residential areas. Non-

compliance with the standards requires resource consent for a restricted discretionary activity (Rule GRZ-R1).

Rural Lifestyle Zone

Under the ODP, Rangitikei contains rural lifestyle areas around the main settlements being Marton, Bulls, Hunterville and Taihape. The fundamental elements of the Rural Lifestyle Zone are to provide a transition to the urban environment while maintaining the amenity associated with the General Rural Zone.

The ODP identifies the key resource management issues for rural lifestyle development under SUB-I1:

- *Unrestricted rural lifestyle development within rural areas would have significant adverse effects on primary production, natural features and landscapes, rural character, transport networks, and demand on services. It is necessary to ensure that provision of rural lifestyle development is located close to existing townships and in specified areas to avoid haphazard rural residential development and limit the loss of versatile soils.*

The Rural Lifestyle Zone chapter contains a single objective which has remained in place since the District Plan was made operative in 2013:

Objective RLZ-01: Rural lifestyle living is provided for in specified areas.

Under this objective is a single policy which seeks to preserve rural amenity and versatile soils.

The objective is achieved through zone-specific permitted activity rules and standards. The rules permit residential activities and specific non-residential activities. Most non-residential activities are listed as either a permitted, restricted discretionary or discretionary activity with the latter two required to be assessed through the resource consent process.

Various permitted activity standards manage the nature and scale of development to maintain the density and amenity values of the Rural Lifestyle Zone. Non-compliance with the standards requires resource consent for a restricted discretionary activity (Rule RLZ-R1).

Subdivision

The subdivision rules and minimum lot size for the General Residential Zone and Rural Lifestyle Zone are contained in the Subdivision chapter, under Part 2: District Wide Matters.

There are no objectives contained in the Subdivision chapter and it instead refers to objectives of other chapters. There are seven policies which address subdivision in the General Residential Zone and General Rural Zone. No specific policy for rural lifestyle subdivision is provided.

The ODP only has two activity statuses for subdivision which are Restricted Discretionary and Discretionary. Restricted Discretionary consents can be granted or declined by Council but only the matters that Council has 'restricted its discretion' to can be considered when processing a consent. Discretionary consents can be granted or declined by Council and any matters that are considered appropriate can be assessed.

The minimum lots sizes in the subdivision rules of the ODP for the General Residential and Rural Lifestyle Zones are:

- General Residential Zone - 400 square metres
- General Residential Zone - 800 square metres (Taihape West Area)
- Rural Lifestyle Zone - two hectares'

4.2.1.2 State of the environment monitoring

The total number of building consents granted for dwellings in the Residential Zone for the 5-year period between 1 January 2019 and 31 December 2023 was:

- New builds: 194
- Relocated: 74

Table 7 below identifies where the consented dwellings were located. It includes all new builds and relocated dwellings (in both Residential and Rural Living Zones) that were granted building consent during the 5-year period evaluated.

Table 7: Consented dwellings

Settlement	Total consented dwellings
Bulls	61
Huntermville	1
Marton	195
Ōhingaiti	4
Taihape	6
Turakina	4

The data found that there are several permitted activity standards in the Residential Zone that consistently trigger land use consents and/or Deemed Permitted Boundary Activity Approvals. The most notable are the 5-metre road setback requirement, the 3 metre setback requirement for facades containing a habitable room window, and the daylight setback requirement.

In terms of residential subdivisions, there were 58 in Marton and 25 in Bulls during the 5-year period evaluated. The total number of subdivisions approved during the evaluation period consented a total of 552 additional lots in the Residential Zone. The data indicates that most subdivisions complied with shape factors and minimum lot sizes.

For the activity status of the subdivisions, 56 were Restricted Discretionary and 36 were Discretionary.

From the data available, the average/mean lot size (excluding balance lots) over the 5-year period assessed, was 733sqm and the median and mode lot size was 585sqm. Out of the 552 residential lots consented only 37 lots (7%) were less than the 400sqm

minimum lot size specified in the District Plan for Residential properties (excluding the Taihape West Area).

Given that Special Assessment Policy A6-1.4 provides a pathway for undersized lots and that the average, mean, and mode lot sizes are substantially greater than the 400sqm minimum lot size it is considered that this minimum lot size is largely still sufficient for most infill and greenfield subdivisions occurring in the district.

4.2.1.3 Effectiveness of Operative District Plan provisions

Through the efficiency and effectiveness monitoring referred to earlier, issues that have been identified with some provisions in the ODP through consultation and review by Council staff. The following issues have been identified with the effectiveness of the ODP:

- The objectives and policies for the General Residential and Rural Lifestyle Zones do not reflect the need to zone sufficient land to provide development capacity to meet expected demand for housing over the short, medium, and long term.
- There is an inefficient amount of land available for housing, and Marton and Bulls need to be prioritised to provide for growth projections.
- The existing residential provisions are no longer fit for purpose and result in inefficient outcomes.
- The provisions do not encourage a sufficient range of dwellings to be constructed to meet a variety of needs.
- The yard setbacks and daylight setbacks are triggering resource consent for proposals which are not detracting from the character and amenity values of the urban environments, which is an inefficient approach.
- The subdivision provisions do not allow for the creation of smaller residential lots to better provide for variety of housing and intensification.
- Development of greenfield land does not have a structured way and be integrated with the provision of infrastructure to achieve a well-functioning urban environment. The recent development pattern of Marton has resulted in cul-de-sacs which has resulted in poor growth patterns.

4.2.1.4 Analysis of other District Plan provisions relevant to this topic

Current practice has been considered in respect of this topic, in particular the use of structure plans and intensification areas. A review was undertaken of the following comparable councils' District Plans to better understand the use of these planning mechanisms, summarised in Table 8 below:

- Whanganui District Council – Whanganui District Plan
- Taupō District Council – Taupō District Plan
- Manawatū District Council - - Manawatū District Plan
- South Taranaki District Council – South Taranaki District Plan
- Stratford District Council – Stratford District Plan

These plans were selected because:

- Whanganui, Taupō and Manawatū are all adjacent to Rangitikei and therefore may have faced and addressed similar concerns; and
- The councils are of a similar scale to the Rangitikei District and are likely confronting similar issues relating to this topic.

Table 8: Other District Plan analysis

Plan	Structure Plan	Residential Intensification Area (or similar)	Description of approach
Whanganui District Plan	Yes	No	<p>WDC's District Plan has two Structure Plans. Both Structure Plans include residential areas to facilitate residential development by managing the location, form and scale.</p> <p>The standards for the WDC Structure Plans include maps with indicative water and wastewater infrastructure, landscaping areas, indicative roads and underlying zoning. Both Structure Plans also include transport connections, infrastructure, public spaces and nature reserves. The performance standards for the underlying zone also need to be considered for development within a Structure Plan Area.</p> <p>WDC's District Plan does not include an intensive infill overlay as a tool to manage development.</p>
Taupō District Plan	No	No – but multiple residential zones	<p>TDC's District Plan does not include Structure Plans or intensive infills overlay as a tool to manage development. However, 'concept plans' are used for managing development on single sites/development areas.</p> <p>The TDC relies on existing zoning and rules to manage how development occurs within each zone.</p> <p>There is a Future Development Strategy similar to RDC's Community Spatial Plan which identifies areas suitable for urban growth and the next steps. No urban growth plan changes have been notified at the time of writing this report.</p> <p>It is noted that TDC's district plan does have multiple residential zones including:</p> <ul style="list-style-type: none"> • General residential zone • Medium density residential zone and • Low density residential zone
Manawatū District Plan	Yes	No – but have development areas	<p>MDC's District Plan has four Structure Plans, which include residential areas to facilitate residential development by managing the location, form and scale.</p> <p>The standards for the MDC Structure Plans include maps with indicative water</p>

			<p>and wastewater infrastructure, landscaping areas, indicative roads and underlying zoning. The performance standards for the underlying zone also need to be considered for development within a Structure Plan Area.</p> <p>It is noted that MDC's District Plan does have additional residential zones including:</p> <ul style="list-style-type: none"> • General Residential zone • Settlement zone
South Taranaki District Plan	Yes	Yes	<p>STDC's District Plan has two Structure Plan areas. Both Structure Plans include residential areas to facilitate residential development by managing the location, form and scale, one contains mainly industrial and commercial land.</p> <p>The standards for the STDC Structure Plans include maps with indicative water and wastewater infrastructure, landscaping areas, indicative roads and underlying zoning. Both Structure Plans also include transport connections, infrastructure, public spaces and nature reserves. The performance standards for the underlying zone also need to be considered for development within a Structure Plan Area.</p> <p>STDC's District Plan contains a 'Residential – Intensification Area' to provide for more intensive (smaller lot sizes) within the residential areas surrounding the Hawera town centre.</p>
Stratford District Plan	No	No	<p>SDC's District Plan does not include Structure Plans or intensive infills overlay as a tool to manage development.</p> <p>Rather the plan relies on zoning and rules to manage how development occurs within each zone.</p>

A summary of the key findings follows:

- There are large variations in the number and content of objectives and policies for residential and rural lifestyle subdivision and development as they can be very tailored specifically for their community and environment.
- Enabling objectives and policies were common to provide for urban growth, including supporting the use and purpose of structure plans, and providing for both infill development and greenfield development.
- Bulk and location standards were broadly similar across District Plans, including exemptions for elements of buildings.

