

Before a Hearings Panel appointed by Manawatū District Council

In the matter of the Resource Management Act 1991 (**RMA**)

And

In the matter of a request by Te Kapiti Trust to change the Manawatū District Plan
under clause 21 of Schedule 1 of the RMA (Private Plan Change 1)

Statement of evidence by Kim Sarah Anstey on Planning Matters on behalf of the applicant

Dated 11 May 2023

Introduction

1. My full name is **Kim Sarah Anstey**. I am a Senior Planner at The Property Group, Napier.
2. I have the following qualifications and experience relevant to my evidence:
 - (a) I hold the qualifications of Bachelor of Arts in Environmental Studies and Master of Arts in Sociology.
 - (b) My planning experience includes policy positions at Napier City Council and Hawke's Bay Regional Council. I have been involved in District and Regional Plan policy processes as well as resource consent applications and policy work across the central North Island since joining The Property Group in early 2022
 - (c) I am a member of the New Zealand Planning Institute.
3. I have been engaged by Te Kapiti Trust (**Applicant**) to provide planning advice in relation to the request to change the Manawatu District Plan to enable residential rezoning of land at Rongotea, known as Private Plan Change 1 (**PC1**). I was the lead planner involved with consultation, preparation, and lodgement of the Plan Change request.

4. In preparing this statement of evidence I have read the section 42A report prepared by Daniel Batley, the reporting officer for Manawatū District Council (**MDC**); the submissions and further submission on PC1; the evidence prepared by other witnesses for the Applicants and the relevant provisions of Manawatū District Plan, Horizons One Plan, National Policy Statements and Strategic Documents.
5. I am familiar with the application site and environs having visited the site on numerous occasions.

Code of Conduct

6. I confirm that I have read the Expert Witnesses Code of Conduct contained in the Environment Court of New Zealand Practice Note 2023. My evidence has been prepared in compliance with that Code in the same way as I would if giving evidence in the Environment Court. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Summary of Evidence

7. My evidence addresses the planning aspects of PC1 and responds to the issues identified in the s 42A Report as remaining outstanding (broadly relating to the application of the National Policy Statement on Highly Productive Land (NPS-HPL). Similar issues have been raised by the Panel in the minutes preceding the hearing.
8. For the purposes of brevity, and because they are not in contention as between the Applicant and the Council, I do not repeat matters that I consider have been adequately addressed in the section 42A report. Similarly, I will refer to the contents of my report and other expert reports which formed part of the plan change request, where appropriate.

Scope

9. The scope of my statement of evidence is:
 - (a) Context and background (Page 3)

- (b) An overview of PC1 including how it fits within the Manawatū District Plan and its approach to stormwater management (Page 5)
- (c) An overview of the statutory provisions (Page 7)
- (d) Section 32 Evaluation (Page 11)
- (e) Strategic Analysis, including an assessment under the NPS-HPL 3.6(4) and 3.6(5) (Page 12)
- (f) Assessment of environmental effects (Page 25)
- (g) Comment on S42A Report (Page 26)
- (h) Conclusion (Page 28)

A. Context and Background

10. The Plan Change Application Report and s32 Evaluation provides a comprehensive description of the site, its surroundings and current planning provisions. In summary:

Site Description

- (a) The site comprises 31ha of land in two titles. One title is 21ha with access from Banks Road and Trent Street, and a second title is 10ha with access from Sterling Lane.
- (b) The site is undeveloped and largely maintained in pasture. There is no built development on the site.
- (c) In terms of topography, the 21ha title (proposed to be rezoned Village Zone) is predominantly flat in the east and slopes down to accommodate the Ruivaldts Drain running north-south across the western end prior to converging with Campbells Drain that exits the land in the south. A shelter belt of exotic trees exists on the eastern part of the site but otherwise the site is devoid of any significant vegetation.
- (d) The 10ha parcel of land to the south is of an undulating nature with an additional shelter belt area to the south. This area is of lower topography and contains the Campbells Drain. A soils assessment and ecological survey

undertaken as part of this plan change note the presence of peaty soils that indicates a history of wetland vegetation occupancy in this area, prior to the existing agricultural use. A small amount of wetland vegetation remains in pockets.

Surrounding Locality

- (e) The Plan Change area is located at a mixed zoning interface. Rongotea is to the north and is zoned Village Zone. It is made up of predominantly single storey dwellings on sites of 750m² to 1000m².
- (f) The surrounding rural area is Rural 2 Zone with a rural lifestyle nodal overlay. Newly developed sites to the south are predominately rural lifestyle and range in size from 4000m² to 5000m².
- (g) The Rongotea Village Square is located approximately 315m north of the subject land. The nearest state highway is SH1 which is located approximately 5.5km to the west. Feilding is located 17km to the north east and Palmerston North is located 18.5 km to the south east.

Pre-lodgement Meetings with Council and Horizon's Regional Council

- (h) The plan change has been subject to a pre-application process with Council staff and Horizon's Regional Council. Pre-application meetings were held with MDC planners in March 2022 with a wider Council team including planners, development, and transport engineers in June 2022.
- (i) A meeting with Horizon's and MDC planners was held on May 2022 and a further meeting was held in October 2022. Feedback on these meetings was used to advance and formulate the lodgement of PC1, and further refine it during the further information stage. Details on the meetings held with the Councils are outlined in the Application Report.

Consultation & Engagement

- (j) Consultation has been undertaken with Rongotea residents via the Rongotea Community Committee and via letter delivered to all properties that share a boundary with the plan change site. Details of all consultation undertaken in preparing the plan change is included in the Application Report.
- (k) Early engagement was undertaken with all hapū groups who have an interest in the Plan Change area. Rāngitane o Manawatū expressed an interest in being further involved in the process and the development of the provisions. A meeting was held in June 2022 and a recommendation memo was provided in July 2022 which was included with the application.
- (l) Ngāti Raukawa, Ngāti Kauwhata and Ngā Wairiki Ngāti Apa have been contacted on numerous occasions prior to lodgement and email updates are ongoing. To date no response has been provided. A copy of these emails can be provided to the panel on request.

B: Overview of the Plan Change

- 11. The plan change is to the Manawatū District Plan, to rezone 21.88 ha of land from Rural 2 Zone to Village Zone. An adjacent 10.48 ha is to remain as Rural 2 Zone and the Rongotea South Structure Plan will apply across the area as a spatial layer to guide subdivision and development. The provisions will be contained within a new District Plan Chapter titled Rongotea South Development Area. Consideration has been given to the National Planning Standards as well as maintaining the existing drafting style of the operative Manawatū District Plan.
- 12. The provisions proposed by PC1 provide for subdivision of Village Zoned land within the Rongotea South Development Area as a Restricted Discretionary Activity subject to eight performance standards. Subdivision that does not meet all performance standards is a Discretionary Activity. There are nine matters of discretion. The particular matters that need to be addressed are:
 - Consistency with the Rongotea South Structure Plan
 - Density in accordance with the variation of lot sizes in the Structure Plan
 - Building platforms at or above predicted flood level for a 0.5% (AEP) (1 in 200 year) flood event

- A comprehensive development plan that demonstrates (amongst other matters) the final roading layout, open space reserve areas and location of the stormwater treatment and attenuation pond to be vested with Council
 - A stormwater management plan
 - An infrastructure servicing standard that states Council infrastructure must be available and of sufficient capacity before subdivision occurs.
13. With regard to stormwater management within the plan change area, this was discussed at length with Council and Horizon's staff during the pre application and further information stages. In response to concern raised on the original proposed location of the stormwater treatment and attenuation pond (Option A) being within the vicinity of the natural inland wetland identified as part of this plan change process, an alternative location was developed and tested for feasibility (Option B).
14. Amendments were made to the Structure Plan and provisions to remove all references to a particular location for the stormwater treatment wetland. A new matter of discretion was included as follows:
- MD08: The location of the stormwater attenuation pond with respect to the location of the natural wetland.
- In addition, standard DEV1-S8 requires a stormwater management plan to be submitted at the time of subdivision consent that includes (amongst other requirements) details of:
- DEV-S8 e: how the proposed stormwater management approach recognises the Ruivaldts and Campbell waterways and their margins and the natural wetland as a sensitive receiving environment where natural, public access and mana whenua values must be recognised and provided for;
15. At the request of the panel, the Stormwater Engineers and the Planners undertook witness conferencing and Joint Witness Statements arising from those conferences have been completed. These confirm that all experts are comfortable that, subject to the further consenting and detailed design required by PC1, an appropriate

stormwater treatment pond could feasibly be constructed within the plan change area and that no further changes to the plan change provisions were required.

C: Statutory Provisions

16. As a private plan change, PC1 is governed by Schedule 1 to the RMA. The plan change request was made pursuant to clause 21(1) of Schedule 1. Council accepted the plan change request and PC1 was publicly notified pursuant to clause 26.6.
17. Under clause 29(1) of Schedule 1, Part 1 of Schedule 1 (which applies to Council initiated or adopted plan changes) applies with all necessary modifications. This includes provisions for the making of submissions, decisions, and appeals.
18. Other provisions of the RMA, including sections 31, 32, 72, 74 and 75, and Part 2 of the RMA, including the purpose and principles of the RMA, apply to all changes to a district plan, regardless of whether it is a Council-initiated or adopted change or an accepted private plan change request.

Section 31

19. Under section 31(1) RMA, Council as a territorial authority has a number of functions for the purpose of giving effect to the RMA in its district, including 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 of the district.
20. Section 31(1)(aa) is particularly relevant to PC1 in that it requires:

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.
21. I discuss this further below in relation to the NPS-HPL's criteria for rezoning highly productive land.

Section 32

22. Under clause 22(1) of Schedule 1, a private plan change request must "*contain an evaluation report prepared in accordance with section 32 for the proposed plan change*". This is addressed under the "Section 32 Evaluation" section below.

Section 74

23. Section 74 outlines the matters which must be considered by Council when changing its operative district plan.
24. Council must change its operative district plan "in accordance with", among other things, its functions under section 31 above, the provisions of Part 2, its obligation to have particular regard to the section 32 analysis discussed above, and any national policy statements or national planning standards.
25. Under section 74, the Council must "have regard to", among other things, any proposed regional policy statements or proposed regional plans, management plans and strategies prepared under other Acts, and the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.
26. Since PC1 was lodged two new requirements were inserted into s74(2) that require territorial authorities, when preparing or changing a district plan, to have regard to:
- (d) any emissions reduction plan made in accordance with section 5ZJ of the Climate Change Response Act 2002; and
 - (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.
27. The documents referred to are:
- (a) Te hau mārohi ki anamata, Towards a productive, sustainable and inclusive economy – Aotearoa New Zealand’s First Emissions Reduction Plan, available [here](#); and
 - (b) Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi, Adapt and thrive: Building a climate-resilient New Zealand, Aotearoa New Zealand’s First National Adaptation Plan, available [here](#).

28. Having reviewed and considered the relevant parts of these documents, I do not consider PC1 to be inconsistent with their direction.
29. In terms of the National Emissions Reduction Plan, this document is the impetus for improvements to be made in the building, transport, energy and waste sectors that will potentially be realised in future development within the plan change area.
30. While climate change issues and adaptation responses are wide reaching, it is relevant to note that the site is not subject to coastal hazards or to any land instability issues that are experienced in other areas of the Manawatū District. I therefore consider PC1 to be consistent with the indication in the Adaptation Plan that Councils should “avoid locking in inappropriate land use or closing off adaptation pathways”.
31. Other relevant plans and strategies are addressed in the following sections below under the “Strategic Analysis” heading.

Section 75

32. In addition to setting out what the operative district plan must and may state, s75(3) provides that the District Plan must "give effect to"
 - (a) any national policy statement;
 - (b) a national planning standard; and
 - (c) any regional policy statement.
33. The relevant national policy statements are the NPS-HPL, the National Policy Statement for Urban Development 2020 (**NPS-UD**) and the National Policy Statement for Freshwater Management 2020 (**NPS-FM**).
34. The relevant regional policy statement is the Horizon’s One Plan.
35. The Manawatū District Plan must not be inconsistent with a regional plan for any matter specified in s 30(1) of the RMA, which relates to the functions of regional councils under the RMA.

Part 2 - Purpose and Principles

36. For the reasons discussed later in my evidence, in terms of consistency with relevant National Policy Statements, and generally, in my opinion, PC1 is consistent with the purpose of the RMA. The plan change has been informed by a wide ranging technical review that has identified the key natural and physical resources of the site and the surrounding environment. The provisions have been designed accordingly to deliver social and economic wellbeing while protecting important environmental values and respecting any cultural associations with the site. The objectives, alongside the existing objectives of the Village Zone, are intended to provide a framework for development and use of the site that will facilitate integration between adjoining sites and that will avoid potentially wider adverse effects regarding wastewater, ecological values, stormwater and the transport network.
37. At the same time, PC1 seeks to address the matters in s5 as follows:
- (a) It seeks to ensure that the land resource is developed in a manner that achieves its potential to accommodate its share of projected growth and in particular contributes to providing for anticipated population growth in rural areas within the Manawatū District, relieving pressure for other types of growth that are considered less appropriate (such as lifestyle development on productive land), thereby safeguarding the needs of future generations.
 - (b) It seeks to safeguard the life supporting capacity of water by ensuring that provisions relating to the safe and efficient establishment and operation of wastewater and stormwater infrastructure apply at the time of subdivision and development. Protections are also afforded to the natural inland wetland within the site.
 - (c) Adverse effects of urban activities on the environment will be avoided, remedied or mitigated through the PC1 provisions and the application of existing Manawatū District Plan rules.
38. PC1 recognises and provides for the relevant Section 6 matters of national importance through the following methods:
- (a) There are no identified areas of high or outstanding natural character, coastal environment, outstanding natural features and landscapes, identified historic

heritage or significant natural areas (SNA's) as mapped by the Council. The wetland and watercourses requiring protection are recognised and provided for in the Structure Plan. From a natural character and landscapes perspective, this makes the land ideal for further urban development.

