BEFORE THE HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change A: Growth Rezonings

SECTION 42A REPORT OF DANIEL BATLEY ON BEHALF OF TARARUA DISTRICT COUNCIL

PLANNING

Dated 25 November 2026

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Executive Summary

1. Proposed Plan Change A proposes the rezoning of land from Rural Zone to either Residential or Industrial Zone to establish new development areas across the four main townships of the District. The purpose of the development areas are to provide additional land to assist in providing for additional housing and industrial development over the next 30 years.

2. The purpose of this Officer's Report is to assist the Independent Hearings Commissioner in making decisions on submissions on Proposed Plan Change A to the Operative Tararua District Plan.

3. This report should be read in conjunction with the following documents:

    - Plan Change A as notified
    - The accompanying section 32 report
    - The original and further submissions received on the plan change

4. A range of submissions and further submissions were received on the plan change. The following issues are considered to be the key issues in contention:

    - Preliminary matters
    - Whole plan change and general matters
    - Infrastructure capacity constraints and costs
    - Stormwater management and flood risks
    - Loss of versatile soils
    - Matters relating to the Woodville IGDA
    - Matters relating to the Oringi IGDA
    - Matters relating to the Pahiatua IGDA
    - Matters relating to the Dannevirke RGDA
    - Matters relating to the Eketāhuna RGDA
    - Matters relating to the Woodville RGDA
    - Matters relating to the Pahiatua RGDA
    - Natural Hazards
    - Specific matters, subdivision rules and standards

    The submissions considered in this report have been grouped by issue. I have provided recommendations to assist the Hearings Commissioner in respect of accepting or rejecting submissions made in Appendix 1 of this report.

    I have also recommended amendments to DEV02 after consideration of the relief sought in submissions. Appendix 2 of this report sets out my recommended changes to the notified provisions.

Abbreviations

TDC/the Council – Tararua District Council

ODP – Operative Tararua District Plan

HRC – Horizons Regional Council (Manawatu-Whanganui Regional Council)

LTP – Tararua District Council Long Term Plan

NPS – National Policy Statement

NPS-UD – National Policy Statement on Urban Development

NPS-FM – National Policy Statement for Freshwater Management

NPS-NH – National Policy Statement for Natural Hazards

PCA/PPCA/Plan Change – Proposed Plan Change A (subject plan change)

NPS-HPL – National Policy Statement on Highly Productive Land

RMA – Resource Management Act 1991

TDUGS – Tararua Urban Growth Strategy 2024-2054

IGDA – Industrial Growth Development Area

RGDA – Residential Growth Development Area

Introduction

Purpose of Report

5. The purpose of this report is to summarise the key issues raised in submissions to Proposed Plan Change A (PCA) and to provide advice on these matters to the Hearing Commissioner. Issues raised in submissions have been evaluated in this report, with recommendations on whether to accept or reject the relief sought in those submissions. The submissions points are grouped into 'topics' to enable more efficient assessment of common issues. Accordingly, submissions are not analysed on an individual basis, as is provided for under clause 10(3) of Part 1, Schedule 1 of the Resource Management Act 1991 (RMA). Appendix 1 to this report sets out my recommended decisions on each submission point and further submission point.

6. The recommendations also include amendments to the notified proposed plan change provisions, including the introduction or deletion of provisions and refinements to some of the wording, where I consider these are necessary or appropriate in response to submissions and evidence. A s32AA assessment of recommended changes is provided at the end of this report. Appendix 2 sets out my recommended amendments to the plan change provisions.

7. As the hearing timetable provides for pre-hearing meetings, technical evidence from submitters and (where applicable) expert conferencing, the recommendations contained within this report are preliminary only.

8. Any conclusions reached or recommendations made in this report are not binding on the Hearing Commissioner. It should not be assumed that the Hearing Commissioner, having considered all the evidence brought before them, will reach the same conclusions that I have.

9. This report is intended to be read in conjunction with the notified PCA documents, which include the s32 Report and supporting appendices. These documents are available on Council's website.

10. This report should also be read in conjunction with the following s42A reports dated 25 November 2026, as follows:

    - Statement of Evidence of Mr Chris French – Three Waters
    - Statement of Evidence of Mr Killian Destremau – Economic Growth

Qualification and Experience

11. My full name is Daniel Batley, and I am a Senior Planner at Evergreen Consulting Limited. I hold a Bachelor of Resource and Environmental Planning from Massey University.

12. I have close to 15 years of experience in planning and resource management. I have worked in both consenting and policy planning roles in local government and have been a consultant planner for nearly six years which has included a combination of policy and strategic planning, consent preparation, and planning and consenting support for local government.

13. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. I have complied with the Code of Conduct when preparing my written report and I agree to comply with it when participating in the hearing.

14. Other than where I state that I am relying on the advice of another person, the opinions expressed in this report are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

15. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the report in which I express my opinion. Where I have set out opinions in this report, I have given reasons for those opinions.

Technical Evidence and Reports

16. PCA is supported by a suite of assessments and technical reports which were notified with the plan change and are available on the Council's website. In preparing this report, I have reviewed and considered this information, which includes:

    - Section 32 Report: Proposed Plan Change A
    - Industrial, Residential and Projection analysis completed by BERL.
    - Tapuata Stream Flood Assessment completed by River Edge Consulting.
    - Existing Horizons (Manawatu-Whanganui Regional Council) Flood modelling for Woodville and Pahiatua.
    - Highly Productive Land Assessment of proposed rezonings completed by EcoAgrilogic.
    - Infrastructure capacity, optioneering and feasibility study completed by Rationale.
    - Agribusiness Study completed by Journeaux Economics.
    - Tararua District Urban Growth Strategy 2024-2054.
    - Keeping of Animals Bylaw 2024

17. Collectively, these reports form the evidential basis for PCA, except where updated through the s42A reports listed at paragraph 10 above. In addition to my own observations, I have relied on the reports listed at paragraph 10 and the original technical reports notified with the plan change. As stated above, I have also reviewed all submissions on PCA.

18. I have also visited the plan change sites and surrounding environment on multiple occasions.

Report Format

19. This report has been prepared in accordance with section 42A of the Resource Management Act 1991 to assist the Hearing Commissioner with its consideration of submissions received in respect of this Plan Change.

20. This report is structured according to the following format:

    - An overview of Proposed PCA
    - Statutory Requirements
    - Analysis of Submissions
    - Recommended Decisions
    - Conclusions

21. Where I am recommending amendments to the notified plan change, I have undertaken an evaluation under s32AA of the RMA and this is included following the analysis of submissions in relation to the relevant issue.

22. The report discusses each submission or groups of similar submissions and includes a recommendation from the reporting officer on each submission received; **it should be noted that the recommendation does not represent the decision of the Hearing Commissioner.**

23. The recommendations within this report have been informed by the additional s 42A reports on technical matters as listed above at paragraph 10.

24. Following consideration of all the submissions and supporting evidence, if any, presented by the submitters and further submitters at the hearing, the Hearing Commissioner will hear and make decisions on the plan change.