- Structure Plans are an effective method to manage urban growth and the pattern and form of development to meet the short, medium and long-term needs of the community.
- Councils that are not Tier 1 or 2 are still implementing rezoning and/or Structure Plans and areas for urban growth to give effect to the NPS-UD.
- Rules specific to residential zones and the subdivision chapter ensure development within a structure plan area is managed in a way that enhances the area.
- Only some plans use a residential intensification layer (or similar). Other District Plans used a range of residential zones to provide for varying densities. Plans that use multiple residential zones are typically larger, more urban districts compared to RDC.

4.2.2 Advice received from Iwi/hapū

Informal engagement has been undertaken with Ngā Wairiki Ngāti Apa and Ngāti Parewahawaha and Council officers have reached out with offers to meet with representatives of Ngāti Hauiti. These are the iwi/hapū with urban growth areas or proposed residential intensification areas in their rohe.

Section 32(4A) of the RMA requires evaluation reports to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

Under Clause 4A of Schedule 1 of the RMA local authorities are also required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under Clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

Draft plan change documents were sent to iwi authorities on 23 October 2025. No specific advice has been received on the draft plan change and proposed provisions evaluated within this report.

Notwithstanding no direct advice being received on the draft plan change, iwi, hapū and Māori more generally have been involved through the development of the Community Spatial Plan which has informed PPC3.

In preparing PPC3, emails, meetings and presentations have been sent, offered or held with iwi/hapū including Ngā Wairiki Ngāti Apa and Ngāti Parewahawaha, and Te Rōpū Ahi Kā Komiti (a marae representatives committee).

Draft versions of the Archaeological Scoping Assessments (refer to **Appendix 7 and 8**) undertaken for the growth areas of Bulls and Marton were circulated to Ngā Wairiki Ngāti Apa (both the Bulls and Marton's assessments) and Ngāti Parewahawaha (Bulls assessment only) for them to read and provide comments on. No specific comments were received.

Some key themes and advice received to-date throughout the engagement includes:

- strong interest in ongoing involvement and desire for regular updates.
- strong interest in enabling and improving papakāinga development across the district.

While PPC3 does not contain specific provisions for papakāinga development, it provides development opportunities for all types of housing, including papakāinga.

RDC will continue to engage with iwi and hapū throughout the process.

4.2.3 Consultation Overview

Consultation with landowners and residents within Rangitikei and the growth areas was undertaken as part of the preparation of Pae Tawhiti Rangitikei Beyond. The purpose of consultation was to better understand the nature and key elements of the growth areas, as well as opportunities and concerns about the need for growth areas within the district. Landowners raised a number of matters including:

- A need for more housing choices including infill, higher density, and rural lifestyle options.
- Ensuring housing growth occurs in suitable, hazard-free areas.
- Enabling papakāinga development.
- Concern about adequate infrastructure to support future population growth.
- Need for safer traffic flow through towns and better public transport options and active transport networks.
- Protecting and improving rivers, streams and wetlands.
- Concerns with flood risk, stormwater management and climate resilience.

Engagement has continued with landowners in the growth areas that have been assessed for rezoning as part of PPC3. This was done throughout 2025 to let them know that RDC was assessing their land, why this was being done, and to provide landowners with the opportunity to ask any questions or raise any concerns.

Some landowners got in touch to raise concerns that they had and/or to ask questions. Key themes included whether they would be able to continue to use their property in the way that they currently do if it was to be rezoned, whether their rates would be impacted or whether they would be forced to developer sell their land if it was rezoned.

Limited engagement on this plan change has also taken place with key agencies including the New Zealand Transport Agency Waka Kotahi (NZTA) and Horizons Regional Council.

NZTA requested that the Council undertake an Integrated Transport Assessment which was subsequently commissioned (**Appendix 9**). An online meeting was held between NZTA, Council officers and Stantec in July 2025 to discuss the transport matters of the proposed plan change and the draft ITA. A follow up meeting was subsequently held in August 2025 between the same parties, including representatives from NZTA's Road Safety team. In response to those discussions and feedback received from NZTA, further analysis was included on strategic State Highway intersections in the ITA.

Horizons Regional Council raised a number of concerns including flood hazards and the need for an ecological assessment. An Ecological Assessment (**Appendix 10**) and flood hazard reports (**Appendix 14**) were subsequently commissioned.

Minor amendments to the growth areas have been made in response to this consultation undertaken. For other issues raised existing mechanisms are in place to address outstanding issues, such as new road access onto the SH1.

In accordance with Schedule 1, clause (3)(1) of the RMA, the following parties have also been consulted during the preparation of PPC3:

- the Minister for the Environment;

- the Minister for Housing, Infrastructure, RMA Reform and Transport (i.e. Hon Chris Bishop);
- Horizons Regional Council and relevant territorial authorities; and
- The Executive Director WSCCO Establishment - the 3 Waters Council Controlled Organisation that RDC is part of (i.e. Central Waters District).

No feedback was received from any of these parties.

4.2.4 Technical Advice

RDC has commissioned technical assessments to better understand the opportunities, constraints and features of potential urban growth areas, and development issues in the district. This section of the report provides an overview and summarises these assessments.

4.2.4.1 Population / Demand Projections

Due to its size, RDC is not a Tier 1, 2 or 3 local authority under the NPS-UD. Therefore, RDC is not specifically required to prepare a Housing and Business Capacity Assessment under the NPS-UD. However, RDC has assessed the existing supply and demand for housing utilising existing available information on population and demand projections.

Pae Tawhiti Rangitikei Beyond, Council's Community Spatial Plan (**Appendix 5**) was developed between 2021 and 2023. This plan is future focused and was developed by Council with engagement with the community. As already covered earlier in this report, this plan identifies the community's aspirations for how the district will grow over the next 25+ years.

The spatial plan includes three population growth scenarios of 0.8%, 1.2% and 1.5%. These scenarios were used to project the district's population in 2050 as shown in Table 9.

Table 9: Growth Scenarios for the Rangitikei District

Growth Scenarios			
Projected % increase	0.8%	1.2%	1.5%
2050 Population	20,740	22,527	24,988
Total additional dwellings	2,162	2,941	4,013

Marion is the largest urban area within the district and is projected to account for 44% of urban growth. The current Residential zoned land provision is estimated to be sufficient for the next 12 – 22 years, depending on the growth rate of Marion and provided all land identified as being 'available' is developed or redeveloped. However, there is an undersupply of residentially zoned land (between 22 – 98 hectares depending on the growth scenario) in the longer term.

Bulls is the second largest urban area within the district and is projected to account for 25% of urban growth. The current Residential zoned land provision is estimated to be

sufficient for the next 10 – 20 years, depending on the growth rate of Bulls and provided all land identified as being ‘available’ is developed or redeveloped. However, there is an undersupply of residentially zoned land (between 18 – 61 hectares) in the longer term.

Based on existing available information, it is considered that the District Plan, with PPC3 changes, provides sufficient development capacity to meet housing demand and is expected to provide sufficient development capacity for business demand, consistent with Policy 2 of the NPS-UD.

4.2.4.2 Archaeological Scoping Assessment

inSite Archaeology Ltd prepared two preliminary assessments with respect to archaeology / heritage of the proposed Marton and Bulls growth areas, some of which are proposed to be rezoned under PPC3. The results of these assessments are summarised below, for the full assessments refer to **Appendix 7** and **Appendix 8**.

Historical Context (All growth areas):

- Māori occupation: Likely in the area but no recorded sites in any growth area.
- Pākehā occupation: Early homesteads were outside the growth areas.

Marton

- There were no known archaeology sites within any of the growth areas.

Bulls

- BUL02 – The review determined the racecourse and polo ground as sites of archaeological significance:
 - The Rangitikei Race Club is one of the earliest racecourses in New Zealand and established pre-1900. The growth area has been reduced in spatial extent and this racecourse land has been excluded from the scope of PPC3.
 - The Polo club also has archaeological significance, though no above ground physical archaeological evidence is recorded. The archaeological authority process would manage development of this growth area and potential effects on archaeological values. This site is proposed to be rezoned and no changes are recommended for PPC3.
- BUL03 – no known archaeology sites.

4.2.4.3 Integrated Transport Assessment

Stantec prepared an Integrated Transport Assessment in respect of greenfield sites identified as being suitable for future rezoning to accommodate residential development. Refer to **Appendix 9** for the full assessment which is summarised below.

- Small areas (**BUL03** and **part-MAR04**) have limited traffic effects and mostly require minor or no upgrades.
- **BUL02**: If it was to be developed in its entirety then it would require a major new SH1 intersection (channelised T intersection or roundabout), located within the 50km/h zone for safe access.
- **Partial development of BUL02 (identified as ‘BUL02 Option B’)**: Access could be achieved solely off Watson Street, albeit with upgrades to bring the connecting section of Watson Street between SH1 and a new site accesses to a more urban standard.

- **MAR01:** Needs two collector standard access points onto Tutaenui Road; one could be a roundabout forming a northern gateway. A secondary link via Armagh Terrace is possible but may require upgrading and/or parking restrictions.
- **MAR02:** Primary access should be via Wanganui Road, with a secondary link via Milne Street or Johnston Road. Both options need upgrading for two-way width; Milne Street/Bond Street intersection also requires safety improvements. Johnston Road upgrading would be more extensive and less direct to the town centre.
- **MAR07:** Access only via Milne Street; therefore, Milne Street must be upgraded to collector standard, and the Milne Street/Bond Street intersection improved for safety.

The improvements and requirements can be shown on the Structure Plan (where applicable) or implemented through the existing transport provisions in the OPD. Case-by-case assessments through resource consent process and the imposition of conditions would ensure these transport upgrades are undertaken as and when development occurs.