- (b) The Applicant has recognised and provided for the relationship of mana whenua and their culture and traditions relating to the Rongotea area. Specifically, Rāngitane o Manawatū acted in an advisory role to ensure development objectives aligned with their cultural objectives for Te Mana o Te Wai. The provisions include a requirement for future mana whenua input into design of the stormwater management and open space areas at subdivision stage.

D: Section 32 Evaluation

39. Section 32 of the RMA requires that an evaluation report, required under clause 22 of Schedule 1, must examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA under subsection (1)(a), and whether the provisions in the proposal (i.e. policies, rules and other methods) are the most appropriate way of achieving the objectives under subsection (1)(b).
40. The evaluation must also consider the efficiency and effectiveness of a proposal, taking into consideration benefits and costs and the risk of acting or not acting. At the time of lodgement of PC1, an assessment of alternatives, costs and benefits in accordance with these provisions of the Act was provided in the original s32 Report.
41. As noted above, since the plan change request was made, the NPS-HPL was introduced and now applies to PC1. To address relevant matters arising under the NPS-HPL, the s32 has been updated and is included as **Appendix A**. The updated s32 considers the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA, with regard to the purpose of NPS-HPL developed under the Act, which seeks to manage highly productive soils as finite resource. It considers the NPS-HPL under the Plan Change 1 (option 3) to address the cost/benefit analysis requirements of 3.6(4)(c).

42. In summary, I consider that the Rongotea South Development Area chapter introduced by PC1 and the existing provisions provided by the underlying Village Zone are the most appropriate way to achieve the purpose of the RMA because:
- (a) The extension of the Village Zone at Rongotea will provide opportunities for medium and large lot residential development in keeping with the existing Village character and close to shops, community and education facilities.
 - (b) The proposed Rongotea South Development Area provisions applying to the site ensure that future residential development:
 - i. Is integrated with existing development that adjoins the site
 - ii. Will be connected to the surrounding transport network for pedestrians, cycling and motorised vehicles
 - iii. Protects the existing streams and wetland area and water quality overall
 - iv. Provides new recreational opportunities for the community of Rongotea

E: Strategic Assessment

NPS-HPL

43. The NPS-HPL was notified in September 2022 and became operative on 17 October 2022, after the request for the plan change was made in August 2022.
44. The Applicant's legal advice is that the NPS-HPL does not apply to the land affected by PPC1. While the Applicant maintains that position, it has nevertheless committed to assessing the plan change as if the NPS-HPL did apply. This section of my evidence addresses the situation if the NPS-HPL is considered applicable.
45. The NPS-HPL contains one overriding objective and several policies, which are then implemented by the clauses in Part 3, in a non-limiting way. The most directly relevant in this case are the following:

Objective: Highly productive land is protected for use in land-based primary production, both now and for future generations.

Policy 1: Highly productive land is recognised as a resource with finite characteristics and longterm values for land-based primary production.

Policy 5: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.

46. The interim definition of highly productive land (HPL) which applies until the Regional Council has completed the required mapping. Clause 3.5(7) provides:

Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that, at the commencement date:

(a) is:

- (i) zoned general rural or rural production; and
- (ii) LUC 1, 2, or 3 land; but

(b) is not:

- (i) identified for future urban development; or
- (ii) subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.

47. Notwithstanding the legal argument that this interim definition does not apply to the site, the following paragraphs are an assessment as if the site were HPL under this definition.

48. I have had specific regard to Policy 5 of the NPS-HPL that provides a pathway for urban rezoning on HPL under certain circumstances, and providing certain tests are met. Those tests are set out in cl 3.6. As Manawātū District Council is a tier 3 authority, the relevant provisions are as follows:

(4) Territorial authorities that are not tier 1 or 2 may allow urban rezoning of highly productive land only if:

- (a) the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and
- (b) there are no other reasonably practicable and feasible options for providing the required development capacity; and
- (c) the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based

primary production, taking into account both tangible and intangible values.

- (5) 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.

49. While the earlier parts of the clause, which relate to tier 1 and 2 authorities, refer specifically to the National Policy Statement on Urban Development 2020 (**NPS-UD**), I note that the NPS-UD is still relevant under clauses 4 and 5. This is because the NPS-HPL provides that *“Terms defined in the National Policy Statement on Urban Development 2020 and used in this National Policy Statement have the meanings in the National Policy Statement on Urban Development 2020, unless otherwise specified”*. Terms used in clauses 3.6(4) and (5) that are used in the NPS-UD are:

- (a) Sufficient development capacity;
- (b) Expected demand for housing; and
- (c) Well functioning urban environment.

50. These are discussed below where relevant. There is therefore a close relationship between the Council’s obligations under the NPS-HPL and its obligations under the NPS-UD, the latter of which reflects its obligations under section 31(1)(aa) of the RMA to provide for sufficient development capacity to meet expected demand.

51. Manawatū District Council is a tier 3 local authority and Feilding is considered an ‘urban environment’ for the purpose of the NPS-UD. The NPS-UD places certain direct obligations on the Council, and “strongly encourages” it to (cl 1.5(1)):

...do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3 of this National Policy Statement, adopting whatever modifications to the National Policy Statement are necessary or helpful to enable them to do so.

52. Manawatū District Council does not currently have a district wide growth strategy. However, in accordance with the NPS-UD’s focus on ‘urban environments’ there has been work done to understand the demand for dwellings within Feilding. As a

result of that work, land was rezoned Residential Zone in 2019 to meet identified demand. This area is known as Precent 4.

53. I note in the evidence provided by Mr Mackay to support the s42A report that preparation for a district wide growth strategy for the Manawatū District is currently underway and the inclusion of the district's villages will be a key aspect of the strategy.¹
54. With those points in mind, the following paragraphs step through the process we have undertaken to assess the plan change against the tests of Clause 3.6(4) (a), (b) and (c) and 3.6(5)

3.6 (4) (a) The urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district

55. The Applicant engaged Ruth Allen, a planner with urban growth policy expertise, to undertake a detailed assessment of expected demand and existing development capacity within the district. Ms Allen's report is included with her evidence.
56. As noted above, the term "sufficient development capacity" is defined in the NPS-UD in cl 3.2(2) which states:

In order to be sufficient to meet expected demand for housing, the development capacity must be:

- (a) plan-enabled (see clause 3.4(1)); and
- (b) infrastructure-ready (see clause 3.4(3)); and
- (c) feasible and reasonably expected to be realised (see clause 3.26); and
- (d) for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (see clause 3.22).

57. There are different requirements within the NPS-HPL for tier 1 and 2 local authorities compared with tier 3 authorities in ascertaining that the plan change is required to meet 'sufficient development capacity'. For tier 3 Councils, the capacity has to be assessed against 'expected demand' whereas for tier 1 and 2

¹ Appendix H Strategic Direction Memorandum S42A Report

Councils, the requirement is to demonstrate that the proposed development is required to meet the prescriptive growth plans required under the NPS-UD. This is reflective of the detailed urban growth planning required for high density urban growth areas.

58. In terms of 'expected demand' Ms Allen's evidence and that of Mr McKay on behalf of Council illustrate that the demand for housing within the district is clearly divided between the urban centre of Feilding, and the wider rural area that contains the Manawatū villages and their surrounding nodal areas for lifestyle development.² This is reflected in the Council's Long Term Plan which records (at p79):

...based on past growth, infrastructure capacity, regional and central policy and likely plan changes ..., it is projected that approximately 60% of that growth will occur in Feilding, while the remainder will occur in rural and village areas.

59. With respect to this pattern of demand for development, is important to consider that the NPS-HPL seeks to 'avoid' lifestyle subdivision on highly productive land, with developers having to meet stringent tests to demonstrate a site has permanent or long term constraints that make it uneconomic for primary production over at least the next 30 years (clause 3.10). In comparison, there is a pathway for 'urban' rezoning when it is required to meet expected demand (Clause 3.6).
60. If the Panel accept the Council's legal opinion that the nearest equivalent zone to the Rural 2 Zone with nodal overlay is in fact a Rural Zone, the current pattern of lifestyle rural residential development within the Rural Zones would be severely compromised, essentially meaning lifestyle subdivision will no longer be able to proceed as it has in the past, in nodal areas. However, the demand for rural and village living will remain, and it is important to consider how that demand can be met.
61. In the absence of a District wide growth plan, it is apparent that development patterns have been ad hoc within the Manawatū District's Rural Zones with large

² Evidence of Ruth Ellen, Appendix H, Strategic Direction Memo s42A

amounts of rural subdivision occurring on highly productive soils. As highlighted in the evidence of Mr Mackay, there is now a need to provide for planned growth with respect to the requirements of the NPS-HPL.

62. In this respect, it is important to note that the NPS-HPL, and its interaction with the NPS-UD, make it clear that well planned urban growth on the urban edge and on highly productive land will generally be preferred over sporadic development on highly productive or non-highly productive land.
63. The rural/urban pattern of development is well established in the Manawatū District and the District plan makes a key distinction between these separate types of development for Feilding urban and the rural villages.
64. To conclude, the evidence provided by Ms Allen and by Mr Mackay for Council demonstrate that the rezoning proposed through PC1 will contribute to required development capacity to meet the expected demand across the district and therefore the test under 3.6 (4)(a) is met by PC1.

3.6 (4) (b) There are no other reasonably practicable and feasible options for providing the required development capacity.

65. In terms of what is to be considered ‘reasonably practicable and feasible’, I have had regard to the s32 evaluation report for the NPS-HPL as to what this is intended to cover.³ That report indicates that regard should be had to factors such as constraints (eg, hazards, natural geographic boundaries) and issues (eg, sensitive or high value receiving environments) in determining whether other options are practicable.
66. There is also the obvious requirement that any proposed urban zone would need to be in an area able to connect to existing reticulated services for wastewater and water supply and have sufficient land area to manage stormwater on site to achieve hydraulic neutrality. With regard to connectivity, the area needs to be in close proximity to local employment hubs and existing community facilities.

³ [NPS Highly Productive Land: Evaluation under section 32 of the Resource Management Act, 22 September 2022 /](#)

67. The s32 report indicates that the reference to alternatives being “feasible” is intended to align with the NPS-UD. For development capacity to be feasible (i.e., commercially viable) the s 32 report indicates that, like in the NPS-UD, only commercially viable options need to be assessed. This enables options to be discounted where they are not commercially viable from a developer’s perspective (eg, areas are too costly to develop due to topography, geotechnical issues etc.)
68. We have not considered additional greenfield growth at Feilding in our assessment of other reasonable and practicable options. As noted in the evidence of Ms Allen, there is expected to be sufficient development capacity to meet demand for housing within Feilding’s urban areas. However, this capacity will not meet the expected demand for rural type living within the wider Manawatū District.
69. A consideration of options for providing development capacity needs to be cognisant of the locations that will deliver on the requirement to meet *expected demand in the district*. There is a clear evidential basis that the demand for dwellings is split relatively evenly between the urban centre of Feilding, and the wider rural area that contains the Manawatū villages and their surrounding nodal areas for lifestyle or village-type development.
70. This has meant our consideration of other reasonably practicable and feasible options began with possible growth options within the other villages. A spatial analysis of the district considered that the villages of Halcombe, Cheltenham and Kimbolton would not be appropriate because of their further distance from the employment hubs of Palmerston North, Feilding and Ōhakea. A high-level growth options analysis that compares Rongotea and Sanson and areas adjacent to Rongotea has been undertaken and included as **Appendix B**. The detail included is high level and considered commensurate to the limited options that can be assessed by a private landowner.
71. As detailed in the MfE Guide to Interpretation on the NPS-HPL,⁴ in the case of private plan changes proposing urban rezoning of HPL, it is recognised that there are often more limitations on the reasonably practicable options that can be

⁴ [National Policy Statement for Highly Productive Land: Guide to Implementation](#), March 2023

assessed, particularly as it is often not possible for the private land owner or developer to acquire a range of other landholdings for development. It also needs to be noted that even if another option may be available, this does not mean the proposed urban rezoning cannot proceed. In this regard I note that while PC1 will provide capacity for approximately 140 - 160 houses, Ms Allen's reports indicates the demand for housing in the rural / village areas is closer to 640 – 658 dwellings over the next 10 years. As such, even if there were other options available, they would be unlikely to meet the full level of demand over the next 10 years.