25. This report includes recommendations to the Hearing Commissioner to accept, accept in part, reject or reject in part individual submission points and any amendments to PCA. A table of submission and further submission points along with recommended decisions and a reference

to where this point is evaluated in this report is included as Appendix 1 to this report.

26. The amendments I am recommending to the plan change provisions are shown in Appendix 2 of this report.

27. The Analysis of Submissions section has been structured by grouping submission points into topics. Within each topic, the submission points have been grouped into sub-topics. These topics are listed below in the order they appear in this report.

    1. Preliminary matters
    2. Whole plan change and general matters
    3. Infrastructure capacity constraints and costs
    4. Stormwater management and flood risks
    5. Loss of versatile soils
    6. Matters relating to the Woodville IGDA
    7. Matters relating to the Oringi IGDA
    8. Matters relating to the Pahiatua IGDA
    9. Matters relating to the Dannevirke RGDA
    10. Matters relating to the Eketāhuna RGDA
    11. Matters relating to the Woodville RGDA
    12. Matters relating to the Pahiatua RGDA
    13. Natural hazards
    14. Specific matters, subdivision/land-use rules and standards

Background and Context

Purpose of Plan Change

28. The issues this plan change seeks to address and the rationale for the proposed approach, are set out in the s32 report. A summary of this is provided below.

29. Tararua District is experiencing growing population pressure, driven by its wide-open spaces, lower cost of living and improved connectivity, including the new Te Ahu a Turanga Highway to Palmerston North and proximity to Hawke's Bay, Wairarapa and Wellington. The district is projected to grow by up to 3,400 people over 30 years under the high growth projection, and up to 4,140 under the aspirational scenario.

30. The Council is encouraged by the NPS-UD to provide enough housing capacity. It also needs a District Plan that can manage growth and a diversifying economy sustainably.

31. PCA is part of the Council's response to growth. It is proposed to rezone about 116 hectares across Dannevirke, Woodville, Pahiatua and Eketahuna for residential growth, creating roughly 1,700 new residential lots. It would also rezone about 40 hectares for industrial use. This aligns with the growth locations in the TDUGS.

32. The plan change areas comprise predominantly rural land contained within the Rural Management Area of the ODP. The current zoning can be seen of the ODP Panning Maps.

33. PCA also introduces the RGDA and IDGA frameworks, along with new zoning, to establish objectives, policies, rules and methods, to guide the spatial, environmental and urban design outcomes of the new development areas.

34. The proposed provisions primarily focus on managing subdivision within the areas. Some provisions within the IGDA are included to manage land use activities in these locations also.

PCA Direction

35. The Tararua District is experiencing growth after decades of low to no growth. The Council expects about 3,300 more people over the next 30 years under the high growth scenario. Households will grow even faster because average household size is falling, so the district will need about 1,800 new dwellings. Growth is expected to be strongest between now and 2038.

36. PCA implements the residential and industrial growth recommendations of the Tararua District Urban Growth Strategy (TDUGS), which Council adopted in May 2024. Its main purpose is to increase housing supply, and its secondary purpose is to provide for industrial growth. Both are to be delivered through planned, coordinated development. PCA does this by rezoning the growth areas the TDUGS identified, which should ease capacity constraints in the existing zones.

37. The ODP has not been developed to manage large-scale greenfield development. PCA therefore adds new frameworks: the Residential (RGDA) and Industrial (IGDA) Growth Development Areas. These frameworks require well-planned development with adequate infrastructure, good stormwater management and good design.

38. The RGDA covers subdivision only, and the existing Residential Management Area provisions continue to manage land use.

39. The IGDA covers subdivision and includes land use rules limiting permitted activities to industrial uses, with a small allowance for ancillary activities. This is intended to prevent non-industrial activities from taking up valuable industrial land.

Growth/District Context

40. Tararua District is projected to grow by about 8.6% over the next 10 years, from 19,050 to roughly 20,981 people under the high growth scenario. Longer term, projections reach about 23,200 by 2053. The over-65 group will rise to about 26% of the population.

41. Growth is expected to concentrate in the towns (57% to 74% urban), mostly between 2025 and 2040. The district is large and mostly rural, with about 95% of its land farmed. Its four main towns are Dannevirke, Woodville, Pahiatua and Eketāhuna. The new Te Ahu a Turanga highway improves transports links to Palmerston North and Wellington.

42. The economy is forecast to grow from about $830 million to $1.208 billion by 2053, with 1,367 additional jobs. The district will need an extra 43 ha of industrial land and 13 ha of commercial land by 2053.

43. Limited vacant industrial land is currently available larger format industrial growth. There is also limited vacant residential land at scale for greenfield development. Without Plan Change A (PCA) there would be no change in residential land supply. PCA is therefore needed to zone greenfield land for housing to provide for anticipated growth out to 2053. More than half of its capacity is expected to be used in the next 10 to 15 years.

Plan Change Areas

44. Each of the four towns has its own geography, that shapes where future growth can be located.

45. **Dannevirke** sits on a flat river terrace, about 60 km north of Palmerston North and 100 km south of Hastings. It is the most linear of the four towns, with residential development stretching nearly 6 km north of the commercial centre.

46. A steep escarpment to the east and gentle landform changes to the north and south contain the town.

47. The wastewater facility is at the southern end, so more development at the northern end would need significant infrastructure upgrades.

48. The most logical expansion is therefore to the west, close to the CBD, which keeps the urban form compact and promotes walking and cycling. Some land between the urban boundary and

Adelaide Road is already developed, and waterways and topography limit the rest. A larger overall area is therefore needed to meet capacity requirements.

49. **Woodville** has a grid layout of about 1.5 km by 1.5 km, with State Highways 2 and 3 meeting in the middle of town. It is well placed to benefit from Te Ahu a Turanga: Manawatū Tararua Highway, which is why the proposed greenfield industrial site is to the west of the town adjacent to the highway.

50. The topography is predominantly flat and therefore, residential expansion is logical to the north, infilling the flatter land within the square formed by Pinfold and Sowry Roads.

51. **Pahiatua** is on a flat terrace beside the Mangatainoka River. It has a compact form, with State Highway 2 running through the centre. Flood hazard areas restrict development to the west and south, and the topography to the east makes efficient suburban development harder. Expansion to the north is preferred because flood and stormwater mitigation is likely to be more economical there. The area also stays close to the town centre with good connectivity. Flood protection and mitigation schemes will be needed wherever the town expands.

52. **Eketāhuna** lies mainly on the valley floor and old river terraces, and the Makakahi River splits it in two. Growth is considered relatively easy to manage, particularly on the western side. Residential expansion can take place on the western flat terrace and possibly to the northeast of the town centre.