4.2.4.4 Ecological Assessment

Boffa Miskell prepared an Ecological Constraint Study for potential growth areas identified within the Community Spatial Plan for Bulls, Marton, Mangaweka and Taihape. Refer to **Appendix 10** for the full assessment.

The assessments specific to the PPC3 growth areas are summarised below:

MAR01, MAR02 & MAR07

- The growth areas are mainly exotic pasture grassland dominant with low constraints on growth.
- However, the ecological assessment has determined several waterways / ephemeral streams associated with the Tūtaenui catchment and two small potential natural inland wetlands.

Part-MAR04

- Low constraints only with pasture grassland, with shelterbelts / isolated trees.

BUL02

- The growth area is mainly exotic pasture grassland dominant with low constraints on growth.
- The only ecological constraint is the waterway / drain running through the site.

BUL03

- Low constraints only with pastoral grassland. The growth area is constrained by an existing waterway / drain, one potential natural inland wetland (~0.2 ha) and its proximity to Tūtaenui Stream floodplain (0.5% AEP).

4.2.4.5 Geotechnical Review

LDE Ltd has prepared a geotechnical review and assessment for potential future residential development areas for Bulls, Marton and Mangaweka. Refer to **Appendix 11** for the full assessment.

The assessments for the PPC3 growth areas are summarised below:

- The growth areas are generally considered acceptable for future residential development.
- All growth areas have high-strength soils suitable for TC1 / NZS3604 foundations.
- All growth areas have low or negligible liquefaction potential.
- All growth areas have low slope instability risk.
- No major constraints except for stormwater considerations and the mapped fault in Marton (MAR02).

4.2.4.6 Three Waters Assessment

GHD has prepared a 3 Waters Growth Strategy and associated Growth Assessment to assist RDC in understanding what growth areas are 'infrastructure-ready' and what areas require infrastructure upgrades.

Refer to **Appendix 12** for the full assessment.

The assessments for the PPC3 growth areas are summarised below under 'Infrastructure Requirements'.

GHD produced a summary of which growth areas and infill areas require network upgrades and this is provided in Table 10 below.

Table 10: Requirement of network augmentations to service growth areas

Growth Area			
	Water Supply Upgrades (Yes/No)	Wastewater Network Upgrades (Yes/No)	Stormwater Network Upgrades (Yes/No)
MAR01	Yes	Yes	Yes
MAR02	Yes	Yes	Yes
MAR07	Yes	No	Yes
Combined (MAR01, MAR02, MAR04 – partial, and MAR07)	Yes	Yes	Yes
BUL02	Yes	Yes	Yes
BUL03	Yes	No	No
Infill Area			
Bulls infill	Yes	No	No
Marton infill	Yes	No	No
Taihape infill	No	No	No

Infrastructure Requirements

Marton

- Water supply relies on a single trunk main, creating vulnerability and reduced operational resilience. An upgrade to the trunk main is identified to support growth, with two options available.
- High pressures overall, with the majority of the hydrants able to support FW2 fire flow, except for some hydrants at network edges.
- Wastewater network experiences widespread wet-weather surcharging with predicted manhole spills and overflow to the Tutaenui Stream. Upgrades are identified to wastewater mains will enable growth.
- Stormwater modelling shows overland flow paths and localised flooding across multiple streets, with deeper ponding in low-lying areas.

Bulls

- Ageing water supply pipes contribute to low pressures in northern and eastern areas and increased head loss.
- Firefighting capacity is generally adequate throughout the town, except for hydrants at the network fringes.
- Wastewater network shows high inflow and infiltration and wet-weather surcharging toward the treatment plant, though no spills are predicted.
- Stormwater modelling identifies major overland flow paths crossing SH3 and significant ponding across several neighbourhoods.

These are existing performance issues that require upgrading to ensure service reliability and environmental protection, GHD concluded that some components of the network are already operating at or near their functional limits.

Given these underlying constraints, the need for upgrades across water supply, wastewater, and stormwater networks arises regardless of growth. Future development does not fundamentally change the existing constraints. The existing ODP provisions and resource consent processes provide mechanisms to coordinate upgrades as development proceeds.

As discussed under section 3.7, RDC adopted a joint WSDP in partnership with Horowhenua District Council and Palmerston North City Council (*Central Districts Water*). As RDC transitions to Central Districts Water, this CCO will plan and budget for the upgrades of 3 Waters infrastructure across the district.

Furthermore, case-by-case assessments through a resource consent process and the imposition of conditions would ensure these infrastructure upgrades are undertaken as and when development occurs.

4.2.4.7 Wastewater Treatment Plant Assessment

GHD has prepared a Wastewater Treatment Plant (WWTP) assessment for Marton, Bulls and Taihape, to assist RDC in understanding the impact of the proposed growth strategy on the recent work carried out at the WWTPs. Refer to **Appendix 13** for the full assessment. The assessment is summarised below.

The options shortlisted for the Marton and Bulls WWTPs allow for more capacity than the GHD growth assessment scenarios (discussed above in section 4.2.4.6). Therefore, it is reasonable to assume that the capacity of the proposed WWTP upgrades will not be affected by the growth scenarios.

However, GHD has noted that if the Marton combined scenario is realised, the WWTP upgrades will not have enough capacity to cater for the population if it occurs before 2055.

For the Taihape WWTP, there are current and short-term performance issues. Interim works could be undertaken to improve the operability of the existing plant. Long term solutions are required in Taihape to meet growth forecasts.

As discussed above, as RDC transitions to the Central Districts Water, this CCO will plan and budget for the upgrades of 3 Waters infrastructure across the district including the required upgrades to the WWTPs.

4.2.4.8 Flood Risk

BUL03 was an identified future growth area as it scored well on its proximity to amenities, access to key transport networks, existing wastewater and water and is relatively flat in topography. The main issue with this site is that roughly half of it is identified as being subject to 0.5% AEP (1-in-200-year) flood event.

E2environmental prepared a flood risk assessment (**Appendix 14**) of BUL03 to determine the appropriateness of developing this area given the flood risk. The report concludes that part of BUL03 can be developed for residential use, but not the entire site due to the significant flood hazards.

Figure 1 below shows the area considered appropriate for residential development, with the remaining part of the site recommended to be utilised for stormwater and flooding management within the growth area.

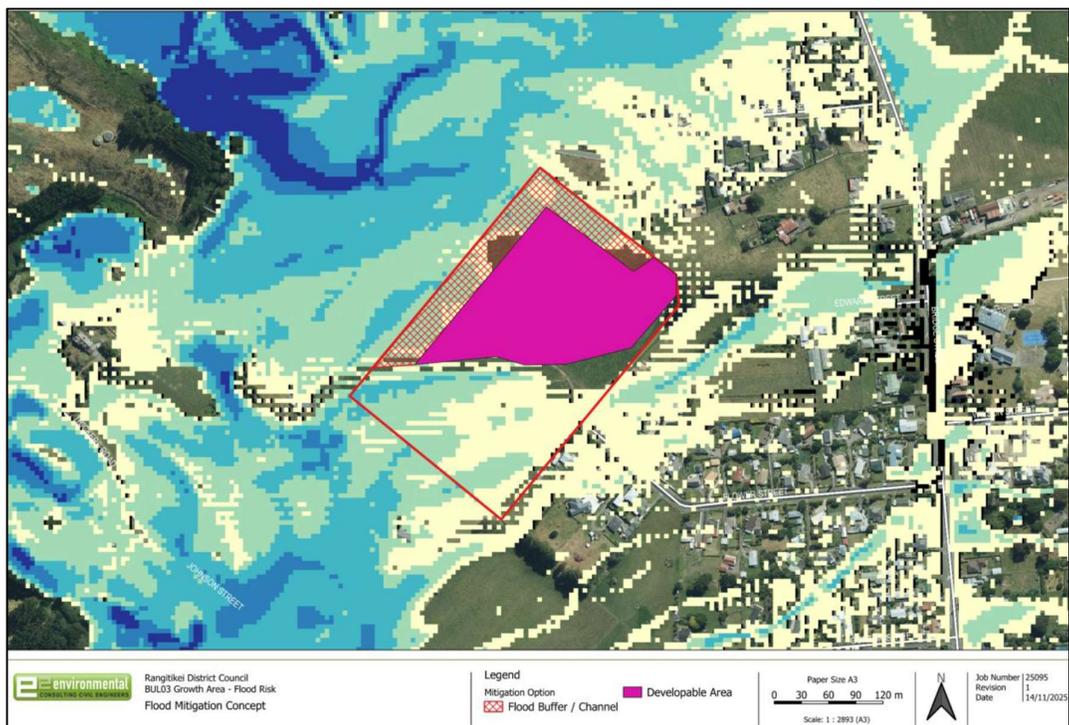


Figure 1: BUL03 concept for development

4.2.4.9 Contaminated Land

A review of Council’s records was undertaken in 2024 for the growth areas to determine whether any sites were likely subject to the Hazardous Activities and Industries List (‘HAIL’) or were potentially contaminated from past land uses. This review indicated that none of the growth areas, with the exception of part of MAR02, have any records or known historical uses that would trigger HAIL status.

The MAR02 area was previously used as a boysenberry farm, which can be associated with residual contaminants. However, the landowners have completed Preliminary Site Investigations (‘PSI’) in accordance with the National Environmental Standard for Assessing and Managing Contaminants in Soil (‘NES-CS’). The PSI recommended that a Detailed Site Investigation (‘DSI’) should be undertaken with a focus on fungicide use containing copper. The DSI concluded that copper levels in soils analysed were below predicted background concentrations at locations across the site and that the NES-CS does not apply to the site.