72. Nevertheless, the options analysis included within **Appendix B** supports the Council's view in their Draft District Plan that Rongotea is the most suitable of the villages for urban growth and the PC site is the most logical area for the village to grow. This is further supported in the urban design evidence of Mr Williams for Council that states that the site is considered a logical area for the growth of Rongotea.⁵
73. In terms of being commercial feasible, all land included in PC1 is subject to a sales and purchase agreement with a well-established development company that has delivered housing in the mid range price points across New Zealand.
74. In summary, I am comfortable that there are no other reasonably practicable and feasible options for providing the required development capacity within the Manawatū District.

3.6 (4) (c) Do the benefits associated with the rezoning outweigh the costs associated with the loss of highly productive land?

75. The benefits of the plan change from an environmental, social, cultural, and economic perspective have been set out extensively in the application and s32 report and are fully supported in the s42A report.
76. With regard to whether these benefits outweigh the costs in respect of the loss productive land, an updated s32a report is included as **Appendix A**. The updated s32 considers the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA with respect to the NPS-HPL (developed under the

⁵ Appendix C S42A Report (page 5)

Act) which seeks to manage highly productive soils as finite resource. It considers the NPS-HPL under the most appropriate option of alternatives to address the cost/benefit analysis requirements of 3.6(4)(c).

77. The updated s32 report draws on information provided in the evidence of Sharn Hainsworth and Ruth Allen. It also draws on supporting information provided by local community groups and businesses that was obtained to ascertain a local perspective on the costs and benefits of the rezoning in relation the loss of this site considered productive land. This supporting information is included as **Appendix C**. I also note that difficulties and constraints on the productive capacity of the plan change site are discussed in the evidence of Duncan and Susan Cheetham.

3.6 (5) 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.

78. As demonstrated in the preceding paragraphs, the most reasonably practicable and feasible option for providing development capacity to meet expected demand for rural living in the Manawatū district is at Rongotea. To also be able to deliver on the objectives for the Village Zone in the Manawatū District Plan, the village character of the existing environment needs to be preserved. With that in mind, the proposed spatial extent of plan change area is considered the minimum necessary required to maintain village character while also ensuring that expected demand for rural/village living can be met.
79. In my view, cl 3.6(5) is intended to avoid zoning more land than is needed to meet the established demand. In this case, Ms Allen's report identifies demand for up to 640 - 658 houses over the 10 year period. Given PC1 will provide only 140 - 160, there can be no suggestion that more land is being rezoned than is necessary.

Conclusion on NPS-HPL

80. An assessment under sections 3.6 (4) and (5) of the NPS-HPL has been completed and demonstrates that PC1 gives effect to the NPS-HPL. The plan change will deliver

on housing development outcomes that are required to meet projected population growth and housing demand across the district. The land use capability of the soils has been examined in detail to understand their productive capacity and in relation to other soil types present within the district. Despite being (arguably) regarded as highly productive under the transitional definition of LUC Class 1 - 3, their use in a productive capacity is considered limited due their propensity to be either drought prone or waterlogged throughout the seasons. It is also limited by its location and propensity to reverse sensitivity issues, as outlined in the evidence of Duncan and Susan Cheetham. The costs associated with their loss are therefore not regarded as significant and in my opinion, it is clear that the benefits of the rezoning outweigh the costs associated with the loss of productive land.

National Policy Statement on Urban Development

81. The Manawatū District is a tier 3 local authority under the NPS-UD. While not all of the obligations in the NPS-UD apply, there are a number that do apply including:

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.

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

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 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: unanticipated by RMA planning documents; or out-of-sequence with planned land release.

82. Part 3 of the NPS-UD deals with Implementation and provides a:
83. ...non-exhaustive list of things that local authorities must do to give effect to the objectives and policies of this National Policy Statement, but nothing in this part limits the general obligation under the Act to give effect to those objectives and policies.

84. As noted earlier in my evidence, clause 1.5 provides that where tier 1 and 2 authorities are directed to take certain steps, tier 3 authorities are “*strongly encouraged*” to do so, “*adopting whatever modifications to the [NPS-UD] are necessary or helpful to enable them to do so*”.
85. As Rongotea is not strictly an “urban environment” in that it is intended to have more of a ‘village’ character than an urban one (see cl 1.4(1) definitions). However, as the zone proposed to be applied is classified as an ‘urban’ zoning, and because it contributes to meeting housing demand within the District as a whole, I consider the NPS-UD should still be considered.
86. I consider PC1 gives effect to the NPS-UD insofar as it is relevant because:
- (a) As an extension to Rongotea, it enables the area to perform as a well-functioning urban environment, in that it:
 - (i) enables homes that meet the needs of different households, particularly in contrast to what might otherwise be available in Feilding;
 - (ii) To the extent possible, it enables Māori to express their cultural traditions and norms through influence on the development design where appropriate;
 - (iii) Has good accessibility, particularly to community services such as schools, natural and open spaces, and is potentially to be serviced by public transport;
 - (iv) Is located in an area that will be resilient to the effects of climate change.
 - (b) It will make a substantial contribution to meeting expected demand for housing in a rural or village area, within the Manawatu District over the next 10 years.
87. There is nothing about PC1 that I consider to be inconsistent with the NPS-UD, or that would result in the District Plan failing to give effect to the NPS-UD. In my view declining the plan change would risk the Plan failing to meet some of the directives considered above. While the Council is continuing to work on meeting its obligations under the NPS-UD, in my view it is relevant that granting the plan change will better serve the obligations under the NPS-UD than declining it.

National Environmental Standard for Contaminated Soils

88. Considering the long history of productive land uses on this site, the applicant commissioned a preliminary site investigation to assess any soil contamination risks. This report concluded that the site has not been subject to land uses identified on the Ministry for the Environment's Hazardous Activities and Industries List. This NES is therefore not applicable to this application.

Horizons One Plan Regional Policy Statement

89. A comprehensive assessment against the relevant sections of the RPS is undertaken in Appendix J of the plan change application. In my opinion, PC1 gives effect to the relevant provisions of the RPS and this is also confirmed by the S42A Report which concludes that PC1 provides for:

- (a) Urban development in an area that is not particularly susceptible to natural hazards (Obj 9-1)
- (b) Maintenance of the flood control values that apply to the drainage channels within the site (Obj 5.1)
- (c) The integration of infrastructure provision with land use (Obj 3-3)
- (d) The life supporting capacity of Class 1 and Class 2 are not compromised by the effects of subdivision and development (Obj 3-4)
- (e) Respect for kaitiakitanga and the relationship of iwi and hapū with their ancestral lands (Obj 2-1)

90. Since lodgement of PC1, Horizon's Regional Council has notified Proposed Plan Change 3 (**RPS PC3**) to give effect to the NPS-UD (October 2022). A territorial authority must have regard to any proposed regional policy statement⁶.

91. In keeping with the purpose of the NPS-UD, the focus of RPS PC3's objectives and policies is on the provision of sufficient development capacity to meet the expected demand for housing and business land, and for the planning of well-functioning

⁶ Section 74(2)(a)(i) RMA

urban environments. The focus is on the region's urban environments of Feilding, Whanganui, Palmerston North and Levin.

92. Despite a focus on urban environments within the objectives, the following objective is considered relevant:

UFD-O1: Strategic planning and urban development

Strategic planning for urban development ensures that:

- (a) sufficient development capacity and land supply for housing and business uses is provided to support growth,
- (b) new development, development infrastructure and additional infrastructure are provided in a coordinated, integrated and efficient manner,
- (c) the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and
- (d) competitive land and development markets are supported in ways which improve housing affordability.

93. I consider that PC1 is entirely consistent with this objective, mainly for the reasons discussed above in relation to the NPS-UD.

94. With regard to (c) in providing for the diverse needs of the community, I consider providing housing options in a village setting, rather than an urban one such as in Feilding, is consistent with this objective.

95. With regard to (d) that requires urban development supports competitive land development markets to improve housing affordability, I note that PC1 introduces land supply in a single landholding. This lends itself to housing providers who are better positioned to deliver cost effective housing at scale.

The Manawatū District Plan

96. I consider that PC1 (with the modifications to the provisions as recommended) is consistent with, and gives effect to, the objectives and policies of the operative Manawatū District Plan as well as the objectives and policies proposed by PC1, because:

- (a) PC1 delivers on the urban growth objective for village zones which requires servicing to be addressed at the developers expense for growth areas around existing townships (Objective Urban Growth S8 a. iv)
- (b) Consideration has been given to the degree to which infill development is available in existing residential or village zones, although it is recognised that further work could be done in this area⁷ (Objective Urban Growth S8 a. v).
- (c) The site is well placed between the existing village zone and lifestyle development to minimise reserve sensitivity issues from incompatible surrounding land uses (Objective Urban Growth S8 a. ix).
- (d) The PC1 site is not considered versatile land under the Manawatū District Plan and will not fragment the ownership of such land (Subdivision Obj S1).
- (e) The general objectives for land use in the District Plan reflect the purpose and principles of the RMA. PC1 has been prepared in accordance with the RMA.

F: ASSESSMENT OF ENVIRONMENTAL EFFECTS

97. A comprehensive assessment of environmental effects was undertaken and included in the Application Report. The assessment was supported by a number of technical reports including:
- (a) GHD 3 Waters Report, including amendments in response to s92 requests
 - (b) Transport Report
 - (c) Rāngitane o Manawatū Memo
 - (d) Rongotea South Urban Design Framework
 - (e) Ecology Report
 - (f) Preliminary Soil Investigation
 - (g) Versatile Land Assessment
98. I do not restate all the assessment undertaken in the Application Report here. I specifically address relevant components of the technical reporting in my consideration of submissions and the Council s42A Report below. However, for completeness, I reaffirm my agreement with the overall conclusion reached within

⁷ Housing Demand Assessment Rongotea South Plan Change (page 22).

the Planning Report, subject to the modifications proposed in the s42A report. On this basis:

- (a) The actual and potential effects of PC1 have been fully considered, based on extensive reporting and analysis undertaken by a wide range of technical experts.
- (b) The area is suitable for the proposed Village Zone enabled by PC1 and the Rongotea South Development Area provisions will result in positive effects on the environment in terms of ecological protections on sensitive requirements and the social, and health and safety well-being of the community.

Where adverse effects are anticipated, the proposed policies and rules of PC1, in conjunction to those of the Manawatū District Plan and Horizon's One Plan, ensure they are appropriately avoided, remedied or mitigated.

G: COMMENT ON OFFICER'S s42A REPORT AND SUBMISSIONS

- 99. The Council's s42a report does not recommend accept based only on the lack of information, at the time, of how the proposal met the criteria in cl 3.6(4) and (5) of the NPS-HPL. There were no matters raised in submissions, or from an assessment of the technical evidence provided against the relevant statutory requirements which gave rise to the recommendation not to fully recommend accept. I note that Mr Batley has reached the conclusion that the plan change is broadly appropriate, with only the assessment against the NPS-HPL outstanding. I recognise and support this conclusion, with the added comment that, based on the assessment outlined above, I also consider PC1 is consistent with the NPS-HPL.
- 100. I support Mr Batley's recommendation to amend the provisions in response to issues raised by submissions made under the topic 'local character and amenity'⁸. I consider the modifications to objective DEV-O2 and the addition to the performance standard DEV-S6 are an appropriate method to address the issues raised by the submissions on this topic. The provisions will ensure improved outcomes for the interface with the existing rural residential development to the South to address the matters raised by these submitters.

⁸ S42A Report (pg 38)

101. I recognise submissions S04, S09, S08 and S09 that are in support of the plan change and consider that the provisions and the plan change in general will deliver on the outcomes envisioned by these submitters. I acknowledge and agree with the submitters that:

- a) The township is well placed to support sustainable growth.
- b) The redevelopment of the subject site will energise the village and provide recreational opportunities to current and future generations.
- c) The concept of a new recreational space will provide a safe and welcoming environment for all of the residents in the vicinity of the village.
- d) Support for the redevelopment of the wetland within the subject site as the [Rongotea and Districts' Lions] Club supports any project they see as benefiting the wider community. The development will also provide an educational environment for the 7 schools within the Te Kawau cluster
- e) Seeks that the developer be required to construct and form the "potential walkway" for the benefit of the wider community.

102. Submission S012 from Waka Kotahi requests a wording amendment to the provisions which I note has not specifically been addressed in the s42A report. The request is an inclusion of the term 'multi-modal' within DEV-02 to ensure that cycling and pedestrian linkages are not exclusively supported in terms of recreational outcomes. This recognises that the benefits of walking and cycling go beyond recreation to encompass travel in general. The following amendment is suggested (underlined):

DEV1 – O2

Subdivision in the Rongotea South Development Area creates a sustainable neighbourhood where:

- a. the development successfully integrates with the village character of Rongotea;
- b. natural site features are protected and incorporated into the development design;
- c. the recreational and multi-modal opportunities of the community are enhanced through the provision of public open space and pedestrian and cycle linkages; and...

103. I consider this amendment appropriate with regard to the overall objectives of the plan change and consider the proposed amendment by Waka Kotahi provides further clarification. The efficiency, effectiveness and appropriateness of this recommendation represent the most appropriate response in accordance with s32AA. In accordance with section 32AA(1)(c), the assessment of this change has been undertaken at a level of detail that corresponds to the scale and significance of the proposed changes.