53. The growth areas were investigated and developed through the preparation of the TDUGS and assessed each location by weighing:

    a) proximity to existing infrastructure

    b) government policy limits on natural hazards and highly productive land

    c) the landscape's physical limits, especially stormwater and flooding

    d) existing urban form, community facilities and character

54. The selection criteria used was to:

    a) avoid flood areas, or protect against them where necessary

    b) minimise impacts on water supply and wastewater networks

    c) provide space for well-designed, connected communities

    d) minimise the loss of highly productive land

    e) favour a compact urban form

    f) ensure workable topography

    g) avoid land of significant cultural, landscape or ecological value

55. The plan change areas have been substantially modified by historic agricultural and horticultural activities.

56. Infrastructure required within individual subdivisions will generally be provided by developers as part of the subdivision and development process. Where appropriate, Council may also enter into developer agreements or other funding and delivery arrangements with developers for infrastructure required to support development.

Outline of Proposed Change (as notified)

57. PCA involves the rezoning of land to establish new development areas across the four main townships of the District. The purpose of the development areas is to provide additional land to assist in providing for additional housing and industrial development over the next 30 years. The following changes are proposed as part of PCA:

- Rezone existing rural land to residential to create new greenfield residential growth areas in the townships of Dannevirke, Woodville, Pahiatua and Eketahuna for future residential development.
- Rezone existing rural land to industrial to create a new greenfield industrial growth area, to the west of Woodville, for future industrial development.
- Rezone two rural zone areas, containing existing industries being Oringi Business Park and Pahiatua Fonterra Milk Factory, to industrial zone for industrial purposes.
- Introduction of a new development area within the District Plan being the Residential Growth Development Area (RGDA) to establish a new subdivision framework for residential development within these areas. This includes specific objectives, policies and rules addressing the key matters relevant to the RGDA, including enabling housing choice and enabling residential development outcomes within the area.
- Introduction of a new development area within the District Plan being the Industrial Growth Development Area (IGDA) to establish a new subdivision and land use framework for industrial development within these areas. This includes specific objectives, policies and rules addressing the key matters relevant to the IGDA, including enabling industrial growth and industrial development outcomes within the area.

Objectives and Policies

58. PCA introduces objectives and policies specific to DEV01 and DEV02 to guide the form and development of the RDGA and IGDA areas. These provisions complement the existing objectives and policies in the District Plan.

Rules

59. PCA includes area-specific rules and standards to implement the intended form of development within DEV01 and DEV02. These include provisions relating to subdivision, development density and infrastructure considerations. Some provide greater development flexibility than the ODP provisions, while others impose additional requirements to respond to the site-specific characteristics and infrastructure needs within each area.

Overview of Process

Pre-Notification

60. TDC undertook extensive consultation as part of the wider district plan review process and the preparation of the draft district plan and final district plan for consultation. The matters discussed and the feedback received is considered to be relevant and appropriate in the context of PCA in regard to consultation on the key themes in providing for growth within the district.

61. The Council's approach to the District Plan Review centred on early and ongoing engagement in an iterative plan development process. The approach has encouraged engagement with the community throughout the review process, allowing the public to have input on the shape and direction of the Proposed District Plan, before the formal public notification of the Proposed District Plan. The pre-consultation phase is summarised in the s32 report in full.

Notification

62. The Plan Change was notified on 7 September 2026. Submissions were open until 5 October 2026. Submissions were able to be made online through Council's Website, via email or a paper copy.

63. A total of 61 submissions were received, and the summary of submissions were publicly notified on 19 October 2026, with the further submission period closing on 3 November 2026.

64. A total of 9 further submissions were received.

Plan Stop

65. The Resource Management (Consenting and Other System Changes) Amendment Act came into force on 20 August 2025. This Amendment Act introduced a range of transitional measures intended to manage the current planning system ahead of its eventual repeal and replacement of the RMA by the new planning framework proposed through the Planning Bill and Natural Environment Bill.

66. A key feature of this Amendment Act is the introduction of the commonly referred to "Plan Stop" mechanism. This mechanism:

- Requires councils to stop progressing most proposed plans and plan changes where hearings had not commenced by the date the legislation took effect; and
- Allows continuation only where automatic statutory exemptions apply, or the Minister grants an exemption.

67. Under these provisions, Council could not progress its full district plan review unless:

- The relevant parts met the statutory criteria for automatic exemption, or
- The Minister granted an exemption under section 80V RMA.

68. As a Council-adopted plan change that had not been notified and not had a hearing commenced, the full plan review was subject to the Plan Stop. Council therefore could not continue to progress unless an applicable statutory exemption applied or a Ministerial exemption was obtained under Section 80V of the RMA.

69. Council applied to the Ministry for the Environment for a Ministerial exemption in late 2025 to enable Council to separate the growth component of the plan review and prepare PCA, to rezone land with associated planning provisions, to continue to notification.

70. In April 2026, TDC received a full Ministerial exemption that enabled Council to commence preparation of PCA and to proceed through to formal consultation under the RMA.

Statutory Requirements and Strategic Level Documents

Resource Management Reform

71. The Planning Act 2026 and Natural Environment Act 2026 passed into law on 30 September 2026, replacing the RMA through a staged transition to the new resource management system. PCA was initiated and notified under the RMA, and under the transitional arrangements, continues to be determined under the RMA. Accordingly, the statutory assessment in this report is undertaken under the RMA.

Resource Management Act 1991

72. In preparing and considering any plan change there are a number of statutory requirements in the RMA that need to be satisfied. These include:

- Part 2 of the Act comprising:
- Section 5 – Purpose
- Section 6 – Matters of National Importance
- Section 7 – Other Matters, and
- Section 8 – Treaty of Waitangi
- Section 31 – Functions of Territorial Authorities
- Section 32 – Requirements for preparing and publishing evaluation reports
- Section 32AA – Requirements for undertaking and publishing further evaluations

- Section 72 – Purpose of district plans
- Section 73 – Preparation and change of district plans
- Section 74 – Matters to be considered by territorial authorities, and
- Section 75 – Contents of district plans.

73. Of particular relevance to PCA is the function in s31(1)(aa) for Council to establish, implement and review objectives, policies and methods to ensure there is sufficient land for residential development capacity to meet expected demand.

74. I have summarised below the key matters relating to the above requirements that are particularly relevant to this proposed plan change.

75. The purpose of the RMA under s5 is to promote the sustainable management of natural and physical resources. Of particular relevance to PCA, s5(2)(b) includes safeguarding the life-supporting capacity of air, water, soil and ecosystems, while s5(2)(c) requires adverse effects on the environment to be avoided, remedied or mitigated.

76. Section 6(h) of the RMA requires those exercising functions and powers under it to recognise and provide for 'the management of significant risks from natural hazards', while under Section 7 particular regard needs to be had to:

(b) the efficient use and development of natural and physical resources;

(c) the maintenance and enhancement of amenity values;

(f) maintenance and enhancement of the quality of the environment; and

(g) any finite characteristics of natural and physical resources.

77. Territorial authorities have the following obligations for the purpose of giving effect to the RMA in its district, under Section 31, to:

(a) establish, implement, and review 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;

(aa) establish, implement, and review 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; and

(b) control of any actual or potential effects of the use, development, or protection of land, including the avoidance or mitigation of natural hazards.