Based on this information no further investigation under the NES-CS was considered to be required for the growth areas.

4.3 Summary of relevant resource management issues

Based on the research, analysis and consultation outlined above, Table 11 summarises the following issues has been undertaken in relation to PPC3:

Table 11: Summary of Issues

Issue	Comment
Issue 1: Lack of adequate land to meet the needs for short, medium and long term growth	<p>RDC does not have enough available residential land to supply the projected population growth over the next 25+ years. Furthermore, existing provisions of the ODP restrict development within existing residential zones undermining potential growth on brownfield land.</p> <p>It is necessary to enable growth of residential areas and intensification in existing residential areas to accommodate anticipated population growth. Work to achieve this includes identifying which areas are more suited to intensification and growth.</p>
Issue 2: Unplanned growth can result in ad hoc urban expansion and loss of rural land for productive purposes	<p>Rangitikei is a rural district with most settlements containing highly productive land. There is a significant portion of the rural environment that would be considered ‘highly productive’ by the NPS-HPL and requires appropriate protection. Without appropriate protection, there is potential for further loss to the productive land through inappropriate land use and subdivision.</p> <p>The District Plan’s subdivision provisions need to assist in limiting further loss and fragmentation to highly productive land by directing users to existing rural lifestyle zones.</p>

5 Scale and significance

5.1 Evaluation of scale and significance

Under s32(1)(c) of the RMA, this evaluation report needs to contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

Table 12 below assesses the scale and significance of the PPC3 provisions to determine the level of analysis required.

Table 12: Evaluation of scale and significance

Factor	Score		
	Low	Medium	High
Degree of change from the ODP	X		
<p>PPC3 will deliver new residential zoned land on the urban fringes of Marton and Bulls. In addition, a new Residential Intensification Area overlay would allow smaller lot sizes for subdivision within a defined area around the Marton, Bulls and Taihape urban centres. Finally, a Marton North-West Structure Plan Area will guide development within Marton combined growth areas (MAR01, MAR02 and MAR07) to achieve coordinated and compatible development and ensure appropriate open space, natural hazard mitigation and secure connections to existing roads.</p> <p>The proposed suite of changes to the existing provisions are relatively small and discrete. They are focused on amending a few provisions in the General Residential Zone and Rural Lifestyle Zone as well as the Subdivision Chapter, and rezoning specific areas of land. As such, the degree of change from the ODP is considered low.</p>			
Effects on matters of national importance	X		
<p>The effects on matters of national importance are considered low as there are no substantive intersection between the growth areas and potential effects on section 6 matters of the RMA.</p>			
Scale of effects - geographically		X	
<p>The scale of effects is considered medium as it relates to rezoning specific parts of General Rural zoned land to residential within Marton and Bulls. Some of these areas are relatively large spatially in the context of the two towns and the entire district, in particular the Marton North-West Structure Plan Area.</p> <p>The Residential Intensification Area overlay relates to small parts of existing urban areas of Marton, Bulls and Taihape, and is considered to have a low impact.</p>			
Scale of effects on people e.g. landowners, neighbourhoods, future generations		X	
<p>The scale of effects on people is considered medium; the rezoned land would impact approximately 32 parcels. Land within the Residential Intensification Area overlay would impact a greater number of land parcels.</p> <p>Regarding effects on the wider community, there would be an increase in traffic movements and demand on services. However, in the context of the entire district, the scale of effects are relatively small. Overall, the scale of effects on people are considered moderate.</p>			

Scale of effects on those with specific interests e.g. tangata whenua	X		
<p>Tangata Whenua have an interest in future urban development across the district and the impact it may have on the natural environment, particularly biodiversity, water and land. NZTA also has a specific interest on PPC3 due to SH1 and SH3 navigating through Bulls.</p> <p>New provisions and existing provisions within the ODP limit or otherwise address any effects on the natural environment and transport network. The scale of effects on those with specific interests is considered low.</p>			
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?	X		
<p>PPC3 is the subject of an exemption application that evaluates its alignment with current Government priorities. With ongoing RMA reforms and anticipated changes to regional and district planning frameworks, PPC3 is intended to provide an interim planning solution for the district until the new national planning legislation is implemented. During this transition period, it remains essential to ensure that urban growth can continue to be appropriately enabled.</p> <p>PPC3 meets the district's long term urban growth needs by releasing land for greenfield development as well as providing more opportunity for urban intensification, amending provisions that add unnecessary cost to urban development locally, and introduce a policy framework that is more directive and enabling of urban growth and development. Accordingly, the policy risk is considered low.</p>			
Likelihood of increased costs or restrictions on individuals, communities or businesses		X	
<p>The likelihood of increased costs or restrictions on individuals and communities is considered medium due to potential infrastructure upgrades and potential for property owners to obtain a resource consent to develop within new urban growth areas, particularly within the Marton North-West Structure Plan Area.</p>			

Overall, for the above reasons, it is considered that the scale and significance of the proposal is **low-medium**.

5.2 Quantification of Benefits and Costs

Section 32(2)(b) of the RMA requires that, where practicable, the benefits and costs of a proposal are to be quantified.

In general, a qualitative assessment of costs and benefits associated with PPC3 is considered sufficient, and this is provided for in the assessment of policies, rules and other methods contained in section 6.0 of this report. However, where practicable and considered appropriate to support the evaluation, some of the benefits or costs have been quantified. The identification of costs and benefits has been informed by the body of evidence outlined in section 4.0 of this report.

6 Proposed provisions

6.1 Overview of Proposed Provisions

6.1.1 Overview of Subdivision Provisions

PPC3 proposes the following changes to the Subdivision Chapter of the ODP. Refer to **Appendix 1.1** for the complete list of proposed changes:

- Add a new policy to provide for subdivision in the Rural Lifestyle Zone while managing the effects.
- Add new policies to recognise and provide for more intensive/denser subdivision and development within the Residential Intensification Area.
- Add a new policy to manage subdivision within the structure plan area.
- Add a new performance standard that subdivision is to be in accordance with any relevant structure plan.
- Add a new performance standard that subdivision within the Residential Intensification Area has a minimum lot size of 250 square metres.
- Add a new performance standard that subdivision in the Marton and Bulls Rural Lifestyle Zone is enabled to 5000sqm subject to containing a suitable building platform free of flood hazards with minimum dimensions. Other Rural Lifestyle zones are subject to the existing 2-hectare subdivision standard.

6.1.2 Overview of General Residential Zone Provisions

PPC3 proposes the following changes to the General Residential Zone of the ODP. Refer to **Appendix 1.2** for the complete list of proposed changes:

- Add a series of new issue statements and objectives to reflect the current issues and outcomes sought for the General Residential Zone.
- Amend policies to better reflect the outcomes sought for the General Residential Zone, including the need to provide sufficient land to meet expected demand for housing over the short, medium, and long term.
- Add a new rule requiring buildings and structures within the structure plan area to be located in accordance with the structure plan maps.
- Amend rules and standards for building setbacks and height in relation to boundary to remove duplication and simplify requirements.
- Amend maximum building coverage standard to provide for higher coverage on smaller sites.
- Amend site area standard to provide for smaller sites in the Residential Intensification Area.
- Amend outdoor living space standard to require smaller spaces on smaller sites.
- Add a new fence standard and structure plan standard.

6.1.3 Overview of Rural Lifestyle Zone Provisions

PPC3 proposes the following changes to the Rural Lifestyle Zone of the ODP. Refer to **Appendix 1.3** for the complete list of proposed changes:

- Add a series of new issue statements and objectives to reflect the current issues and outcomes sought for the Rural Lifestyle Zone.
- Add a new building setback of 15m from any waterbodies.
- Amend the standard for maximum number of residential units per site to clarify the number of units based on property size, including providing more flexibility where sites are connected to Council's reticulated wastewater network.
- Amend the planting setback standard to remove duplication and conflict with the National Environmental Standard for Commercial Forestry.

6.2 Proposed Maps

6.2.1 Proposed rezoning of Marton and Bulls

PPC3 proposes to rezone land within Marton and Bulls from General Rural Zone of Rural Lifestyle Zone to General Residential Zone. The growth areas identified are shown in **Appendix 4**. The following growth areas are proposed to be rezoned:

- Marton: MAR01, MAR02, MAR07 (these three growth areas are the subject of the Marton North-West Structure Plan Area) and part-MAR04 (refer to **Figure 2**); and
- Bulls: Part-BUL02 and Part-BUL03 (refer to **Figure 3**).