G: CONCLUSION

104. Overall, after carefully considering the relevant statutory documents, the submissions and further submissions received and assessment undertaken in the S42A Report, it is my view that PC1 should be approved with the minor modifications to the provisions as recommended by the s42A report, and as recommended above.

105. Overall, I consider that the approach taken in PC1 to zone the land Village Zone including the application of Rongotea South Development Area and Structure Plan, is the most appropriate way to achieve the purpose of the RMA, and that the proposed provisions (in this case the zoning, and specific Development Area objectives, policies and rules (with appropriate amendments) are the most appropriate way to achieve these objectives and other higher order objectives in the Manawatū District Plan and the Horizon's One Plan.




Kim Anstey
11 May 2023

Private Plan Change Application: Rongotea South Development Area

July 2022
Updated May 2023



Revision history

Revision	Revision date	Details	Authorised	
			Name/Position	Signature
V 1.0	29/07/2022	Final s32	Matt Heale	
V 2.0	14/11/2022	updated s32 following s92 discussions	Ryan O'Leary	
V3.0	08/05/2023	Updated s32 to include assessment against NPS-HPL	Ryan O'Leary	

Section 32 Option Evaluation Report

1. Introduction

The Resource Management Act 1991 (RMA) at Section 32(1)(a) requires an evaluation to examine the extent to which the objectives of the proposed Plan Change are the most appropriate way to achieve the purpose of the RMA. Section 32 (6) sets out the meaning of the terms ‘proposal’, ‘objectives’ and ‘provisions’.

In this instance, the proposal is the proposed plan change, which seeks to amend the Manawatū District Plan in respect of land legally described as Section 36 Block II Douglas District and Lot 15 DP 565962 in the following ways:

- Rezone 21ha (Section 36 Block II Douglas District) from Rural 2 Zone to Village Zone
- Insert the Rongotea South Development Area chapter and associated Rongotea South Structure Plan

2. Proposed Objectives

The objectives of the proposal are the proposed objectives of the Rongotea South Development Area. The existing objectives of the Village Zone are also relevant. These collective objectives are as follows:

DEV1 – O1

Future housing needs are met through the integrated provision of infrastructure and development in accordance with the Rongotea Development Area Structure Plan

DEV1 – O2

Subdivision in the Rongotea South Development Area creates a sustainable neighbourhood where:

- *The village character of Rongotea is maintained,*
- *Natural site features are protected and incorporated into the development design*
- *The recreation needs of the community are met through the provision of open space and pedestrian and cycle linkages*
- *Cultural values are recognised and provided for*

Village Zone Objectives

LU 13) To maintain and develop the unique character and separate identity of the District’s smaller settlements, namely Kimbolton, Apiti, Halcombe, Bunnythorpe, Longburn, Sanson, Rongotea, Himatangi Beach and Tangimoana. This distinctive “village” character is different from Palmerston North and Feilding, and results from elements such as:

- a. A low density of residential development with larger section sizes and more open space.*
- b. Different road formation standards with less concrete and asphalt and more grass and shrubs.*

c. *Closer access to, and similarities with, the countryside.*

LU 14) *To maintain or enhance the residential amenity within those communities, which includes:*

- d. *A mixture of residential, commercial, service, industrial and community activities is achieved while protecting and enhancing the amenities of the village as a place to live.*
- e. *Access to adequate sunlight for residents' homes and properties, without prolonged shadowing from buildings, trees or structures on other sites.*
- f. *Residents are not subjected to fumes, smoke or odour problems.*
- g. *A level of aural and visual privacy consistent with small township living, with a quiet neighbourhood at night. (Refer also: Objective LU 25).*
- h. *A green, well-treed appearance and open streetscape, with planting on streets and in public places wherever possible, and with ample room for planting on private sections and front yards.*
- i. *Most vehicle parking being provided on-site rather than on the street*
- j. *Residents have access to public open space and to recreational and social opportunities, e.g. places of assembly, education facilities and community services. Adequate access is provided to these places for people with disabilities.*
- k. *The township generally has a tidy appearance.*
- l. *Neighbourhood streets cater for pedestrians and local traffic rather than encouraging through traffic. Street design promotes traffic safety and recognises that walking and cycling are important methods of transport. (Refer also: Objective LU 27).*
- m. *Problems associated with dogs and other wandering, dangerous or noisy animals are kept to a minimum. Stock droving does not occur through the centre of the village.*
- n. *Recognising that some of the villages are sited near broad-impact land uses.*
- o. *A high level of amenity and avoidance of those activities that can detract from this including unfinished or derelict buildings, piles of junk and car bodies being stored outside.*

The provisions are the policies and rules that make up the Rongotea South Development Area chapter as set out in Appendix I.

3. Evaluation Steps required under Section 32 of the RMA

The evaluative exercise under Section 32 includes the following broad sequential steps:

Step 1: Examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA

Step 2: Examine whether the provisions in the proposal are the most appropriate way to achieve the objectives

For completeness, this evaluation considers an additional Step 3

Step 3: Assessment of other practicable design options for achieving the objectives.

In respect of Step 2, the evaluation must identify other reasonably practicable options (different provisions or approaches) for achieving the objectives. Each of those different options, including the proposal, must then be assessed in terms of its efficiency and effectiveness in achieving the objectives. The assessment must consider the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. If practicable, those benefits and costs should be quantified, and the assessment the risks of acting or not acting should be assessed where there is uncertain or insufficient information about the subject matter of the provisions.

3.1. Step 1 – Are the objectives the most appropriate way to achieve the purpose of the RMA?

This plan change has been informed by a wide ranging technical review. This review has identified the key natural and physical resources of the site and the surrounding environment. The development area objectives have been designed accordingly to deliver social and economic wellbeing while protecting important environmental values and respecting any cultural associations with the site. The objectives, alongside the existing objectives of the Village Zone, are intended to provide a framework for development and use of the site that will facilitate sustainable management in accordance with the purpose of the RMA. The objectives find the appropriate balance between enabling development while protecting the natural and physical resources.

The following table provides further detail:

Table 1 - Assessment as to whether the proposed objectives are the most appropriate way to achieve the purpose of the Act

Proposed Objective	How the purpose of the Act is achieved
<p>DEV-O1</p> <p>Future housing needs are met through the integrated provision of infrastructure and development in accordance with the Rongotea South Structure Plan</p>	<p>This objective seeks to ensure that future development delivers on the outcomes defined in the Structure Plan. In developing the Structure Plan and associated planning provisions, the specific natural and physical resources that exist in the Rongotea South Development Area were carefully considered to ensure sustainable management was achieved under the RMA. The Te Kawau scheme drains have been protected by nominating an area either side as open space. The parcel of land to the south contains what is now defined as a ‘natural inland wetland’ although the area is currently extensively grazed and water is channelled and drained at part of the Te Kawau scheme drains. The plan change seeks to promote the sustainable use of this area by restricting development in this location. A constructed wetland for stormwater management provides for multiple community benefits. Vesting this as an asset and incorporating it into the public reserve area will provide for social and cultural wellbeing of the community, while safeguarding the life supporting capacity of the soils and water. The development will provide housing opportunities to meet the social and economic needs of the community. The layout of the development follows urban design principles that minimises the adverse effects of built development on the environment. The provision of infrastructure required to service this development has been designed to mitigate the environmental effects of flooding and to provide access to safe drinking water and wastewater services.</p>
<p>Sustainable neighbourhood</p> <p>DEV-O2</p> <p>Subdivision in the Rongotea South Development Area creates a sustainable neighbourhood where:</p> <ul style="list-style-type: none"> a. The village character of Rongotea is maintained b. Natural site features are incorporated into the development design c. The recreation needs of the community are met through the provision of open space and pedestrian and cycle linkages 	<p>This objective sets the framework and direction for ensuring the Rongotea South Development Area meets the definition of sustainable management under the Act while enabling the community to provide for their social, economic and cultural well-being. The village of Rongotea has a long history, being first subdivided in the 1800’s after being declared a special settlement area by the government of the time. In terms of physical resources, the historic roading layout is protected through an extension of the block layout, with opportunities for integrated roading connections that may be required in the future. The Rongotea Community Plan completed in 2015 identified the need for more public open space areas for recreation to improve social well-being. The natural features of the site lend themselves as areas appropriate for open space reserve and thereby also providing protection of amenity values. The sustainable management of physical resources (roading, reserves, pathways) is achieved by meeting the social and health and safety needs of the community through the provision of reserves and pathways. Subdivision policies require consultation with mana whenua to provide opportunities for cultural</p>

- d. Cultural values are recognised and provided for values to be reflected in the design of open spaces and wetland plantings, thereby enabling cultural well-being outcomes.

The above addresses the requirements of section 32(1)(a), in respect of the purpose of the RMA (section 5). For completeness, the following examines the contribution the objectives of the proposal make to achieving the principles of the RMA (sections 6-8).

Table 2: Assessment as to whether the proposed objectives are the most appropriate way to meet the principles of the Act

RMA Section 6 and 7 principles	How the principles of the Act are achieved
Maintenance and enhancement of the quality of the environment and the maintenance and enhancement of amenity values	While the landscape and streams within this area are not outstanding natural environments that would fall within Section 6 (relating to matters of national importance), these features are of local amenity and would fall within the Section 7 (other matters). A constructed wetland, open space areas and ‘green streets’ roading design will provide for the enhancement of amenity values of this area. These matters deliver on maintenance and enhancement in accordance with Objective DEV-O2.
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	The Essential Freshwater reforms introduced in 2020 have sought to refine the definition of a wetland with prescriptive tools for their identification, resulting in an area within Lot 15 DP 565962 being defined as a natural inland wetland. The RMA requires the preservation of the natural character of wetlands and protection of wetlands from inappropriate subdivision, use and development. It is arguable how much natural character remains of the area identified as wetland considering the water has been channelled via the Te Kawau Drainage Scheme managed by Horizon’s and the area has a long history of productive uses that includes grazing. The NPS-FM requires the restoration of wetlands. The proposal sets aside this area for open space to be vested to Council for ongoing protection. Objective DEV-O2 requires that natural features are incorporated into the development design.
The efficient use and development of natural and physical resources	In terms of physical resources, the location of the development area is in walking distance to a well serviced community with existing community and social facilities. The proposal provides of the efficient use and development of these existing physical resources. The Manawatū receives high rainfall and has pockets of productive soils. These natural resources will be preserved through providing for stormwater treatment and attenuation. The soils have not been assessed as highly productive. Both objectives DEV-O1 and DEV-O2 provide for the efficient use of natural and physical resources with natural areas protected through the creation of the

constructed wetland area and reserves to be vested in Council, as set out in the Structure Plan. New physical resources in the form of cycleways and walkways proposed.

The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers

While there are no rivers in the vicinity of the proposal, the structure plan sets aside a reserve area and walkways along waterways where public access will be provided for. This is delivered on through DEV-O1 via the Structure Plan layout, and DEV-O2. Point c.

The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:

The provisions of the development area provide the opportunity for Māori to express their relationship with the land and water. While no specific waahi tapu sites exist within the area, the development provides the opportunity for further engagement to occur at the detailed design stage to enable cultural expression in public areas, where appropriate. This is delivered via DEV-O2, point d.

Any finite characteristics of natural and physical resources

As a section 7 matter to have particular regard to, the NPS-HPL recognises that highly productive land is a resource with finite characteristics and long term values for primary production. However, urban zoning is enabled on soils considered productive under the NPS-HPL, providing it is required to provide sufficient development capacity to meet expected demand. This is delivered via Objective DEV-O1 that states the objective of Rongotea South Development Area is to deliver on future housing needs.

Step 2 - Whether the provisions in the proposal are the most appropriate way to achieve the objectives

Table 3 – Possible development options to achieve the proposed objectives: Status quo or enable additional residential development in the site through zoning options

Option 1 – Do nothing, retain rural zoning with a rural residential nodal overlay and wait until a Council initiated plan change

Option 2 – Apply village zoning with no structure plan

Option 3 – New chapter 17 - Rongotea South Development Area and amendments to the existing Village Zone provisions for permeable areas, building coverage, yards and fencing.

Zone description and purpose

This option would retain the Rural 2 Zoning on the land, together with the Rural Nodal Overlay that permits subdivision down to 4000m².

The Village Zone allows for subdivision down to 500m² with zone performance standards that would maintain

This option introduces specific provisions to give effect to the Rongotea South Urban Design Framework. A new chapter will contain objectives, policies and rules

Connection to infrastructure services would not be required. The permitted activity condition for on-site wastewater disposal in the Horizon's One Plan is 5000m² and so lots are generally of this size.

The purpose of this zone is to provide for a limited amount of Rural Residential subdivision while maintaining rural character and amenity.

a similar level of amenity that is currently experienced in the Village Zone.

In regard to lot sizes however, Rongotea is made up of lots ranging in size from 750m² to 1000m² providing a level of amenity akin to a rural village.

While sites have a maximum site coverage of 35%, there is no min. permeable area control for managing stormwater.