78. The relevant aspects of the above matters have been considered in the analysis of the submissions and PCA provisions in this report.

National Direction

79. Under Section 75(3)(a) of the RMA a district plan must also give effect to any National Policy Statement (NPS) that has been issued. At the time the plan change was notified, there were several NPS in place. There are all canvassed under the s32 report. The ones of particular relevance to the assessment in this report of proposed PCA are the National Policy Statement on Urban Development (NPS-UD), the National Policy Statement for Freshwater Management 2020 (NPS-FM), and the National Policy Statement for Highly Productive Land (NPS-HPL). Additional national direction that came into force following notification of PCA is addressed further below.

National Policy Statement on Urban Development

80. The NPS-UD took effect from 20 August 2020 and seeks to ensure there is sufficient development capacity to meet the needs of people and communities and recognises the significance of well-functioning urban environments that contribute to community wellbeing and safety. This is directly relevant to PCA as the proposal is to enable the provision of housing in

Tararua District.

81. Tararua District Council is not a Tier 3 Local Authority as it does not contain a single urban environment (population over 10,000) that is not specified as either Tier 1 or 2. Therefore, the Council is encouraged by the NPS to have regard to its objectives and policies. The relevant provisions of the NPS are listed below. I address these matters where relevant in my assessment of housing demand, infrastructure, transport, amenity and other submissions below.

> ***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.*
>
> ***Objective 3:*** *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*
>
> *(a) the area is in or near a centre zone or other area with many employment opportunities*
>
> *(b) the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in*
>
> *(c) the area, relative to other areas within the urban environment.*
>
> ***Objective 4:*** *New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*
>
> ***Objective 5:*** *Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).*
>
> ***Objective 6:*** *Local authority decisions on urban development that affect urban environments are:*
>
> *(a) integrated with infrastructure planning and funding decisions; and*
>
> *(b) strategic over the medium term and long term; and*
>
> *(c) responsive, particularly in relation to proposals that would supply significant development capacity.*
>
> ***Objective 7****: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.*
>
> ***Objective 8:*** *New Zealand's urban environments:*
>
> *(a) support reductions in greenhouse gas emissions; and*
>
> *(b) are resilient to the current and future effects of climate change.*
>
> ***Policy 1:*** *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
>
> *(a) have or enable a variety of homes that:*
>
> - *meet the needs, in terms of type, price, and location, of different households; and*
> - *enable Māori to express their cultural traditions and norms; and*
>
> *(b) have or enable a variety of sites that are suitable for different business sectors in*

terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

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

***Policy 5:** Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of: the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or relative demand for housing and business use in that location.*

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

(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement

(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

- *may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
- *are not, of themselves, an adverse effect*

(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)

(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity

(e) the likely current and future effects of climate change.

***Policy 10:** Tier 1, 2, and 3 local authorities:*

(a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and

(b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and

(c) engage with the development sector to identify significant opportunities for urban development.

***Policy 11:** In relation to car parking:*

(a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and

(b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans

National Policy Statement for Freshwater Management

82. The NPS-FM took effect from 3 September 2020 and replaced the National Policy Statement for Freshwater Management 2014.

83. The NPS-FM is relevant to PCA particularly because urban development and associated stormwater management have the potential to affect freshwater, groundwater and downstream receiving environments.

84. Of particular relevance are the NPS-FM objective and policies relating to Te Mana o te Wai, integrated management of land use and freshwater on a whole-of-catchment basis, including effects on receiving environments, and enabling communities to provide for their social, economic and cultural wellbeing consistently with the NPS-FM. These matters are particularly relevant to my assessment of the proposed growth area-wide approach to stormwater management later in this report.

85. The following objective and policies are of specific relevance to PCA:

> ***Objective***
>
> *The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:*
>
> *(a) first, the health and well-being of water bodies and freshwater ecosystems*
>
> *(b) second, the health needs of people (such as drinking water)*
>
> *(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.*
>
> ***Policy 1***
>
> *Freshwater is managed in a way that gives effect to Te Mana o te Wai.*
>
> ***Policy 3***
>
> *Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.*
>
> ***Policy 15***
>
> *Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.*

National Policy Statement on Highly Productive Land

86. An assessment of the proposed plan change against the NPS-HPL was included in the s32 report. The NPS-HPL came into effect in October 2022 and was amended in December 2025. The overarching purpose of the NPS-HPL is described in its Objective:

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

87. The NPS-HPL defines highly productive land as follows:

> *Land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)'.*

88. The following policies are also considered relevant to PCA:

Policy 1: Highly productive land is recognised as a resource with finite characteristics and long-term 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.

89. The policy framework of the NPS-HPL is clear in its direction when considering the rezoning of Highly Productive Land. In particular, Policy 5 of the document directly relates to the rezoning of highly productive land to urban use, as set out above.

90. Clause 3.6(4) of the NPS-HPL addresses this policy, directing that the rezoning of land can only occur where all the three tests in Clause 3.6(4) are met.

91. Clause 3.6(4) of the NPS-HPL states:

(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.

92. In considering PCA, this report must consider the matters set out in Clause 3.6(4).

93. Furthermore, in addition to Clause 3.6(4), Clause 3.6(5) of the NPS-HPL also states:

Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.

94. Therefore, the above policy context provides the basis for assessing the appropriateness of the rezoning of land from rural to an urban zoning.

95. The PCA area is mapped under the New Zealand Land Resource Inventory (NZLRI) as containing LUC1-3 land. However, at the commencement date of the NPS-HPL, the TDUGS has not yet commenced nor been adopted by Council. On that basis, it does not meet the interim test in clause 3.5(7)(a)&(b).

96. That the productive value of the soil is relevant to the consideration of PCA. Section 5(2)(b) of the RMA refers to the sustainable management purpose of the RMA which includes (amongst other matters) safeguarding the life-supporting capacity of soil.

97. The issue of the impacts of PCA on versatile soils in the district is a matter that has been raised in submissions, and I address this matter further in the *Loss of versatile soils* section of this report.

New Zealand Coastal Policy Statement

98. Under Section 75(3)(b) of the RMA, a District Plan must give effect to any New Zealand Coastal Policy Statement (NZCPS). I do not consider any NZCPS provisions to be directly relevant to Proposed PCA as the plan change area is not within the coastal environment.

Horizons Regional Council One Plan

99. Under Section 75(3)(c) of the RMA, a District Plan must give effect to any Regional Policy Statement. The relevant regional policy statement is contained in Part 2 of the Horizons

Regional Council's 'One Plan' (which comprises a combined Regional Policy Statement and Regional Plan). The provision references below are from the current version of the One Plan, incorporating Plan Amendment 6 which was made operative in March 2026.