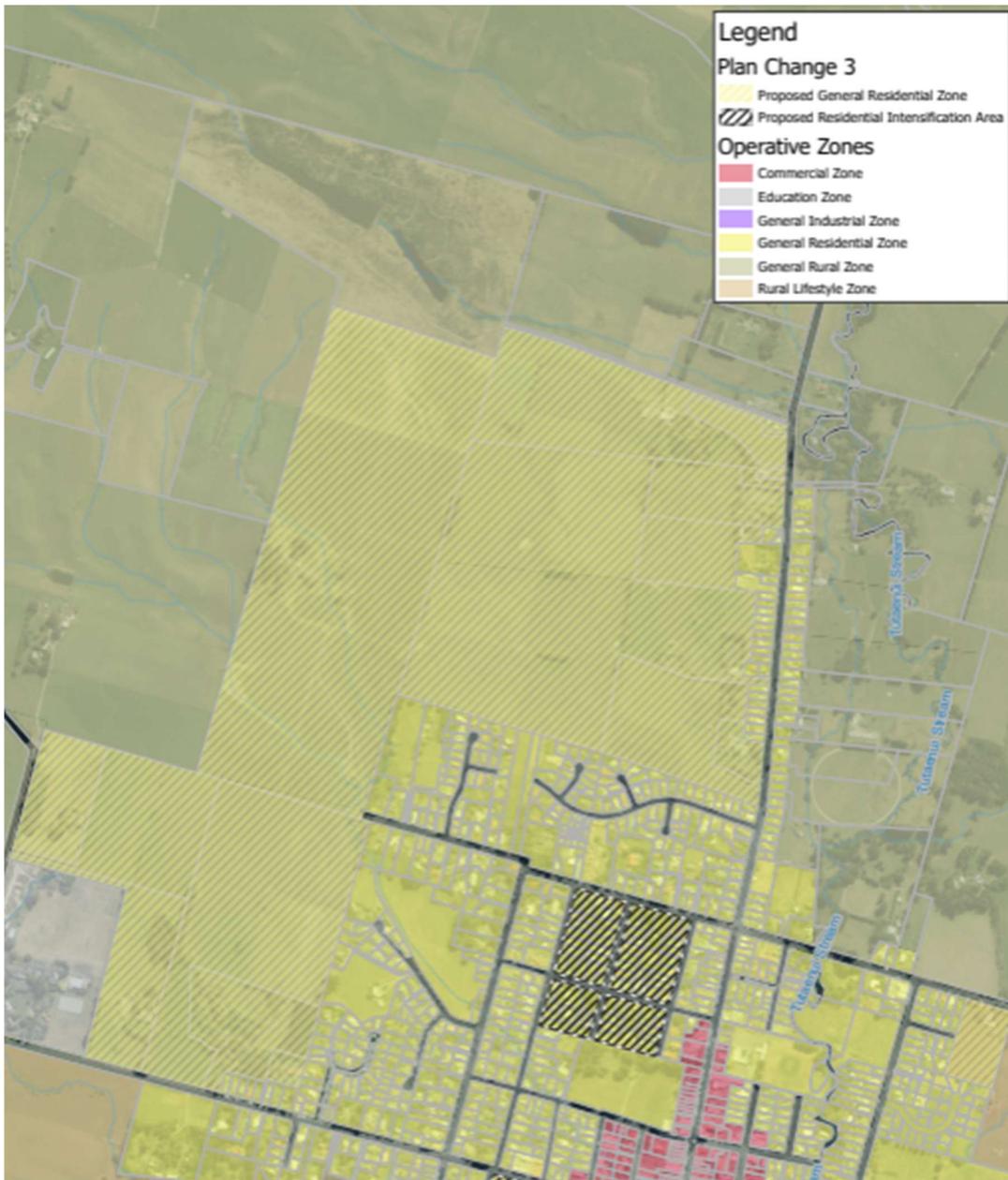


Figure 2. Marton growth areas proposed to be rezoned

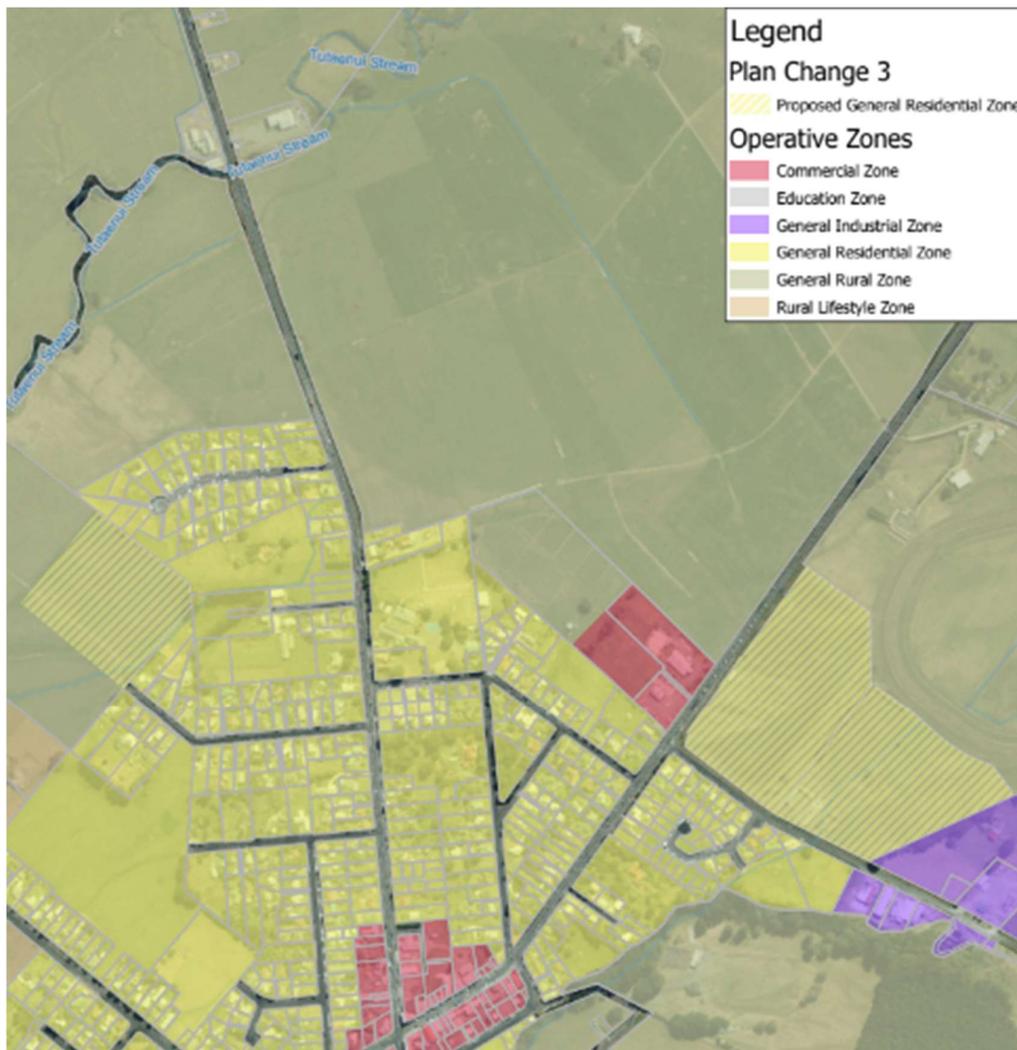


Figure 3: Bulls growth areas proposed to be rezoned

6.2.2 Proposed Structure Plan – Marton North-West Area

The Marton North-West Structure Plan Area (see **Appendix 2**) is proposed to spatially indicate the future development pattern of the area in relation to zoning, road access points, public access, open space and identification of natural hazards.

The structure plan can be connected to the existing roading networks and wraps around the existing urban environment that will enable a well-functioning residential area.

The topography of the area is generally undulating, made up of mix of land holdings (ranging from 1000sqm to a 43ha). There are existing stormwater management earth-dams with culverts, maintained by Horizons Regional Council, these are subject to designations. A mapped active fault line is located within the MAR02 area. The fault line and a 20m buffer zone is included as a fixed point on the structure plan. Any new buildings or building platforms would require resource consent, which allows the risks to be assessed by Council.

6.2.3 Proposed Residential Intensification Area

The Residential Intensification Area (refer to **Appendix 3**) has been developed as part of PPC3. The Residential Intensification Area is a newly introduced overlay proposed to be included on the District Plan Maps.

The Residential Intensification Area will apply to areas of land that are suitable for providing smaller residential lots to better provide for a variety of housing and intensification within the existing urban centres of Marton, Bulls and Taihape.

7 Evaluation of the proposed objectives

Section 32(1)(a) of the RMA requires an evaluation to examine the extent to which the objectives proposed are the most appropriate way to achieve the purpose of the RMA. The level of detail must correspond to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

An examination of the proposed objectives along with reasonable alternatives is included in Table 13 below, with the relative extent of their appropriateness based on an assessment against the following criteria:

- 1 *Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)*
- 2 *Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives e.g. does it clearly state the anticipated outcome?)*
- 3 *Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)*
- 4 *Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)*

While not specifically required under section 32 of the RMA, in some instances alternative objectives are also considered to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

Table 13: Evaluation of proposed objectives

Proposed Objectives
<p>General Residential Zone</p> <p>Objective GRZ-O1: <u>Enable The General Residential Zone has a variety of housing, including papakainga housing, that reflects the aspirations and identity of people and the local communities, while taking into account the local character, amenity values and natural features (e.g. water bodies) within the surrounding environment. achieving good urban amenity and design. This includes the efficient use of existing infrastructure, and integration of pedestrian, cycling and vehicle transportation networks.</u></p>

Objective GRZ-O2: Ensure the efficient and effective provision of infrastructure for development within the General Residential Zone, which is well integrated, resilient, culturally sensitive, and environmentally sustainable.

Objective GRZ-O3: More intense residential development is enabled in locations with good accessibility to local amenities and services and is well designed and integrated with local character.

Objective 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.

Rural Lifestyle Zone

Objective RLZ-O1: Rural lifestyle living is provided for in specified areas. The Rural Lifestyle Zone is used primarily for residential lifestyle within a rural environment on the urban edge of select towns within the district, whilst maintaining the predominant rural character of these areas and providing for other suitable land uses.

Objective RLZ-O2: That rural lifestyle subdivision and development is suitably serviced, and any potential adverse effects associated with the onsite servicing and other infrastructure provision required for these developments are effectively managed.

Objective RLZ-O3: Subdivision and development of land within the Rural Lifestyle Zone facilitates land uses that do not undermine the operation or establishment of activities within adjoining zones where those activities are consistent with the intended purpose of that zone.