The current zoning and district wide rules do not require the attenuation of stormwater.

for subdivision, with minor amendments proposed to the Village Zone that will apply beyond the subdivision phase. These additions are permeable area and building coverage controls for stormwater management. With fencing and yard rules to provide for a positive reserve and street interface

Min lot sizes of 500m² are located in the centre, with larger 750m² - 1000m² lots on the periphery providing a transition between the development and the village with a logical extension of the existing pattern of development along Banks Road. Larger lot sizes of 1500m² are located to the west to form an interface with the existing Rural 2 zone. With the exception of min. lot sizes, corresponding permeable area and site coverage controls to manage stormwater and the introduction of yards and fencing rules, the underlying village zone performance standards will apply. This will ensure provisions meet existing and new development area objectives. The structure plan provides a workable street layout and lot configuration. Infrastructure requirements are detailed to enable connection with existing services at Rongotea.

Appropriateness

Whether the provisions of the proposal are the most appropriate way to achieve the objectives (s32(1)(b))

The objectives of the proposal are set out above. Option 1 that relies on the existing zone rules to create larger, un serviced rural residential lots would not have the benefit of being guided by the Rongotea South Urban Design Framework and Structure Plan

The objectives of the proposal are set out above. Option 2 relies on the existing Village zoning and district wide provisions to guide development. This would allow for a min. lot size of 500m² across the whole site with no controls for permeable areas to

The objectives of the proposal are set out above. Option 3 follows the National Planning Standard template by introducing the Rongotea South Development Area with set objectives and associated provisions to guide development.

that has documented the specific opportunities and constraints of the land, informed by a wide range of technical reports. It would not result in the integration of infrastructure and development and would not take advantage of the infrastructure servicing capacity available at Rongotea. Road layout would not necessarily reflect the village character of Rongotea, natural site features may be disregarded and open space opportunities may not be achieved. There would be no ability to require consultation with mana whenua.

As discussed in the application report, the landowner was pursuing this option through a 55 lot subdivision that is allowed for under the District Plan. Council advised after lodgement of their preference to rezone this area to provide an extension to the village. Council are therefore in support of the objectives of this plan change.

For these reasons, option 1 is not considered the most appropriate way to achieve the objectives of the proposal.

manage stormwater. The objective to enable development in accordance with a Structure plan will not be realised.

This option would preclude a planning approach that takes into account the unique characteristics of the site such as its location adjacent an area suitable for wetland enhancement and stormwater management and the stream network. It applies a “one size fits all” approach which would not necessarily provide the best overall outcome for the site or achieve the objective of a comprehensive and well-planned development guided by a structure plan.

For example, if the Village Zone was to be applied to the whole of the site without the Rongotea South Development Area provisions, then it is likely that any adverse effects on the natural environment including the identified wetland and stream/drainage network could not be fully avoided as many of the existing features on the site are not protected by the current provision of the Manawatu District Plan. Furthermore, the best and most efficient use of the land resource would not be achieved by the intensity of development enabled by the existing plan.

For these reasons, option 2 is not considered the most appropriate way to achieve the objectives of the proposal.

Structure Plans are a tool that recognise the unique characteristics of land and seek to establish, as necessary, place based provisions for that land where necessary to achieve the purpose of the RMA. The potential opportunities that have been identified as part of the assessment of this Plan Change will be enabled by the development of a site-specific Rongotea South Development Area provisions.

The provisions provide a suite of policies to deliver on the proposed objectives. Subdivision is provided for as a restricted discretionary activity, with matters of discretion and performance standards that guide the development to achieve the desired outcomes. The performance standards include specifying the min. lot sizes, and requiring a portion of all sites to remain permeable. There is a requirement to provide a stormwater management plan. Road design is to be in accordance with the structure plan and a shape factor is introduced. Specific infrastructure performance standards are included to require conformance with MDC’s engineering performance standards and the infrastructure upgrades and open space areas required as identified in the structure plan.

Community aspirations are embedded in the structure Plan, as informed by consultation and the Rongotea Community Plan.

For these reasons, Option 3 is considered the most appropriate way to achieve the objectives of the proposal.

Efficiency and effectiveness

Whether the provisions are the most efficient and effective means of achieving the objectives of the proposal (s32(1)(b)(ii))

Option 1 would not be efficient or effective in achieving the objectives of the proposed plan change and would be contradictory to Council's rezoning intentions.

Option 1 could deliver approximately 55 rural residential lots of approximately 5000m². This does not meet the Council objective of rezoning this area village zone to meet projected housing needs.

Option 1 relies on a subdivision design and layout put forward by the developer, without the benefit of an exercise that explores and documents the constraints and opportunities of the site to maximise its efficiency.

This option would not be effective in providing protection for the wetland and stream features of the site. While being adjacent to the Village Zone, it would not be required to meet with objectives of the village zone that include green, tree planted streets. Previous resource consent applications have not set aside areas for public open space which would result in less positive outcomes in terms of social, cultural and economic wellbeing.

This option would not be the most effective and efficient way of achieving the objectives of the proposal, or Council objectives for the area as outlined in their draft district plan

Option 2 would provide for a higher density development than what is proposed under Option 3. The current village zone rules allow for subdivision down to 500m² which would allow approximately 350 sites to be created across the 20ha site that was identified by Council for rezoning.

Without the benefit of a structure plan and associated provisions to guide development, there would be no requirement to provide for open space, or to set aside reserve areas along the scheme drains.

There are minimal standards for subdivision in the village zone currently. There is only the requirement to meet min. lot size, provide sufficient widths for vehicle access and to form legal roads when right of way access is to more than 8 Lots. There are no requirements to provide for open space areas, or to avoid development near waterways.

While the objectives of the village zone is that the village character is maintained, this does not currently translate to effective provisions for subdivision and there is the risk that the village character would be lost.

This option would not be effective in providing protection for the wetland and stream features of the site, in accordance with objective 2 of the Rongotea South Development Area.

Option 3 is considered the most efficient and effective means of achieving the objectives.

The development of the Structure Plan involved a detailed analysis of the site and surrounding area to identify its unique characteristics. The outcome is the proposed place based provisions that have been developed to achieve the purpose of the RMA.

This exercise identified that 140 – 180 lots can be provided for to make the most efficient and effective use of the site. The varying lot sizes is effective in meeting a variety of community housing needs.

The Structure Plan covers an area larger than what is proposed to be rezoned as it includes the 10ha block to the south. This has enabled sufficient space to cater for the stormwater and open space requirements of the development. The scheme drains (waterways) and natural wetland area has been set aside with direction to vest these assets to Council to ensure their ongoing protection and access for maintenance. This is the most effective way to deal with sites natural and physical features, while ensuring the objective of sustainable urban development is realised.

The detailed 3 Waters assessment that informed the structure plan has determined the most efficient and effective way to service the development, while

For these reasons, Option 2 is not the most effective and efficient way of achieving the objectives of the proposal, or Council objectives for the area as indicated in their draft district plan.

making the most of the infrastructure capacity available at Rongotea.

For these reasons, Option 3 has been assessed as the most effective and efficient means of achieving the objectives of the proposal, and the direction that Council is seeking in their draft district plan.

Benefits

Assessment of benefits of the anticipated environmental, economic, social, and cultural effects of the provisions, including economic growth and employment (s32(2)(a) and (b))

There would be some benefits of pursuing option 1, as follows:

- 55 new lots would contribute to the supply of rural residential sites to meet demand for this type of development
- No changes to the District Plan would be required which would provide cost savings to the council in terms of staff time
- Council may proceed with notifying the plan change regardless of any application to subdivide under the existing framework, and thereby have full control of the rezoning options.
- A subdivision using the current framework will result in a lower scale of development which from a social effects perspective, may be more acceptable to some people

There would be some benefits of pursuing option 2, as follows:

- Approximately 350 sites may be realised under the current Village Zone rules which would provide a considerable boost to housing supply in the Manawatu District.
- This option gives effects to Council's desire to grow the Villages in an area identified by Council as being appropriate.
- This higher density could provide up to a 50% increase in population to the Village of Rongotea which would provide an economic boost to the village, provide a greater pool of local employees and improve social outcomes.
- The minimal restrictions and controls for development that currently exist in the District Plan could make development more cost effective

The benefits of pursuing option 3 are as follows:

- The projected 160 – 180 lots will provide a sizable boost to housing supply in an area identified by Council as being appropriate for more intensive development
- The structure plan provides for the environmental protection of the areas identified as sensitive to development.
- The provisions provide the opportunity for cultural values to be reflected in the design of the development, if appropriate
- The urban design framework that informs the structure plan has provided a layout and density that ensures the village character is maintained.
- An additional 140 – 160 households will provide manageable growth for Rongotea that will deliver economic and social benefits for the Rongotea

community. It will provide an increase in the pool of local employees.

- The school has the capacity for community growth.
- It has been determined that there is capacity in the existing infrastructure services at Rongotea to support this level of development, with minimal upgrades required.
- The proposed provisions will create greater certainty of consenting outcome, with residential development enabled as a restricted discretionary activity with associated development standards, rather than as a controlled activity with little to no support via the objectives of the zone and precinct.

Costs

Assessment of costs of the anticipated environmental, economic, social, and cultural effects of the provisions, including economic growth and employment (s32(2)(a) and (b))

The potential costs for pursuing Option 1 are as follows:

- If subdivision proceeds without the identification of the natural features of the site, there is likely to be an environmental cost to development as there would be no requirement to set these areas aside for ongoing protection.
- There would be social costs to the community if development proceeded that did not create the opportunity to provide for much needed recreation areas with walking and cycling linkages to the village.

The potential costs for pursuing Option 2 are as follows:

- As with Option 1, if subdivision proceeds without the identification of the natural features of the site, there is likely to be an environmental cost to development as there would be no requirement to set these areas aside for their ongoing protection.
- There would be social costs to the community if development proceeded that did not create the opportunity to provide for much needed recreation areas with walking and cycling linkages to the Village.

The potential costs for pursuing Option 3 are as follows:

- The structure plan identifies the infrastructure required to service the development under a best practice scenario to achieve optimal environmental outcomes. Achieving good environmental outcomes from the servicing of a housing development can result in higher consenting costs.
- The same applies to best practice urban design outcomes. The costs to develop under these frameworks can be higher as they can remove the

- The economic and social benefits for the community of Rongotea would be less likely to be realised with a smaller, 55 lot development.
- There are currently no provisions that require consultation with mana whenua to provide them the opportunity to have their values reflected in the design of open space areas. Adverse cultural effects are likely under this option.
- This option would not require the development to be serviced by community infrastructure which provides better environmental outcomes and is overall a more cost effective means for delivering services.
- While there will be economic benefits realised with a 350 lot development, there may not be the demand required for a subdivision of this size so areas may be left underdeveloped resulting in social and economic costs to the community. In addition, there will be increased infrastructure costs to service a development of this size.
- There are currently no provisions that require consultation with mana whenua to provide them the opportunity to have their values reflected in the design of open space areas. Adverse cultural effects are likely under this option.
- In terms of infrastructure, under this option, the full costs of developing a feasible infrastructure solution will fall to the developer. Short cuts may be taken with costly environmental effects.
- While there are existing social and community facilities at Rongotea, they may not be able to accommodate a population growth of this size.
- ability for a developer to provide minimal roading. The block roading layout deters reliance on the use of private right of ways, instead of ensuring a road layout where the maximum amount of houses have a road frontage.
- There are significant costs associated with preparing a private plan change. There is the risk that it may be appealed leaving the development potential unrealised for a number of years.

Risks

Assessment of the risk of acting or not acting if there is uncertain or insufficient information about the provisions (s32(2)(c))

Information on the provisions is not uncertain or insufficient and therefore no identified risks arise as a consequence.

Information on the provisions is not uncertain or insufficient and therefore no identified risks arise as a consequence.

Information on the provisions is not uncertain or insufficient and therefore no identified risks arise as a consequence.

Summary

Option 1 would allow for a limited amount of development to occur on this site that would meet some of the objectives of the proposal, but not to the extent that would optimise benefits to the community, or the environment. This option runs the risk of achieving sub optimal environmental and urban design outcomes. Opportunities to provide for and enhance social, cultural and ecological values may be lost.

Option 1 has not been assessed as the preferred option for these reasons.

Option 2 allows for the maximum use of the area that would meet some of the objectives of the proposal, but that runs the risk of not achieving positive social, cultural and environmental outcomes. The current regulatory framework provides insufficient mechanisms to achieve good urban design outcomes. While there exists some objectives in the village zone that seek to ensure future develop maintains the village character, these are not reflected in the standards for subdivision and therefore sub optimal outcomes are likely. There is no requirement to provide for open space, or to manage stormwater efficiently to ensure positive environmental outcomes and to reduce the risks of flooding. Infrastructure costs under this option will be significant.

Option 2 has not be assessed as the preferred option for these reasons.

Option 3 has included a very thorough examination of the sites specific constraints and opportunities. The resulting structure plan, development objectives and District Plan provisions provide for a development of an appropriate size and scale to ensure the existing village character of Rongotea is maintained. The important natural features of the site have been identified and their protection enabled. Best practice stormwater management is feasible and planned for, and the integration of development with available infrastructure ensures sustainable development in accordance with the purpose of the RMA.