100. Chapter 1 of the One Plan identifies four key environmental issues for the region. Their relevance to PCA is summarised below:

Big Four Issues	Relevance to Proposed Plan Change
Surface water quality degradation	• Relevant to the potential effects of urban development and stormwater discharges on groundwater, downstream surface water bodies and receiving environments.
Increasing water demand	• Relevant to the additional potable water demand generated by urban development and the capacity and timing of water-supply infrastructure
Unsustainable hill country land use	• Not directly relevant to the proposed plan change
Threatened biological diversity	• Potentially relevant to freshwater and wetland values and the management of effects on receiving environments, although the plan change area itself has been substantially modified and has generally limited terrestrial ecological values.

101. An assessment of the plan change against key One Plan RPS Objectives and Policies was included in the section 32 report. However, I consider the following provisions are also relevant:

Relevant One Plan RPS Objectives and Policies	Relevance to PCA
Urban Form and Development	
UFD-O1: Strategic planning and urban development Strategic planning for urban development ensures that: 1) *sufficient development capacity** and *land** supply for housing and business uses is provided to support growth, 2) new development, *development infrastructure** and *additional infrastructure** are provided in a coordinated, integrated and efficient manner, 3) the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and 4) competitive *land** and development markets are supported in ways which improve housing affordability. **UFD-O2: Urban growth and rural residential subdivision on *highly productive land**** To ensure that *Territorial Authorities** consider the benefits of retaining *highly productive land** for use as *production land*^ when providing for urban growth and rural residential *subdivision**. **UFD-O3: Urban form and function** The intensification and expansion of *urban environments**: 1. contributes to *well-functioning urban environments** that: a. enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future, b. increase the capacity and choice available within housing and *business land**, c. achieve a quality, sustainable and compact urban form, d. are, or planned to be, well connected by a choice of transport modes including *public transport**, e. manage adverse *effects** on the environment, and f. manage adverse *effects** (including reverse sensitivity *effects**) to	These objectives and policies set the direction for where and how development occurs in the Region including the contribution of development to a well-functioning urban environment, the scale and density of development, provision of infrastructure, urban growth on HPL, and the management of adverse effects of development.

ensure that the operation, maintenance and upgrade of *nationally significant infrastructure**, and physical resources of regional or national importance are not compromised. 2. enable more people to live in, and more businesses and *community services** to be located in, areas of an *urban environment** where: a. it is in or near a *centre zone** or other area with many employment opportunities, b. it is able to be, or is, well-serviced by existing or planned *public transport** and *active transport**, c. there is a high demand for housing or *business land**, relative to other areas within that *urban environment**. **UFD-O4: Urban development and the *Treaty of Waitangi (Te Tiriti o Waitangi)*^** *Planning decisions** relating to *urban environments** take into account the principles of the *Treaty of Waitangi (Te Tiriti o Waitangi)*^. **UFD-O5: Urban development and *climate change*^** *Urban environments** are resilient to the *effects** of *climate change*^ and support reductions in *greenhouse gas*^ emissions.	

UFD-P1: Integration of *infrastructure*^ with *land*^ use *Territorial Authorities** must proactively develop and implement appropriate *land** use strategies to manage urban growth that: 1. for *urban environments**, demonstrate how *sufficient development capacity** for housing and *business land** will be provided in the *short term**, *medium term** and *long term** in a well-planned and integrated manner, and 2. for all settlements, ensure there is co-ordination between the location, form and timing of urban development and the planning, funding, delivery and implementation of *development infrastructure**. **UFD-P2: Providing *sufficient development capacity**** *Sufficient development capacity** and *land** supply is provided for in the *short term**, *medium term** and *long term** to accommodate demand for housing and *business land** in *urban environments** by: 1. providing for urban intensification and urban expansion within *district plans*^ in accordance with UFD-P1, UFD-P4, and UFD-P5, 2. *local authorities*^ being responsive to unanticipated or out of sequence plan changes that would add significantly to *development capacity** and contribute to *well-functioning urban environments** in accordance with UFD-P6, and **UFD-P3: Urban growth and rural residential *subdivision*** on *highly productive land**** In providing for urban growth and controlling rural residential *subdivision** ("lifestyle blocks"), *Territorial Authorities** must pay particular attention to the benefits of the retention of *highly productive land** for use as *production land*^ in their assessment of how best to achieve *sustainable management**.	Policy 1 is particularly relevant as they set the direction for the integration of infrastructure with land use across the region. Policy 2 provides the basis for provided sufficient land capacity to meet and accommodate demand for growth in the region. Policy 3 manages the urban growth under policy 2 with respect to HPL. These matters are all explicitly relevant to the basis of PCA.

UFD-P4: Urban intensification and expansion 1. Intensification and expansion of *urban environments* is provided for and enabled in *district plans* where: a. it contributes to a *well-functioning urban environment*, b. it contributes to a range of residential and business areas that enable different housing and/or business types, *site* size and densities, c. higher density development is in close proximity to *centre zones*, *public transport*, *community services*, employment opportunities, and open space, d. development is well serviced by existing or planned *development infrastructure* and enables provision of *public transport*, and *additional infrastructure* required to service the *development capacity* is likely to be achieved, e. it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character, f. the operation, maintenance and upgrade of *nationally significant infrastructure* and physical resources of regional and national importance are not compromised, and g. it promotes positive *effects*, and gives appropriate priority to the health and well-being of *waterbodies*, *freshwater* ecosystems, and other *receiving environments* where they are potentially adversely affected by urban development, while at a minimum avoiding, remedying or mitigating those *effects* (including cumulative *effects*).	Policy UFD-P4 and Policy UFD-P5 set the direction for where and how development occurs in the Region including the contribution of development to a well-functioning urban environment, the scale and density of development, provision of infrastructure and the management of adverse effects of development.

2. In addition to meeting the criteria in (1) above, the expansion of *urban environments* must only occur where it: a. is adjacent to existing or planned urban areas, b. will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite *land* resource, c. is well-connected along transport corridors and is designed to enable a variety of transport modes, d. in relation to adverse *effects* on existing activities: i. does not compromise (including by way of potential reverse sensitivity *effects)* the operation, maintenance and upgrade of the national grid electricity transmission network, all New Zealand Defence Force *infrastructure*, facilities and assets, and the New Zealand rail network, or ii. to the extent reasonably possible, does not compromise (including by way of potential reverse sensitivity *effects*) the operation, maintenance and upgrade of *nationally significant infrastructure* not referred to in (d)(i) or, iii. if neither (d)(i) or (ii) apply, avoids as far as reasonably practicable, and otherwise mitigates, adverse reverse sensitivity *effects*. 3. *District plans* applying to *urban environments* must enable heights and density of urban form which are commensurate with the greater of: a. relative demand for housing and/or business use in that location, or b. the level of accessibility provided by existing or planned active transport or public transport to areas with community services and employment opportunities. 4. *Local Authority* transport plans and strategies must establish ways to contribute to *well-functioning urban environments* through the provision of	

public transport services and by enabling *active transport*, including its associated *infrastructure*.	
UFD-P5: Built forms *Territorial Authorities* must ensure the form and design of *subdivision*, use and development in u*rban environments* is managed so that overall it: 1. contributes to a *well-functioning urban environment*, 2. provides for a range of housing types and densities and employment choices in a manner that integrates with existing and planned *development infrastructure*, 3. recognises the importance of marae and papakāinga and enables their development, ongoing use and protection from incompatible development and reverse sensitivity adverse *effects*, where existing or planned *development infrastructure* of sufficient capacity is, or can be, provided, and 4. where appropriate, enables development across multiple or amalgamated *properties* to achieve all of the above.	
UFD-P7: Hapū and iwi involvement in urban development 1. *Local Authorities*, in taking account of the principles of *Te Tiriti o Waitangi (Treaty of Waitangi)* in relation to *urban environments*, must enable *hapū* and *iwi* involvement in urban development planning processes, including in decision making where appropriate, and to ensure provision is made for their needs, aspirations, and values, to ensure *urban environments* enable Māori to express their cultural traditions and norms.	Policy UFD-P7 directs the involvement of hapū and iwi in urban development processes, and decision-making where appropriate. Hapū and iwi have been invited to engage at earlier stages of the process as detailed in the section 32 report.