Objective RLZ-O4: The subdivision, development, and use of land within the Rural Lifestyle Zone occurs in locations and in a manner that manages natural hazard risks, and does not worsen the adverse effects of any natural hazard on the site, neighbouring properties or the wider surrounding environment.

Alternatives considered

Status quo (Operative District Plan)

General Residential Zone

Objective GRZ-O1: Enable a variety of housing that reflects the aspirations and identity of people and communities while achieving good urban amenity and design. This includes the efficient use of existing infrastructure, and integration of pedestrian, cycling and vehicle transportation networks.

Rural lifestyle Zone

Objective RLZ-O1: Rural lifestyle living is provided for in specified areas.

Appropriateness to Achieve the Purpose of the Act

Appropriateness of Proposed Objectives (relevance, usefulness,

Relevance:

The proposed objectives are directly related to the sustainable management of land use and development within Rangitikei District's

<p>reasonableness, achievability)</p>	<p>urban areas, and therefore are relevant to achieving the purpose of the RMA under section 5. In particular, the objectives:</p> <ul style="list-style-type: none"> • Promote the efficient use and development of natural and physical resources by directing residential growth to already serviced areas or areas with the potential to be serviced, and locations with good access to amenities and infrastructure (section 5(2)(a)). • Enable people and communities to provide for their social, economic, and cultural wellbeing, including housing choice and affordability (section 5(2)(c)). • Avoid or mitigate adverse effects associated with uncoordinated urban expansion, including loss of highly productive land, infrastructure inefficiencies, and reverse sensitivity effects (sections 5(2)(b), 7(b), and 7(c)). <p>The objectives respond to identified deficiencies in the ODP, particularly its limited ability to provide sufficient urban development capacity and manage rural lifestyle demand in a manner consistent with the NPS-UD and the NPS-HPL.</p> <p>Usefulness:</p> <p>The proposed objectives are framed as clear statements of anticipated outcomes, consistent with best practice objective drafting and the National Planning Standards. They provide a stronger framework for decision-making than the status quo by:</p> <ul style="list-style-type: none"> • Clearly articulating the intended form, location, and intensity of residential development, thereby assisting plan users, consent applicants, and decision-makers to understand expected outcomes. • Providing a clear basis for the development of supporting policies and rules that manage density, infrastructure integration, urban design, and land-use compatibility. • Reducing reliance on ad hoc or discretionary decision-making by establishing clear expectations for urban growth and rural lifestyle development. <p>Reasonableness:</p> <p>The proposed objectives strike an appropriate balance between enabling development and managing adverse effects. While the objectives may constrain some development opportunities, these limitations are considered reasonable and proportionate given the identified benefits of:</p> <ul style="list-style-type: none"> • Improved housing choice and supply within existing urban areas. • Support the protection of highly productive land and rural character from fragmentation.
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	<ul style="list-style-type: none"> • The proposed objectives were prepared following engagement with residents and stakeholders who have an interest in the urban areas of Rangitikei. • The proposed objectives seek to improve certainty with respect to urban development outcomes and coordination of urban development. <p>Achievability:</p> <ul style="list-style-type: none"> • The proposed objectives are achievable within the Council’s existing statutory functions, resources, and implementation tools. They can be effectively implemented through the associated zoning framework, policies, rules, and development standards, supported by Council’s infrastructure planning and long-term planning processes. • The objectives align with planned or future infrastructure investment and growth sequencing, reducing implementation risk and supporting coordinated urban development. No new or untested regulatory mechanisms are required to achieve the outcomes sought.
<p>Appropriateness of Status Quo (relevance, usefulness, reasonableness, achievability)</p>	<p>Relevance:</p> <p>The objectives of the ODP are increasingly ineffective in achieving the purpose and principles of the RMA, particularly in relation to the sustainable management of urban growth and the efficient use of land and infrastructure. In particular:</p> <ul style="list-style-type: none"> • The existing General Residential Zone objective does not sufficiently address the need to provide adequate development capacity to meet the anticipated housing demand over the medium to long-term, nor does it promote more efficient urban form. • The existing Rural Lifestyle Zone objective provides minimal direction regarding location, scale, or effects management, and does not adequately respond to the ongoing pressure for rural lifestyle development on the urban fringe. • The status quo objectives provide limited recognition of the need to manage the loss and fragmentation of highly productive land, an issue that has become increasingly significant since the operative provisions were developed. • The objectives were developed prior to the introduction of the NPS-UD and NPS-HPL, and therefore, do not reflect the integrated and forward-looking approach for urban growth. <p>As a result, while the status quo objectives are not inherently inconsistent with the purpose of the Act, they are less effective in promoting the sustainable management of land use in the context of current and anticipated urban growth pressures.</p> <p>Usefulness:</p>

	<p>The usefulness of the existing objectives is limited by their general and non-directive nature. While they express broad intentions for residential and rural lifestyle living, they do not clearly articulate the outcomes sought in relation to:</p> <ul style="list-style-type: none"> • Urban density and housing diversity; • Integration of land use and infrastructure planning; • Protection of rural land from ad hoc residential development; or • Compatibility between rural lifestyle development and adjoining rural or productive land uses. <p>This lack of specificity has reduced their effectiveness as a decision-making framework, contributing to poorer outcomes. For example, an insufficient range of housing.</p> <p>Reasonableness:</p> <p>The status quo objectives are generally well understood by the community and by Council, having been in place for a considerable period. In this respect, they impose few immediate regulatory costs and maintain continuity with established development expectations.</p> <p>However, the relative permissiveness and lack of strategic direction in the existing framework results in longer-term costs and inefficiencies, including:</p> <ul style="list-style-type: none"> • Inefficient infrastructure provision and servicing challenges; • Increased pressure on rural land at the urban edge; • Missed opportunities to support housing supply and affordability within existing urban areas; and • Increased risk of reverse sensitivity effects between residential and rural activities. <p>When considered against the scale and significance of anticipated urban growth, the status quo does not represent the most reasonable approach, as it places an increasing burden on Council and the wider community to manage the consequences of uncoordinated development over time.</p> <p>Achievability:</p> <p>The existing objectives are currently achievable within Council's statutory powers, resources, and implementation mechanisms, as demonstrated by their ongoing application.</p> <p>However, achievability alone does not determine appropriateness under section 32 of the RMA. While the status quo can continue to be implemented, its limited effectiveness in achieving sustainable urban growth outcomes reduces its overall suitability when compared to more targeted and contemporary objective frameworks.</p> <p>In particular, the existing objectives do not provide a strong foundation for implementing national direction or for supporting coordinated growth and infrastructure planning into the future.</p>
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Preferred Option and Reasons
<p>The proposed objectives are the most appropriate means of achieving the purpose of the Act because:</p> <ul style="list-style-type: none"> • They most effectively promote the sustainable management of urban growth within the Rangitikei District. • They respond directly to the identified resource management issues. • Align with higher-order statutory direction, including the Regional Policy Statement, National Planning Standards and the direction of the NPS-UD and NPS-HPL. • Provide a clear implementation framework for managing the environmental, social, economic and cultural effects of urban growth. <p>Compared to the status quo objectives, which are considered less appropriate for achieving the purpose of the Act in the context of projected urban growth within Rangitikei District. While the existing objectives remain broadly relevant and implementable, they do not adequately address identified resource management issues, nor do they provide sufficient guidance to manage the environmental, social, economic, and cultural effects associated with ongoing and future development.</p> <p>Accordingly, retaining the existing objectives would be unlikely to achieve the most effective or efficient outcomes for sustainable urban growth when assessed against the requirements of section 32(1)(a) of the RMA.</p>

8 Evaluation of proposed provisions

Section 32(1)(b) of the RMA requires an evaluation of whether the proposed provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.

The level of detail undertaken for the evaluation of the provisions has been determined by the preceding scale and significance assessment in section 5.0.

The assessment must identify and assess the benefits and costs of environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment under section 32(1)(b) must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

8.1 Evaluation

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5.0 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

Under s32(1)(b)(ii) of the RMA, reasonably practicable options to achieve the objective(s) associated with this proposal need to be identified and examined.

8.1.1 Provisions to achieve objectives relating to Urban Growth

The other options considered reasonably practicable for achieving the proposed PPC3 objectives in relation to urban growth are:

- The proposed provisions (Option 1) – this evaluates the proposed PPC3 package that aims to enable urban growth, including amendments to objectives, policies and rules as well as the Marton North-West Structure Plan Area and the Residential Intensification Area overlay.
- Retaining the status quo (Option 2) – this evaluates the existing ODP provisions relating to urban growth.
- A reasonable alternative (Option 3) – Same as option 1 but expand the spatial extent to include the rezoning of all residential growth areas identified in the Community Spatial Plan.

These options are evaluated in the Table 14 below against achieving the proposed objectives in PPC3 as shown below.

Table 14: Evaluation of the PPC3 options

General Residential Zone

Objective GRZ-O1: The General Residential Zone has a variety of housing, including papakainga housing, that reflects the aspirations of the local communities, while taking into account the local character, amenity values and natural features (e.g. water bodies) within the surrounding environment.

Objective GRZ-O2: Ensure the efficient and effective provision of infrastructure for development within the General Residential Zone, which is well integrated, resilient, culturally sensitive, and environmentally sustainable.

Objective GRZ-O3: More intense residential development is enabled in locations with good accessibility to local amenities and services and is well designed and integrated with local character.

Objective 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.