Option 3 has been assessed as the most appropriate option and is further tested under Step 3 below.

Analysis of Option 3 under the NPS-HPL

1. In this section, I have analysed option 3 of the s32 report in relation to the test set out in cl 3.6(4)(c) NPS-HPL. This considers the environmental, social, cultural and economic benefits of rezoning against the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.

Option 3 – New chapter 17 - Rongotea South Development Area and amendments to the existing Village Zone provisions for permeable areas, building coverage, yards and fencing.

Benefits of PC1 in relation to soils (environmental and economic)

2. Removing the site from productive use would remove the environmental risk associated with it being able to be used for intensive primary production. As detailed in the evidence of Sharn Hainsworth, Perch-Gley Pallic soils across the site are considered High Risk Category B soils for the application of dairy effluent and are also susceptible to nitrate leaching via bypass flow through subsurface cracks in the soil when used intensively. Productive use in this regard would therefore pose serious risk to the natural inland wetland within the site.
3. Sharn Hainsworth's comparative analysis of soils within this site compared with other soils within the Manawatū District considers the site has numerous limitations and environmental risk with being used for productive purposes. In summary these are:
 - greater risks of crop failures or variable yield compared with the same productive land use on alluvial soils because of the underlying pan and severe wetness limitations
 - the increased risk of droughtiness and need for irrigation,
 - the increased risks of leaching, ponding and runoff into waterways of contaminants,
 - the higher rate of structural degradation than on Class 1 or 2 land in the alluvial landscapes in the area, and the more constrained range of potential land uses that can be supported,
 - 2s2/hor3s4/nz3s27 land has a considerably lower overall Productive Capacity and a propensity for a higher environmental risk than Class 1 and 2 land on the alluvial areas.
 - LUC Class 3 land has less versatility and higher risks. More energy and cost is also required to produce from Class 3 land.
 - Class 3 contains a wide spectrum of versatility, productivity and risks/complexity for management.
4. Mr Hainsworth's evidence goes on to state that *"allowing development in Class 2s2/hor3s4/nz3s27 and Class 3e4/nz3e16 land (25,610 ha) will not detrimentally impact on overall Productive Capacity in the Manawatū District to the same extent as if development was to continue to be allowed on the alluvial Class 1 and Class 2 land in the district"*
5. Mr Hainsworth states that, in his opinion, it makes sense to focus on allowing development on soils and land in loessial landscapes from a flood-risk and managed retreat perspective as LUC Class 2s2/hor3s4/nz3s27 land occurs above flood-level.

Benefits in relation to wetland protection (environmental)

6. The wetland discovered as part of this plan change process is not currently identified in a regional plan and therefore there are currently no other protections afforded to it. The Rongotea South Structure Plan and development area provisions recognise and protect the natural inland wetland discovered as part of this plan change process which will therefore assist both Horizons and MDC to meet their obligation to protect wetlands under the NPS-FM.
7. The plan change is the mechanism to set aside the waterways and natural inland wetland area as a new public reserve, thus providing much greater protection than what currently exists under its use as production land. The social, cultural and environmental benefits of protecting these areas are clearly expressed in submission S07 and further supporting information provided by the Rongotea and District's Lions Club included in **Appendix B** in the evidence of Duncan and Susan Cheetham.
8. Overall, the risk to the wetland is potentially much greater if the productive use of the land intensifies, and/or grazing is continued.

Community benefits (social and economic)

9. Supporting information provided by the Rongotea Community committee is that the plan change area is "not particularly good farmland" and that the site is the best location for Rongotea to grow. A letter provided by the group in support of meeting the requirements of the NPS-HPL (Appendix C) goes on to detail the social and economic benefits that an increased resident base would bring and includes:
 - Economic support for local businesses
 - Opportunities to increase community group memberships
 - Cost sharing benefits for wastewater and water supply services and upgrades

I note the committees request for a footpath down Banks Rd to Severn Street is provided for in the structure plan as well as public open space and walkways to be vested with Council.

Market demand and location benefits (social, economic and environmental)

10. Supporting information provided by Mid West Realty Limited (Bayleys, Palmerston North and Feilding) consider Rongotea would be a favoured location to meet the market demand for new build housing because of its desired village style life for young families and for its proximity to the employment hub at Ōhakea.
11. The letter from Bayleys (**Attachment A** in the evidence of Ruth Allen) provides quantitative evidence that there is a strong demand to purchase properties within the Manawatū coming from people who live outside of the region. This provides support to the Infometrics population growth projections used in the evidence of Ruth Allen.
12. An additional observation made was that the location of Rongotea as a housing option for Ōhakea personnel provides access to Ōhakea without needing to cross the Rangitikei River. This river is subject to flooding that could potentially compromise the structural integrity of the bridge restricting access for personnel that may live in Bulls in times of emergency. The Ōhakea expansion is currently scheduled to

be completed in late 2023 and will require the relocation of 250 personnel from Whenuapai to the Manawatū region.

Cultural Benefits

13. These are clearly articulated in the Appendix E of the application from Rāngitane o Manawatū which was provided on the basis that the plan change, as proposed, would deliver on Rāngitane o Manawatū Te Mana o Te Wai objectives. Based on this support, and considering the above listed environmental risks associated with the alternative of maintaining this land as production land, it can be assumed that PC1 would be the best use of the land in terms of providing for cultural values.

Costs associated with the loss of production land under Option 3 (PC1)

14. Once zoned for residential purposes, it is highly unlikely that the rezoning would be reversed. If it is considered that the site is HPL for the purposes of the NPS-HPL, the change of land use from rural to urban could be considered a permanent loss of rural activities on this site.
15. Intangible values associated with the loss of highly productive land include:
 - the ability for it be used in the future if a suitable crop is developed or new technologies enable better outcomes for growing crops on water logged soils.
 - The rural land surrounding Rongotea creates a sense of place for residents
16. Tangible values associated with the loss of highly productive land include:
 - Reduction in land available for arable and pastoral farming
 - The impervious areas created with housing development will reduce the area of soils currently filtering water and nutrients
 - Soils for use as flood mitigation will be lost

Summary

17. In applying the NPS-HPL and meeting the tests under 3.6(4) (c), this option provides an optimal outcome for Rongotea and the wider Manawatū District. While it is recognised that there are some costs associated with the loss of highly productive land, this option provides for required development capacity to meet demonstrated demand for semi-rural living in the Manawatū District, outside of Feilding and the benefits listed above clearly outweigh the costs. It is a more efficient and effective option than using highly productive land for further rural lifestyle development. The increased offering of greenfield sites would contribute to a reduction of the adhoc development that is currently occurring in the Manawatū District's Rural Zones.

¹ [Ōhakea Air Force base to hold two large hangars, workforce of 1200 | RNZ News](#)

Step 3 - Assessment of other practicable design options for achieving the objectives.

Section 32 also requires specific evaluation of the proposed plan provisions. While there are multiple aspects to the Rongotea South Development Area provisions, their development followed the progression of the overall structure plan which traversed various options that were subsequently refined. This stage of the Section 32 evaluation therefore focusses on evaluating other reasonably practicable design options for achieving the objectives.

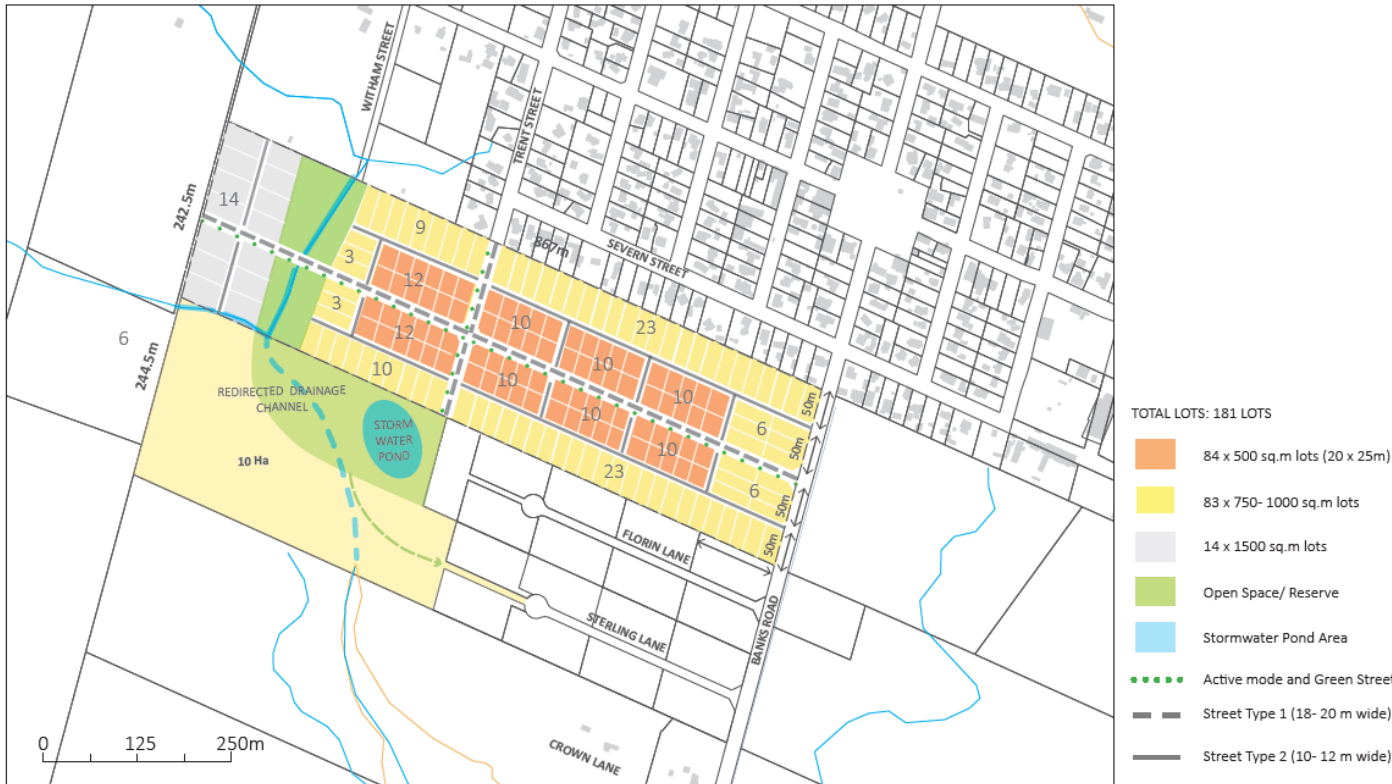
Design Option 1

Key Characteristics



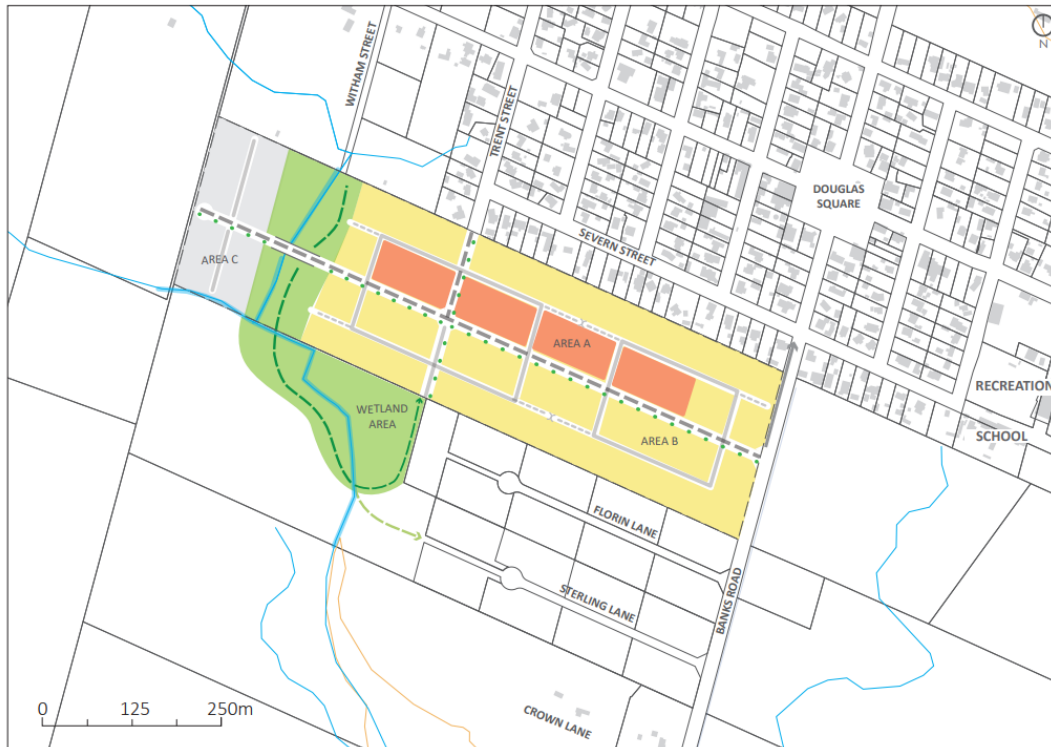
- Initial stages of design did not consider the management of stormwater and the space required to achieve best practice stormwater management
- There was a north to south roading layout proposed, however this resulted in streets that abruptly ended and would have required multiple turning heads.
- Two roading connections onto Banks Road were considered
- This option was subsequently refined.