2. As part of making provision for *iwi* and *hapū* needs, aspirations, and values *land* use strategies must be proactively developed and implemented to manage urban development in a manner which: a. has regard to resource management issues of concern to *hapū* and *iwi*, including those identified in any relevant *iwi management plan*, b. enables papakāinga housing and marae, c. enables early and ongoing engagement with *iwi* and *hapū* over urban intensification and expansion, d. ensures *urban environments* enable Māori to express their cultural traditions and norms, and e. identifies and protects culturally significant areas.	
UFD-P8: Urban development and climate change Urban environments are developed in ways that support reductions in greenhouse gas emissions and improve resilience to the effects of climate change by: a. use of urban design, building form and infrastructure to minimise as far as practicable the contribution to climate change of the development and its future use, including (but not limited to) energy efficiency (including methods to ensure whole-of-life energy efficiency), water efficiency, waste minimisation, transportation modes (including use of public transport and active transport) water-sensitive design and nature-based solutions, b. urban development being compact, well designed and sustainable, and	Policy UFD-P8 requires specific consideration of how urban development contributes to reducing greenhouse gases through urban design measures, provision of a compact urban form, access to sustainable transport modes, and the use of water sensitive urban design and nature-based solutions.

c. requiring a risk based approach to their resilience to the impacts of climate change, including sea level rise and any increases in the scale and frequency of natural hazard events. 2. Territorial Authority decisions and controls: a. on subdivision and land use must ensure that sustainable transport options such as public transport, walking and cycling are integrated into land use development, and b. on subdivision and housing, including the layout of the site and layout of lots in relation to other houses/subdivisions, must encourage energy-efficient house design and access to solar energy.	

Operative Tararua District Plan

102. As outlined in section 9.4 of the s32 report, the overarching resource management issues and objectives for the district are outlined under section 2 of the District Plan. These Issues and Objectives establish the intent of the Plan at the strategic level. The strategic approach set out by this section provides a basis and direction for the identification of lower level and more specific resource management issues, objectives, polices and methods for the specific zones in the District Plan.

103. The Objectives that are directly applicable to PCA highlight:

- To encourage the District's urban areas to develop to meet communities' needs in a sustainable manner.
- To ensure efficient and sustainable urban areas.
- To ensure a high level of environmental quality and amenity in the urban areas of the district.
- To maintain the vitality and character of the district's rural areas.
- To provide a flexible and reliable subdivision process which ensures the maintenance and enhancement of environmental quality in the district.
- To promote a pattern of subdivision and land use in the district which results in the efficient use and development of natural and physical resources.
- To ensure that all lots created are suitable for the intended development or use.
- To reduce the risks imposed by, and the effects of, natural hazards on the people, property and infrastructure of the Tararua District
- To maintain and/or enhance amenity values and environmental quality in the district, for present and future generations.
- To protect the natural, scenic, ecological, cultural and amenity values of the district's lakes, rivers, and wetlands and maintain and/or enhance public access to and along their margins.
- To maintain and develop the district's infrastructure to meet the community's needs in a safe, effective and efficient manner while avoiding, remedying or mitigating adverse environmental effects.
- To ensure the safe, efficient and effective operation of the district's transportation networks while avoiding, remedying or mitigating adverse environmental effects.
- To take into account the principles of the Treaty of Waitangi (Te Tiriti O Waitangi) in the management of the district's natural and physical resources.
- To recognise and provide for Maori values in the management of the district's natural and physical resources.

104. The objectives above, and the associated policy direction within the ODP, provide the basis for use and development of land across the district. They are considered to remain relevant to the future development context as they are the engrained strategic direction in the ODP. PCA has been developed in accordance with this policy direction and is considered to be consistent with the outcomes sought here. The provisions of PCA are considered to align with this direction and promote the outcomes sought by the operative plan. Any future development and consenting within the development areas will be considered under this foundation and strategic direction set by the plan.

105. Further, as also outlined in the s32 report, it is noted that the proposed rezonings put forward under this PCA were originally part of the wider full District Plan review commenced by TDC in 2023. The review of the ODP was centred around a complete re-think of the current District

Plan framework. The current District Plan is an 'effects based' plan that was made operative in 2012 at a time of low growth in the district. The Plan sought to encourage development through flexible and non-directive planning rules. However, there have been unintended consequences of this now outdated approach.

106. The District Plan Review concluded that the Operative Plan is not providing for a 'fit for purpose' framework that achieves good development outcomes. Development does not occur in a cohesive and planned way and there are impacts on the natural and cultural environment that require a more integrated approach. The District Plan does not take a strategic approach to how the district is managed into the future.

107. Following the District Plan Review, a new Plan was prepared that focused on:

- A new activities-based planning framework that allows for forward thinking and cohesive planning into the future.
- A National Planning Standards compliant e-plan layout that is GIS driven and accessible to the community.
- A consistent District Plan structure that provides for outcomes focused objectives, directive policies and clear and simple rules.

108. The full District Plan review was in its final stages of preparation when Central Government announced the 'Plan Stop' mandate for Local Government. This prevented the full plan review process from proceeding in its current form.

109. PCA has arisen out of an exemption application to the Minister seeking to enable the rezoning of additional land in the district to provide for growth as put forward in the TDUGS. The basis for this exemption was that the primary focus of PCA, being to rezone land to provide development capacity across both the residential and industrial sectors, was imperative as no current land supply/capacity exists in these areas. PCA is in line with Central Government direction to provide for ongoing growth over a 30-year period. It is emphasised that no vacant residential, or industrial land, is present at scale within the district. Therefore, there is a priority need to rezone land to meet the projected growth rates outlined by the TDUGS.

110. The exemption application was granted to TDC, by the minister, which has provided the scope of PCA, as outlined above.

111. PCA must be assessed within the wider framework of the ODP. The RGDA and IGDA-specific provisions do not operate in isolation and, except where the proposed provisions expressly provide otherwise, the relevant district-wide and Residential/Industrial Zone provisions will continue to apply. I have therefore considered both the proposed provisions of PCA and the relevant existing ODP objectives and policies in assessing the submissions and recommended amendments.