Rural Lifestyle Zone

Objective RLZ-O1: The Rural Lifestyle Zone is used primarily for residential lifestyle within a rural environment on the urban edge of select towns within the district, whilst maintaining the predominant rural character of these areas and providing for other suitable land uses.

Objective RLZ-O2: That rural lifestyle subdivision and development is suitably serviced, and any potential adverse effects associated with the onsite servicing and other infrastructure provision required for these developments are effectively managed.

Objective RLZ-O3: Subdivision and development of land within the Rural Lifestyle Zone facilitates land uses that do not undermine the operation or establishment of activities within adjoining zones where those activities are consistent with the intended purpose of that zone.

Objective RLZ-O4: The subdivision, development, and use of land within the Rural Lifestyle Zone occurs in locations and in a manner that manages natural hazard risks, and does not worsen the adverse effects of any natural hazard on the site, neighbouring properties or the wider surrounding environment.

Option 1: Proposed approach (recommended)	Costs	Benefits
<p><u>Enabling a greater density of development to accommodate anticipated population growth in the General Residential Zone</u></p> <p>GRZ-P7, SUB-P5 and SUB-P6 enables greater intensification of development of land within central locations in Bulls, Marton, and Taihape to meet the community's needs. This is implemented through a new Residential Intensification Area, a subdivision rule that enables smaller lot sizes and standards in the General Residential Zone .</p> <p>The proposed rule framework allows for greater density development through daylight and building setback provisions being relaxed in the residential standards.</p> <ul style="list-style-type: none"> • GRZ-S2 provides for increased height in relation to building (HIRB). • GRZ-S3 provides for reduced setbacks. • GRZ-S4 provides for greater maximum building coverage. 	<p>Environmental</p> <ul style="list-style-type: none"> • Urbanisation and intensified development may result in localised and cumulative adverse effects such as increased impervious area and stormwater runoff, vegetation loss, changes to townscape/landscape and amenity, and potential effects on ecological features and waterways if not well managed. These effects are typically site/neighbourhood scale but may accumulate over time. • If development proceeds faster than infrastructure upgrades, there is a risk of servicing constraints (e.g. three waters, roading, energy), although structure planning and standards mitigate that risk. <p>Economic</p>	<p>Environmental</p> <ul style="list-style-type: none"> • Provides clear growth locations, improving the ability to avoid ad hoc rural and peri-urban development and to protect rural land resources (including highly productive land) by reducing pressure to “spill” into rural zones. • Structure planning and waterbody setbacks increase the likelihood that development will occur with integrated access, open space, stormwater management and hazard awareness, supporting better environmental outcomes than incremental unplanned growth. • Enabling smaller lot sizes in both the residential and rural lifestyle zones supports greater intensification, better utilisation of limited land

<ul style="list-style-type: none"> GRZ-S5 provides for smaller lot sizes within the Residential Intensification Area. <p>Existing HIRB standard GRZ-S1 inadvertently controlled fence height. The more lenient HIRB means appropriate fence height control is no longer provided, therefore a new fence height standard GRZ-S8 is proposed to ensure control maintains expected outcomes and continues to provide for Crime Prevention Through Environmental Design (CPTED).</p> <p><u>Management of development in the Marton North-West Structure Plan Area to ensure integrated and coordinated development and prevent cul-de-sac development</u></p> <p>GRZ-S9, SUB-P7, SUB-R1 and SUB-S9 require subdivision and development to be in accordance with the structure plan.</p> <p>SUB-P7 specifically requires that development maintains the fixed elements identified on the Structure Plan. Where development does not comply with these fixed points, a Discretionary activity status is applied (SUB-R1.5). The Structure Plan also includes indicative elements, which may be modified; and while this also triggers a Discretionary activity status the policy framework provides guidance to support potential changes for these elements if appropriate. This framework ensures the protection of key access points, the potential for open space, and the safeguarding of development from natural hazards.</p>	<ul style="list-style-type: none"> Some developers/landowners may incur upfront compliance and servicing costs, including meeting structure plan requirements, connecting/upgrade costs where capacity is limited, and design responses to standards (e.g., setbacks). This may be more pronounced in greenfield/edge locations than infill. <p>Social</p> <ul style="list-style-type: none"> Intensification can lead to perceived or actual changes in neighbourhood character and privacy, and increased local traffic/parking demand in certain streets. In small towns where existing town character is valued, these effects can be more noticeable. <p>Cultural</p> <ul style="list-style-type: none"> Some land use change can affect cultural landscapes/values associated with rural environments and waterways, particularly where development interfaces with identified features; however, these effects are generally manageable through setbacks, consenting pathways and ongoing engagement. 	<p>resource, and less expansion over the long term.</p> <p>Economic</p> <ul style="list-style-type: none"> Reduced uncertainty (for landowners, developers, infrastructure providers) and lower transaction costs through more permissive and clearer permitted pathways for infill (fewer “technical breach” consents). Enables a range of housing typologies, supporting a better functioning housing market and helping to maintain competitive land and development markets. <p>Social</p> <ul style="list-style-type: none"> Supports housing choice (including smaller lots and different household types) and a more connected pattern of living near services and amenities, contributing to liveable and accessible towns. Amenity change can occur but is not necessarily adverse where it enables increased housing choice and meets community needs. <p>Cultural</p> <ul style="list-style-type: none"> Provision for additional housing, including papakāinga, enhances Māori ability to provide for housing
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<p>The Structure Plan includes the fault line as a fixed point to ensure development does not occur within this natural hazard. Any proposed development within the fault line buffer area, will have a Discretionary activity status is applied.</p> <p><u>Encouraging rural lifestyle in appropriate locations and protecting highly productive land</u></p> <p>SUB-P12 provides for rural lifestyle subdivision while maintaining the character and densities anticipated within the zone.</p> <p>SUB-S5.5. More enabling minimum lot size for rural lifestyle land around Marton and Bulls as the towns with the highest growth pressures, whilst still avoiding and mitigating potential flood hazards.</p> <p>RLZ-S5 protects the density of the zone by providing a maximum number of residential units permitted per site and provides anticipated infrastructure requirements. This still provides for additional development capacity for Rural Lifestyle sites in comparison to the operative standard.</p> <p><u>Managing existing waterways and wetlands in new growth areas and the Rural Lifestyle Zone:</u></p> <p>As recommended in the Ecology Assessment (Appendix 10) where there are waterbodies identified within the growth areas appropriate setbacks should be provided. The proposed rule framework requires setbacks from waterbodies:</p> <ul style="list-style-type: none"> • GRZ-S2 requires a 5 metre setback from waterbodies. 		<p>needs and cultural connections to whenua within urban environments, supporting well-functioning outcomes that recognise Māori values and aspirations.</p>
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<ul style="list-style-type: none"> RLZ-S1 requires a 15 metre setback from waterbodies. <p><u>Minor amendments to improve clarity and align with current regulations.</u></p> <p>Minor amendments are proposed to GRZ-S3 'Maximum height' to improve clarity of this standard. Amendment of RLZ-S7 for better alignment with National Environmental Standards for Commercial Forestry.</p>		
<p>Effectiveness and efficiency</p>	<p>Option 1 is effective because it directly implements the objectives by (i) enabling incremental intensification where serviced and accessible, (ii) coordinating greenfield growth through structure planning, and (iii) reducing ad hoc rural lifestyle outcomes by clearly signalling appropriate locations and expectations for development. This aligns with best practice plan approaches where clarity and coordination are prioritised.</p> <p>Option 1 is efficient for the nature and amount of anticipated housing demand in the Rangitikei District as it enables capacity and improves regulatory certainty. It provides for future residential growth over the long term horizon, ensuring that as growth demands change over time, sufficient land for future development will be available. The primary efficiency gains arise from reduced transaction/consenting costs for compliant infill and reduced long term servicing inefficiency from uncoordinated development patterns.</p>	
<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as these objectives have been informed through extensive community engagement, and there is a high degree of confidence that they reflect desired community outcomes.</p>	
<p>Overall evaluation</p>	<p>Overall, Option 1 is the most appropriate option to achieve the objectives in the Plan because:</p> <ul style="list-style-type: none"> The proposed provisions provide a proportionate and enabling framework suited to the Rangitikei District. 	