DRAFT Structure Plan Option 2



- This option had three roading connections with Banks Road, which has a 100km/hr speed limit
- The internal road layout meant 6 lots on the east would also have frontage to Banks Road
- A stormwater wetland area was incorporated and it is proposed that the scheme drains are redirected.
- Walking connections back to Rongotea have not been identified
- 84 lots of 500m² were proposed increasing the density to a minimum of 180 Lots

Rongotea South Structure Plan



SITE AREA: 21 HA
LOT YIELD: 140- 180 LOTS

- Area A: 500 sq.m lots
- Area B: 750- 1000 sq.m lots
- Area C: 1500 sq.m lots
- Open Space/ Reserve
- Open Waterway
- Active mode and Greenway
- Street Type 1 (20 m w)
- Street Type 2
- Street Type 3
- Bridge over waterway
- New Footpath Connection
- Walkway Opportunity

- Lot yield and typologies responds appropriately to housing needs
- Provides a safe and legible street layout
- Limits access onto Banks Road to one T intersection
- Provides an appropriate area for open space reserve to protect the area mapped as natural inland wetland
- Responsive to local landscape features
- Provides for high quality active streetscapes
- The final structure plan combines and refines the best of the options considered above

4. Conclusions

The Proposed Rongotea South Development Area provisions and accompanying Structure Plan have gone through a process of refinement with the final product containing the best aspects of the three options evaluated above.

Overall, the proposed plan change has been thoroughly informed by a team of multi disciplinary experts and tested in terms of Section 32. The resulting proposal provides significant community and environmental benefits while also ensuring stormwater is effectively managed and infrastructure servicing is efficiently provided for. The development is expected to add to the residential land supply to the extent of 140 – 180 dwellings. While Council initiated consultation on this proposal via the Draft District Plan in early 2021, further consultation has occurred with adjacent property owners, mana whenua and the community committee.

Based on the above assessment, the PPC is considered the most appropriate way for achieving the purpose of the Act. The proposed objectives for the area are deemed to be efficient and effective. The costs and benefits to the proposal have been assessed against other viable options to conclude that the PPC is the best option for delivering social, environmental, cultural and economic benefits.

Appendix B
Rongotea and Sanson
High Level Growth Options Analysis
May 2023



Regional Context

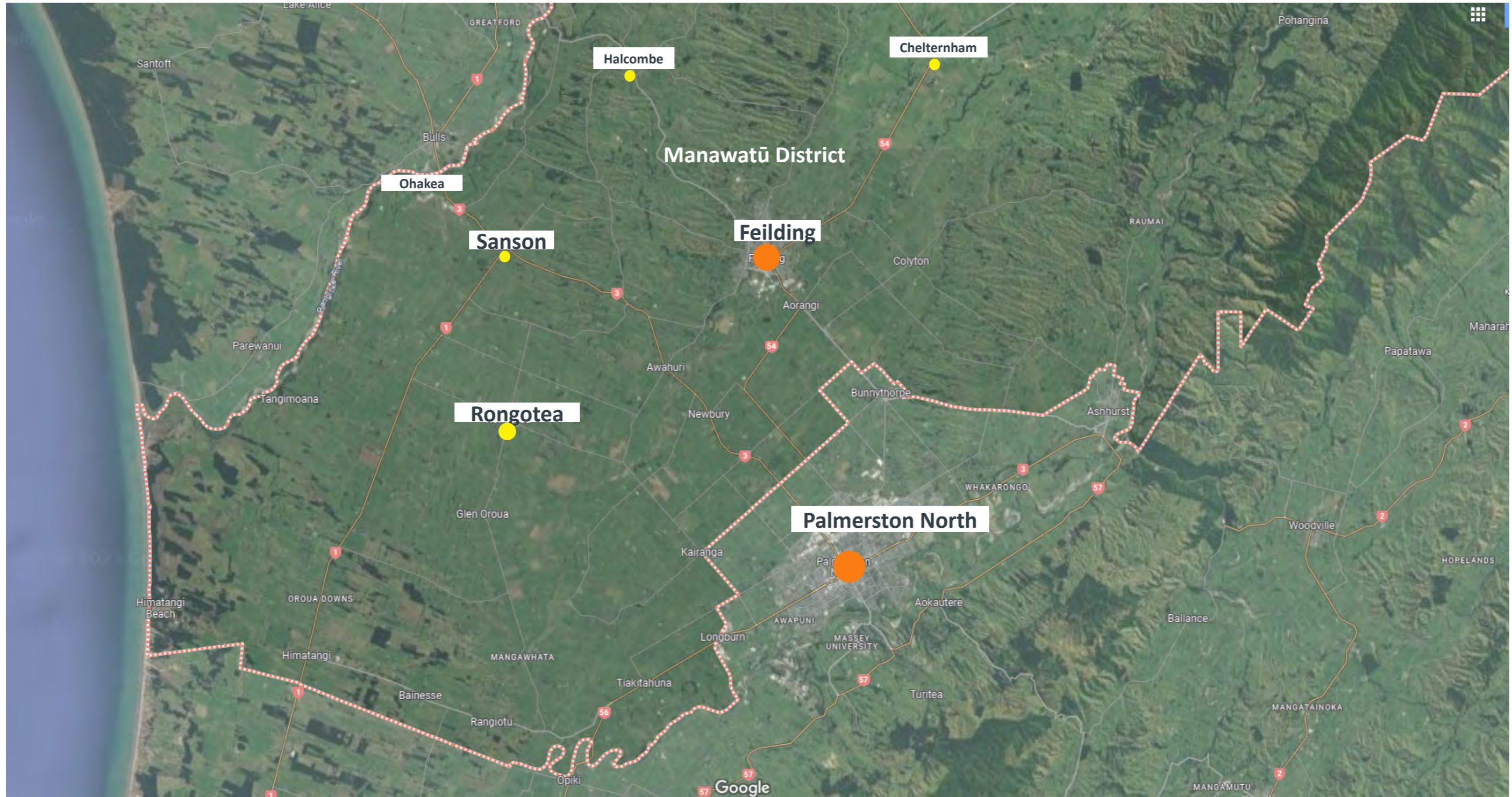
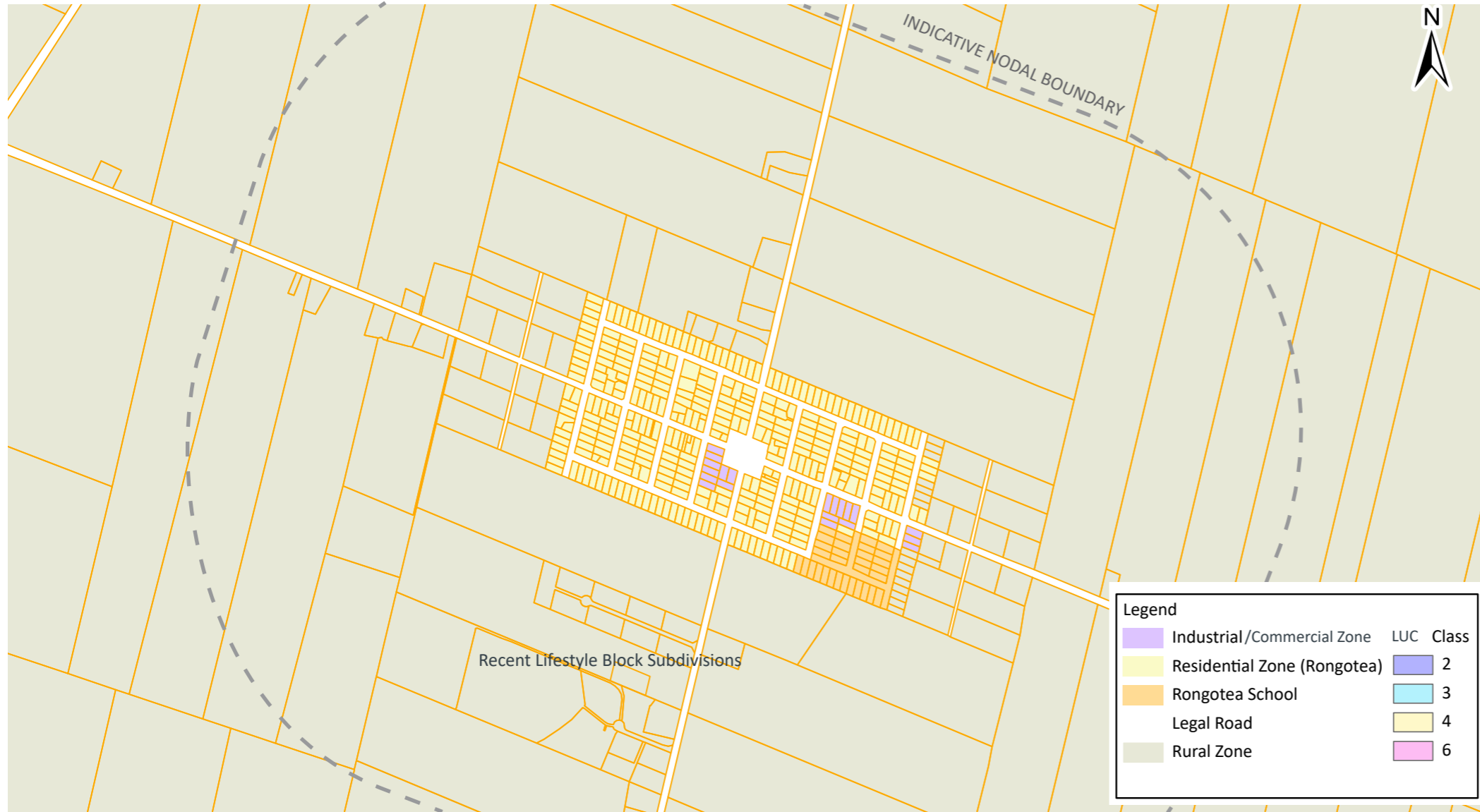


Figure 1: Regional Context

- Urban
- Village

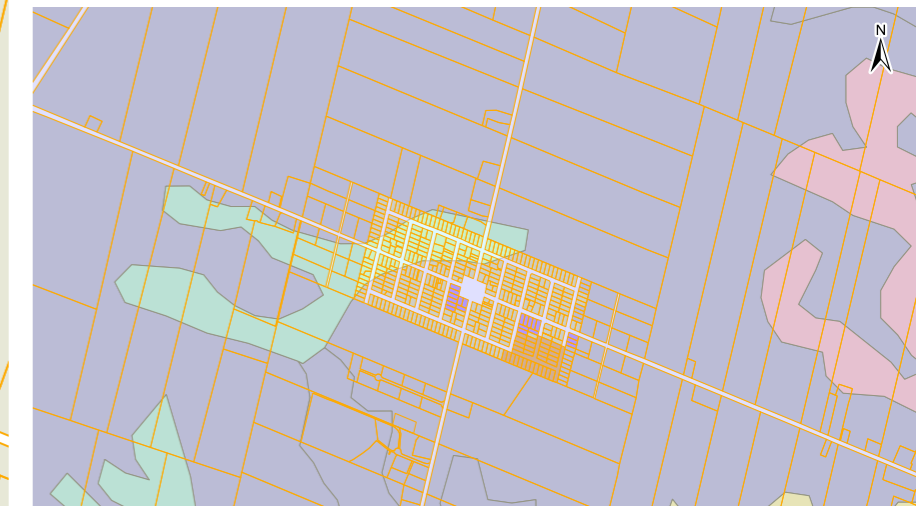
Rongotea- High Level Growth Options Analysis