112. The s 32 report identifies the overarching objectives of the ODP which establish the intent of the plan at a strategic level, and which provide a framework for the more specific objectives which guide development in each specific zone.

Procedural Matters

Late, withdrawn and other procedural matters relating to submissions

113. Two late submissions were received on PCA:

a. S56 – Georgina Morrison

b. S57 – Peter Raikes

114. It is also unclear as to whether the following submissions were received in time as they were delivered to a satellite Council service centre and were delivered to Council's main office after the closing date:

a. S58 – Ian Mollison

b. S59 – Kirsty Silvester

c. S60 – Peter & Wendy Jaspers

d. S61 – Kylee Jope

115. The following further submission was also received late:

a. FS9 – Sue Giddens

116. Under s 37 of the RMA, the Hearing Commissioner has the power to decide whether or not to waive a failure to comply with a set timeframe. The Commissioner can decide to waive the failure to comply with a timeframe only after taking into account:

a. the interests of any person who, in its opinion, may be directly affected by the waiver;

b. the interests of the community in achieving adequate assessment of the effects of the Plan change; and

c. its duty under s 21 of the RMA to avoid unreasonable delay.

117. In considering whether to accept or reject the late submissions, the Hearing Panel may wish to take into account the following:

a. The late submissions were received within 7 working days after the close of the submission period.

b. All late submissions were included in the notified Summary of Decisions Requested.

c. No prejudice or time delay has arisen as a result of the late submissions.

118. I recommend that the failures to comply with the timeframe for making a submission can be waived as:

a. No person would be directly affected by the waivers;

b. The waivers would not affect the assessment of the Plan change; and

c. The waivers would not result in any prejudice or delay to the Plan change process.

Provisions Supported and Not Opposed

119. The proposed rezoning of the Oringi and Pahiatua Fonterra IGDA's only received submissions in support (S1 and S51 respectively). I have considered these provisions in the context of PCA as a whole and do not consider that any amendments are required, except for any consequential or minor drafting amendments identified elsewhere in this report. I therefore recommend that these submissions in support be accepted and that the relevant provisions be retained.

120. Where submissions are in support of the plan change and seek relief requiring that the text in PCA, as notified, be retained, I have considered these provisions in the context of PCA as a whole and do not consider that any amendments are required, except for any consequential or minor drafting amendments identified elsewhere in this report. I therefore recommend that these submissions in support be accepted and that the relevant provisions be retained.

Discussion and Analysis of Submissions

121. This section discusses the matters raised in submissions. To assist with the evaluation, the submissions have been grouped according to the following relevant topics, and where necessary, into further sub-topics:

122. Under each topic, I summarise the issues raised in submissions. In the analysis section, I discuss the matters raised with reference to the relevant ss74 to 76 matters, including any relevant statutory context, the supporting technical reports and additional evidence provided

by the Council's technical experts.

123. An evaluation of the recommended changes in accordance with s32AA, where necessary, is provided later in this report.

124. Where I have recommended changes to PCA I have used the following conventions:

    a. Recommendations to insert additional text to the proposed notified provisions are shown in bold, underlined and with grey shading (**Example**)

    b. Recommendations to delete text from the proposed notified provisions are shown in bold and struck through with grey shading (~~**Example**~~).

125. Recommendations to the Hearing Commissioner on whether to accept or reject, either in full or in part, individual submission points and any requested amendments to PCA are then outlined. A table of the original submission and further submission points, along with my recommended decisions and a reference to where this point is evaluated in the report, is set out in Appendix 1 of this report.

126. Each submission and further submission point has a unique identifier (e.g. S5) with the first number referring to the submitter and the second number to the submission point. Further submissions follow a similar format, but with the additional prefix of 'FS' (further submission). For example, FS1.

Preliminary Matters

Relevant Submissions

S49, S50, FS7, FS8

127. Whether the PCA provisions extend beyond the intended scope of the Ministerial Exemption for PCA.

128. Submissions S49 and S50 raise concerns over the scope of PCA to introduce a new planning framework alongside the proposed rezonings. Further, the submissions state that the submitter believes this to be outside the scope of the 'plan stop' exemption received from the Minister.

129. The submissions also raise that the provisions in DEV01 and DEV02 are now outside the scope of what can be considered for district land use consenting as a result of recent amendments to the RMA. This extends to the assessment and information requirements that are proportionate to the particular development.

130. The submissions request that DEV01 and DEV02 be deleted, or a full redrafting of the proposed provisions, if it is deemed that DEV01 should remain. The submitters raise that they believe there is insufficient evidence to suggest that the ODP provisions under the Residential and Industrial Management Areas are inadequate to manage the future development of the growth areas.

Analysis

131. PCA commenced after Ministerial exemption was granted to the Council on 8 April 2026. An application was made to the minister to progress with a growth targeted plan change after the 'Plan Stop' rules introduced in late 2025 prevented the wider full district plan review from proceeding.

132. The application to the minister sought a decision to allow a plan change to proceed that provided for growth in Tararua via the rezoning of land with associated provisions to manage the development of such areas. The exemption was granted in full and the preparation of PCA commenced. The application to the Minister included commentary on the plan change including both proposed rezonings and associated provisions. The exemption was granted in full on this basis.

133. The provisions within DEV01 and DEV02 have been specifically developed to be added to the ODP to provide a subdivision framework for both the RGDA and IGDA growth locations. The section 32 report clearly identifies the purpose of these provisions and the need for them in the

context of the ODP and s32 of the RMA.

134. It is noted that during the notification process, the RMA was amended to introduce new procedural principles (s18B RMA) and matters now out of scope (s104(1A) RMA) for consent planning. The submissions (S49 and S50) suggest these changes have resulted in a need for the provisions of PCA to either be deleted or redrafted. I disagree with this position. The planning provisions seek to ensure that any development within the newly zoned areas achieves both good outcomes and occurs in a coordinated manner. This is demonstrated through the s32 report.

135. There are no matters within either DEV01 or DEV02 that contains matters that are identified within the new s104(1A) of the RMA. Therefore, I reject that this requires change to the proposed provisions.

136. In regard to the s18B matters, it is acknowledged that this amendment is to guide consent planning and ensure that Council decision makers operate in a pragmatic and practical manner. This is considered to reinforce and further support the application of the PCA provisions to future applications. The assessment and information requirements as part of the Restricted Discretionary Activity (RDA) pathway for subdivision within either the RGDA or the IGDA is intended to be applied with discretion depending on the scale and intensity of the application before Council.

137. The proposed framework is intended to ensure that the critical matters to subdivision and development are addressed up front as part of an application. This is to ensure that any necessary factors, for example stormwater management (addressed further later in this report), are highlighted early and any requirements incorporated into the proposal at an early stage.