	<ul style="list-style-type: none"> • It enables long term sufficient capacity and housing choice. • Improves certainty and reduces unnecessary consenting costs. • Manages effects through targeted standards and structure planning, without creating the inefficiencies of rezoning more land than demand is likely to need. 					
Option 2: Status Quo	<table border="1"> <thead> <tr> <th>Costs</th> <th>Benefits</th> </tr> </thead> <tbody> <tr> <td> <p><u>Enable development of residential land and meet future growth projections</u></p> <ul style="list-style-type: none"> • Policy SUB-P2 and SUB-P3 provide for infill and greenfield subdivision in the General Residential Zone. • SUB-P5, SUB-P6 and SUB-P7 help to protect the General Rural Zone from inappropriate residential development and protects highly productive land. • No new growth areas would be identified. <p><u>Integrated and coordinated development</u></p> <ul style="list-style-type: none"> • There are no existing structure plans for future growth areas. • There are no requirements for coordinated development within the ODP. <p><u>Rural lifestyle development and the protection of highly productive land</u></p> <ul style="list-style-type: none"> • Rural lifestyle development within the Rural Lifestyle Zone would remain </td> <td> <p>Environmental</p> <ul style="list-style-type: none"> • The principal environmental cost is the continuation of incremental, ad hoc patterns of subdivision and development where the plan provides insufficient direction or capacity in appropriate urban locations, increasing pressure on rural edges and potentially on highly productive land over time. • Without a targeted structure planning approach for new growth areas, there is increased risk that connectivity, stormwater outcomes and hazard constraints are not addressed as comprehensively at subdivision stage (requiring later retrofit). <p>Economic</p> <ul style="list-style-type: none"> • Ongoing costs from regulatory inefficiency, including continued reliance on resource consents for minor breaches and uncertainty for developers/landowners. These transaction costs can be a meaningful </td> </tr> <tr> <td> <p>Environmental</p> <ul style="list-style-type: none"> • Retains the established pattern of residential character and may reduce the rate of change in some neighbourhoods in the short term. <p>Economic</p> <ul style="list-style-type: none"> • As the provisions are familiar, there will be no time cost to users and Council consenting teams to build familiarity with new provisions. • Certainty for developers and landowners with continuation of existing permitted rights. <p>Social</p> <ul style="list-style-type: none"> • These provisions have provided opportunity for some diversity in housing choice. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect costs have been identified. </td> </tr> </tbody> </table>	Costs	Benefits	<p><u>Enable development of residential land and meet future growth projections</u></p> <ul style="list-style-type: none"> • Policy SUB-P2 and SUB-P3 provide for infill and greenfield subdivision in the General Residential Zone. • SUB-P5, SUB-P6 and SUB-P7 help to protect the General Rural Zone from inappropriate residential development and protects highly productive land. • No new growth areas would be identified. <p><u>Integrated and coordinated development</u></p> <ul style="list-style-type: none"> • There are no existing structure plans for future growth areas. • There are no requirements for coordinated development within the ODP. <p><u>Rural lifestyle development and the protection of highly productive land</u></p> <ul style="list-style-type: none"> • Rural lifestyle development within the Rural Lifestyle Zone would remain 	<p>Environmental</p> <ul style="list-style-type: none"> • The principal environmental cost is the continuation of incremental, ad hoc patterns of subdivision and development where the plan provides insufficient direction or capacity in appropriate urban locations, increasing pressure on rural edges and potentially on highly productive land over time. • Without a targeted structure planning approach for new growth areas, there is increased risk that connectivity, stormwater outcomes and hazard constraints are not addressed as comprehensively at subdivision stage (requiring later retrofit). <p>Economic</p> <ul style="list-style-type: none"> • Ongoing costs from regulatory inefficiency, including continued reliance on resource consents for minor breaches and uncertainty for developers/landowners. These transaction costs can be a meaningful 	<p>Environmental</p> <ul style="list-style-type: none"> • Retains the established pattern of residential character and may reduce the rate of change in some neighbourhoods in the short term. <p>Economic</p> <ul style="list-style-type: none"> • As the provisions are familiar, there will be no time cost to users and Council consenting teams to build familiarity with new provisions. • Certainty for developers and landowners with continuation of existing permitted rights. <p>Social</p> <ul style="list-style-type: none"> • These provisions have provided opportunity for some diversity in housing choice. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect costs have been identified.
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<p>limited due to a lot size (i.e. blanket 2ha minimum) that is not providing sufficient opportunity for development.</p>	<p>barrier to small-scale incremental development.</p> <ul style="list-style-type: none"> • Inefficient infrastructure outcomes can arise where development occurs out of sequence or in less serviceable locations, increasing lifecycle costs borne by the Council/community. • Does not meet the medium and long-term land capacity and supply for housing. <p>Social</p> <ul style="list-style-type: none"> • Reduced housing choice and limited feasible capacity in preferred locations may constrain households seeking smaller lots or different typologies (including ageing households), undermining social wellbeing even if overall demand is low. <p>Cultural</p> <ul style="list-style-type: none"> • Less enabling housing provisions mean Māori housing opportunities may be more constrained, limiting the ability to provide for cultural wellbeing through housing on whenua or in appropriate urban contexts. 	
<p>Effectiveness and efficiency</p>	<p>Option 2 is less effective at achieving the proposed objectives because it provides limited mechanisms to enable sufficient development capacity in accessible/serviced locations. This increases the chance of ad hoc outcomes rather than coordinated growth and housing choice.</p>	

	Also, while the status quo minimises short-term transition costs, it is less efficient over time due to continued consenting/transaction costs for modest development and increased risk of infrastructure inefficiency from unplanned or poorly sequenced development.	
Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions	It is considered that there is certain and sufficient information on which to assess the status quo provisions as they have been in place for a long time, their adequacy has been canvassed through use over time and community engagement.	
Overall evaluation	Option 2 is not the most appropriate way to achieve the proposed objectives because, while familiar, it is comparatively inefficient and less effective in enabling housing choice and sufficient capacity in appropriate locations, and it increases the risk that growth (where it occurs) will continue in a less coordinated and less infrastructure efficient manner.	
Option 3: Alternative approach to provisions	Cost	Benefit
<p>Same as option 1 but expand the spatial extent to include the rezoning of all residential growth areas identified under the Community Spatial Plan.</p> <p>This would include more growth areas than have been identified under PPC3 including in additional towns/settlements such as Hunterville and Mangaweka.</p>	<p>Environmental</p> <ul style="list-style-type: none"> Greater spatial rezoning increases the likelihood of unnecessary loss/fragmentation of rural land resources (including potentially highly productive land) and increases exposure to hazard constraints in discounted locations. In low-demand contexts, over-zoning can create “latent” capacity that is never developed but still creates long-term pressure on rural values and expectations. Additional growth areas widen the geographic footprint over which stormwater, ecology, and landscape 	<p>Same as option 1, but in relation to the additional growth areas:</p> <p>Environmental / Economic</p> <ul style="list-style-type: none"> Could provide longer-term theoretical capacity and reduce the need for future rezonings; however, in a low demand market, this benefit is diminished because surplus capacity may not translate into delivered housing and may instead generate inefficiency. <p>Social</p> <ul style="list-style-type: none"> Limited additional social benefit beyond Option 1, because additional greenfield capacity does not necessarily improve housing choice

	<p>effects must be managed, increasing cumulative risk and monitoring/implementation burden.</p> <p>Economic</p> <ul style="list-style-type: none"> • Rezoning extensively more land than proposed in Option 1 may reduce efficiency by increasing the likelihood of premature servicing expectations, higher lifecycle infrastructure costs, and dispersed investment. It can also encourage land banking/speculation rather than timely development, particularly in weaker housing markets. • Greater roading and infrastructure network upgrades may be required across a broader set of sites, increasing total cost and uncertainty. <p>Social</p> <ul style="list-style-type: none"> • More dispersed growth areas can reduce accessibility to centres/services and weaken compact settlement form outcomes, increasing car reliance and potentially reducing community cohesion relative to a more focused growth pattern. <p>Cultural</p> <ul style="list-style-type: none"> • Expanded rezoning increases the risk of affecting cultural landscapes/values across a wider area and increases the need for engagement and cultural 	<p>or affordability where market demand is weak and development is not taken up.</p> <p>Cultural</p> <ul style="list-style-type: none"> • No additional direct or indirect benefits have been identified.
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	impact consideration at a broader scale.	
Effectiveness and efficiency	<p>While Option 3 could technically achieve capacity-related aspects of the objectives, it is less effective overall because it spreads the urban growth response across more areas and more towns/settlements than necessary, reducing the ability to coordinate, prioritise and stage infrastructure investment and manage effects in a targeted way.</p> <p>Option 3 is less efficient in a low demand context because it increases the risk of over zoning relative to realistic uptake, which can drive dispersed infrastructure planning, higher lifecycle costs, and weaker sequencing outcomes.</p>	
Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions	<p>It is considered that there is not certain and sufficient information on which to base the additional growth areas on as they have not been through further engagement and may include locations with known constraints (e.g. hazards, access, servicing) that require extensive further investigation.</p>	
Overall evaluation	<p>Option 3 is not preferred because it is disproportionate to likely demand and introduces higher infrastructure, environmental and implementation risk. While it may reduce the need for future plan changes, the increased costs and risks associated with premature and wider rezoning are not justified relative to the potential marginal benefits over Option 1.</p>	

9 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposed provisions, having regard to their effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

The evaluation demonstrates that this proposal is the most appropriate option as it:

- Gives effect to best practice undertaken by other councils, and national direction from the RMA, national policy statements and regional policy statement;
- Proposes changes that provide for adequate land to meet Rangitikei District's medium and long term growth demands. The changes focus on enabling land for future urban growth which is supported through the objective and policy framework;
- Proposes objectives, policies and rules that provide direction and certainty to plan users on the outcomes anticipated for urban growth and development within the district including growth within the Marton North-West Structure Plan area. There is a focus on reinforcing the role, function and character of the structure plan area to ensure that any activities that have the potential to impact the structure plan are appropriately managed;
- Proposes a rule framework that provides for the management of activities in accordance with the structure plan. Additionally, the rule framework provides for appropriate discretion in relation to activities not anticipated within the structure plan area. This provides for the management of adverse effects associated with these activities, including reverse sensitivity effects;
- Enables greater housing variety and intensive development within the town centres of Bulls, Marton and Taihape through the introduction of the Residential Intensification Area; and
- Aims to release land to provide for projected growth while minimizing growth on highly productive land. As well as providing for more intensive development within the existing urban areas and increasing the development capacity of the existing Rural Lifestyle Zone in Bulls and Marton to help reduce ad hoc rural lifestyle subdivision in the General Rural Zone.

Overall, the proposed provisions are evaluated as being the most appropriate means of achieving the sustainable management purpose of the RMA, and achieving the proposed objectives, when considered against the other reasonable alternatives.