Rongotea: Planning Zones



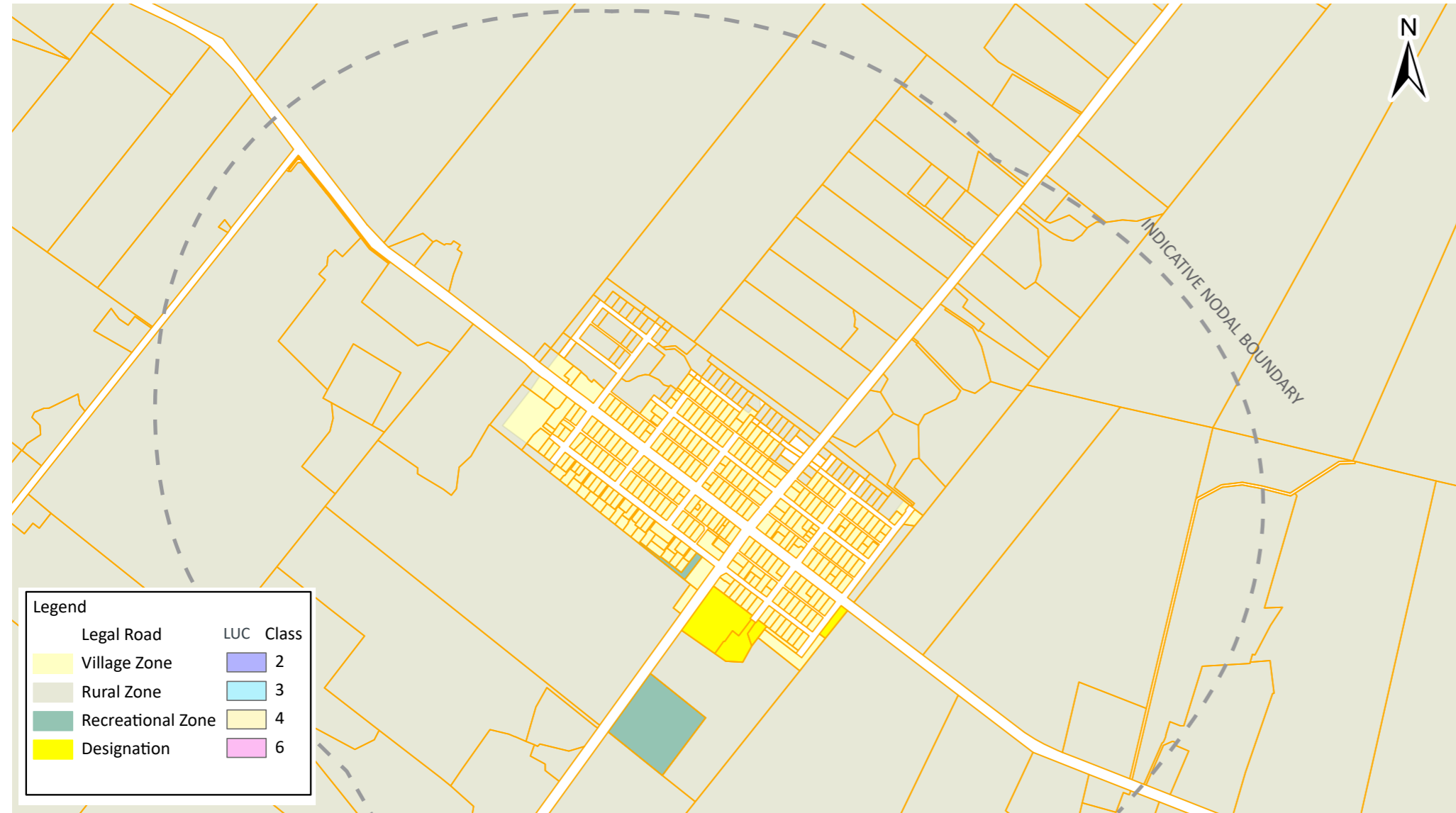
Rongotea: 200 Year Inundation Extent (Source: GHD June 2022)



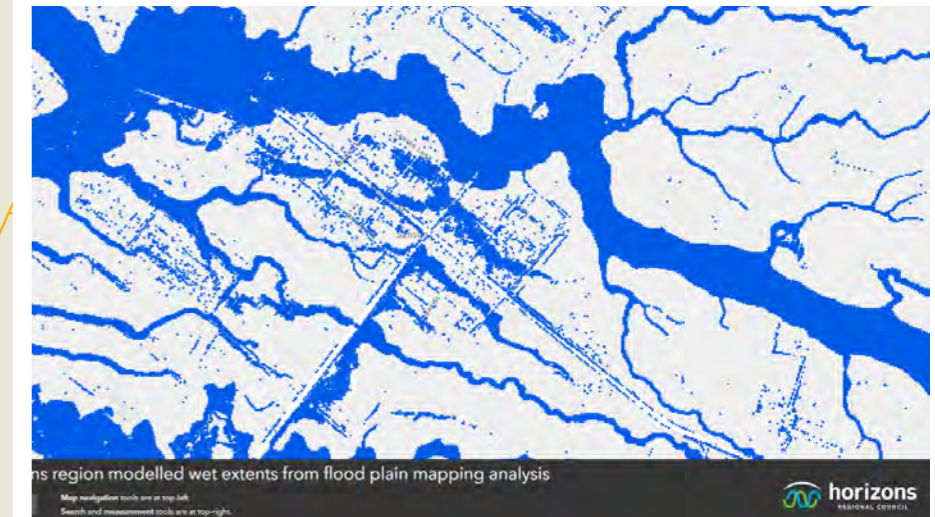
Rongotea: Soil Classification Map

Values and Challenges	Opportunities	Market Considerations	Summary
<ul style="list-style-type: none"> Has been mapped to contain Class 2 and Class 3 Soils Requirement to maintain Village character Contains flood drainage channels Well located between Palmerston North and Ōhakea Air Base Poor draining soils that limit agricultural productivity Very few natural hazard constraints While existing community facilities are strong, job market within village is limited 	<ul style="list-style-type: none"> Rongotea Community Plan action was to allocate land for future growth Wastewater Centralisation Project scheduled for 23/24 financial year Existing services can be efficiently extended Second largest settlement in the Manawatū district Opportunity to protect and restore natural inland wetland Public bus route being considered by Horizons in their Regional Land Transport Plan (RLTP) 	<ul style="list-style-type: none"> Higher number of recent property sales compared with Sanson Active lifestyle development occurring to the South No geographical constraints that would impact commercial feasibility Servicing available 	<ul style="list-style-type: none"> Potential to support further village development in keeping with village character Future growth supported by the Community Potential to make significant contribution to housing supply Opportunities for wetland protection, environmental enhancements and improved recreation outcomes Infrastructure servicing no barrier for development

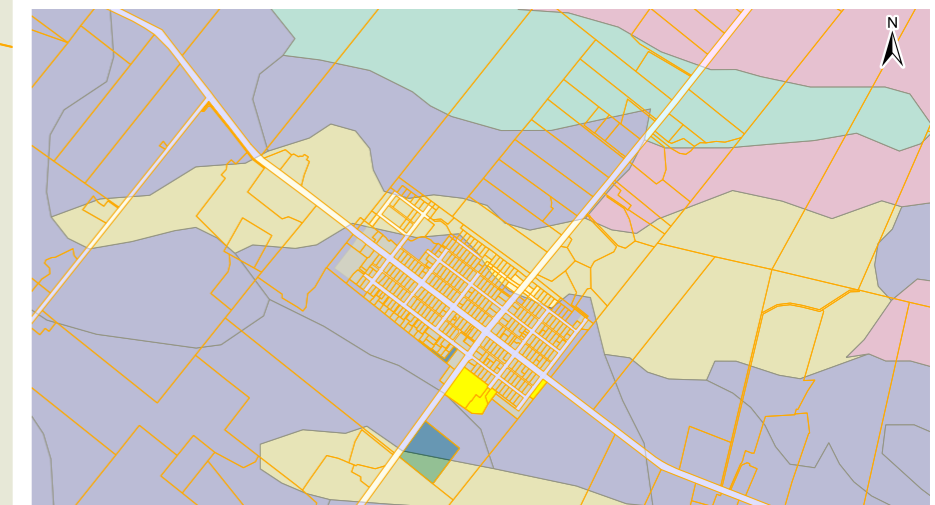
Sanson- High Level Growth Options Analysis



Sanson: Planning Zones



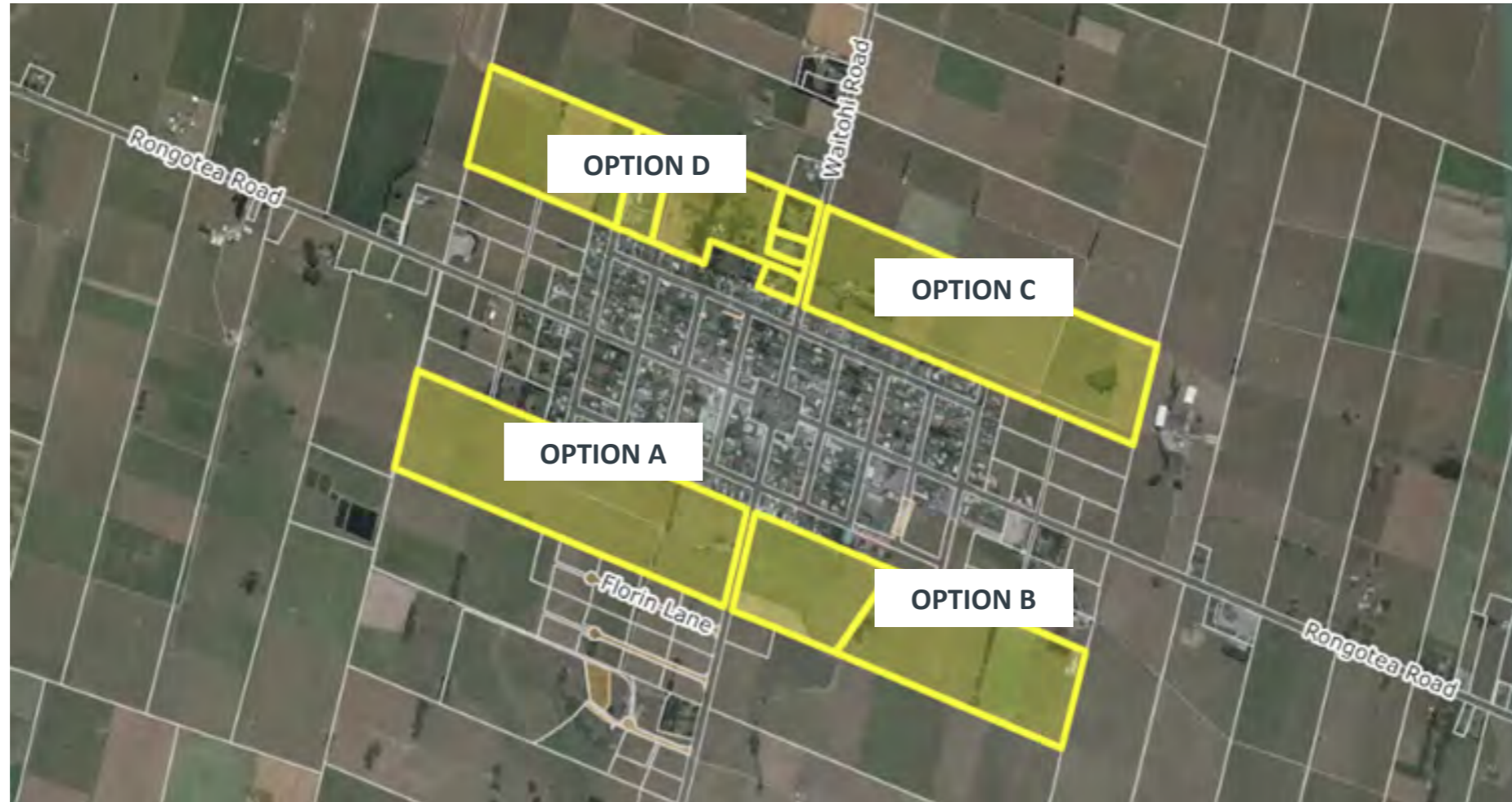
Flood Plain Modelling Sanson (Source: Horizons Regional Council)



Soil Classification Map: Sanson

Values and Challenges	Opportunities	Market Considerations	Summary
<ul style="list-style-type: none"> Has been mapped to contain Class 2 and Class 4 Soils While area to the north of Sanson contains Class 6 soils, this area has been mapped as flood risk Located at crossroads of State Highway 1 and State Highway 3 Sanson Community Plan does not identify future urban growth as a priority. Within close proximity to Ōhakea Air Base with village located within the 55Ldn and 65Ldn noise boundaries Within a water supply source protection zone While existing community facilities are strong, job market within village is limited Requirement to maintain Village character 	<ul style="list-style-type: none"> Wastewater Centralisation Project completed Existing services may be able to be efficiently extended Centrally located to Feilding, Bulls and Palmerston North 	<ul style="list-style-type: none"> Some nodal lifestyle development occurring Further development constrained due to impact on state highways Location within air noise boundaries Some infill development occurring 	<ul style="list-style-type: none"> Complexities of state highways and Airport noise boundary designations create challenges for urban growth Flood risks would need further evaluation Area not subject to flood risk is mapped as Class 2 soils that would need further evaluation as to their productive capacity

Rongotea Growth Options Analysis- Opportunities and Constraints



Option A (Best Option)	Option B	Option C	Option D
<ul style="list-style-type: none"> • Contained within a single landholding • Landlocked for agriculture being between urban and lifestyle development (reverse sensitivity) • Natural extension to provide connection between existing lifestyle development and village • Includes an adjacent sensitive environment with provisions for protection within proposed plan change • Presence of wetland poses risk to agriculture • Supported by iwi with respect to wetland protection • Well located for infrastructure connections. Closer to wastewater pump station • Location viewed most suitable by Rongotea Community Committee 	<ul style="list-style-type: none"> • Intergenerational, organic dairy farm connected to a larger cohesive production lot • Application with Council to create lifestyle sections along Banks Road • Potential reverse sensitivity issues being adjacent to school and close to sale yards • Further from wastewater pump station so infrastructure servicing costs could be greater 	<ul style="list-style-type: none"> • Currently farmed as part of a larger cohesive production Lot • Contains established dwelling • Not contiguous with existing development to the South • Further from Wastewater pumpstation so infrastructure servicing costs could be greater • Some flooding risk identified through stormwater modelling completed for Option A 	<ul style="list-style-type: none"> • Area contains multiple land titles under separate ownership which poses challenges to structure planning • Contains established rural residential development