138. The changes to s18B will help ensure that Council, when considering future applications, will determine the level of information and or assessment required for an application depending on the size and scale of that application. The RDA pathway affords the processing planner with the ability to apply discretion to the specific application based on the merits of such application. It is acknowledged that some proposals will require more scrutiny that others, and the provisions have been prepared with this in mind to provide the necessary planning mechanisms to manage future subdivision and development.

139. The existing ODP provisions are not considered adequate in this regard as the current framework is outdated and not appropriate to apply to new greenfield development as outlined in the s32 report. The submitters suggest that there is not enough justification in the s32 to confirm this.

140. I disagree with this point that there is not sufficient justification for the provisions of DEV01 and DEV02 to be included in the plan. The s32 report demonstrates that the objectives of the proposal are the most appropriate way to achieve the purpose of the Act, and also the efficiency and effectiveness of the proposed provisions for achieving those objectives.

141. The ODP framework provides for the majority of subdivision to be considered as a Controlled Activity. Where any non-compliances are present, these applications then move to a full Discretionary Activity status. This is not considered to align with current best practice, as the national planning standards direction signals that controlled activities will begin to be phased out, and also is not considered to be the most efficient or effective option as outlined in the s32. Review of previous resource consents (as part of the s32 process) highlighted that it was very difficult to achieve good design outcomes and ensure the necessary matters were adequately addressed through the Controlled Activity pathway.

142. The intent of the PCA provisions is to provided clear guidance to both applicants and consent planners, as to the specific matters that are to be addressed and considered as part of future applications. Thus, providing the regulator with adequate planning mechanisms to ensure the development of land in manner that achieves the objectives of the plan and is in line with the purpose of the RMA.

Recommended Decision

143. For the reasons outlined above, I do not consider there to be any scope concerns that provide

a basis for either the plan change as a whole, or specific parts of the plan change to not proceed.

144. I recommend rejecting the submissions (S49 and S50) insofar as they seek the provisions within DEV01 and DEV02 be deleted or amended.

Whole Plan Change and General Matters

Relevant Submissions
S3, S6, S7, S8, S13, S15, S16, S17, S18, S19, S20, S21, S29, S31, S35, S37, S44, S53, S54, S55, S61

145. S10 and S11 indicate support in part for the whole plan change but requests further detail be provided in regard to stormwater management and flood risks (this matter is addressed further later in this report). S40 and S48 also indicates support in part for PCA requesting that costs be kept to an acceptable level and that their submissions inform any final decisions.

146. Several submissions oppose the plan change in full, raising concerns with the change from rural to urban, introducing tract housing that will result in an adverse impact on the existing natural landscape. S6 opposes the plan change in full due to the impact on the submitter's property rights. S55 also opposes in full due to rates implications, no benefits to the landowners, and no existing infrastructure in place. The submitters request that the plan change be declined.

147. S13 opposes the plan change in full citing that the growth projections scenario that has been adopted is too high, in particular for Eketāhuna. The submitter considers that planning for future growth should occur and requests that this be implemented in a phased manner.

148. S25, from the Natural Hazards Commission, supports the plan change in part and seeks that the growth areas be retained and the provisions be amended as per the suggested amendments contained within the submission.

149. The remaining submissions oppose the plan change in full however, raise matters specific to a particular element of the plan change.

Analysis

150. I acknowledge the concerns raised regarding rates implications and property rights. However, I consider these to fall outside of the consideration of the plan change. Rates implications, whilst a possible consequence of the plan change, is not a matter that is for consideration under the RMA and therefore is disregarded here.

151. Regarding property rights and existing use rights, landowners within the growth areas will be able to continue their current, lawfully established, activities following any potential rezoning. There is no mechanism in the plan change that requires these activities to cease, and existing use rights, as provided for in the RMA, will be afforded to all landowners.

152. I note the submission points regarding the keeping of animals, which is a matter governed by the Council's Keeping of Animals Bylaw 2024 (attached as appendix 5). As far as I understand, the current bylaw wording is linked to the zone and will impact land that changes from a rural zone to a different zone, such as residential. Given this issue, Council has confirmed that upon any zoning changes resulting from PCA, it will amend the Keeping of Animals Bylaw, to account for existing use rights. A Council resolution will be made following the outcome of this process.

153. The above matters are also considered individually below.

154. The submissions in opposition raise matters that are limited to specific parts of the plan change, that are addressed throughout this report. I do not consider there to be any matters in the submission that would warrant the plan change to be declined in full.

Recommended Decision

155. I recommend accepting the relief sought insofar as the submitters support the plan change and request approval of PCA.

156. The matters raised in the submission that relate to stormwater management are addressed later in this report including a recommendation.

157. The submissions seeking that the plan change be declined in full are rejected as there is not considered to be any grounds for the full rejection of PCA.

Infrastructure Capacity Constraints and Costs

Relevant Submissions
S2.2, S5.3, S8.2, S10.2, S11.2, S13.2, S18.4, S19.2, S20.2, S27.2, S28, S29.2, S32.2, S33.2, 34.2, S35.2, S37.2, S40.2, S43.4, S47, S52.2, FS8, FS9

158. Several submissions raise concerns with the level of infrastructure provision and capacity, in particular wastewater capacity, to support future growth. The relief sought includes not rezoning specific elements of the proposal. In several instances, the submissions note that there is no current infrastructure provision within the areas proposed for rezoning. Relief seeks further information to be supplied regarding infrastructure capacity before the plan change proceeds.

159. The submissions also raise that the current infrastructure levels of service are not 'set-up' for future growth and cite that areas on the edge of town have aged infrastructure. Submissions also highlight that no footpaths are also located within these areas.

160. The submitters raise concern with the funding mechanisms and cost of providing infrastructure to the growth areas. Concern is also raised regarding ratepayers bearing the cost of infrastructure to enable growth and that the amount of investment required is significant.

Analysis

161. It is acknowledged that in most cases, there is no three waters infrastructure within the proposed development areas. This is common and synonymous with areas zoned Rural in the Tararua District. Some instances may occur where there is water supply within the rural areas; however, this is not at scale and Council's current policy is to not allow for new connections to rural allotments. Any existing cases where water supply is present is a legacy occurrence.

162. The plan change has been prepared with two key anchors in mind, these are:

1. Proximity of the growth area to the existing urban edge.
2. Inclusion of specific planning provisions to ensure that adequate infrastructure provision is made before development can occur.

163. These considerations have provided the basis for proceeding with the development areas as part of PCA from an infrastructure perspective. Particularly, each of the RGDA areas are located at the urban fringe of their respective townships in order to promote the extension of existing infrastructure networks in the most efficient and effective manner.

164. The position taken by Council is that the plan change, and associated rezonings, will provide the basis to inform and undertake growth planning from an infrastructure standpoint. There has been no intention from Council to undertake this process prior to and rezonings occurring.

165. As Tararua has not had greenfield areas, signalled for growth, in recent times (or historically), there is no current growth funding included in Council's LTP to enable infrastructure investment in the areas currently.

166. Therefore, following the outcome of the plan change, growth planning from an infrastructure standpoint will need to occur that includes upgrade plans, phasing and funding for the growth areas.

167. The technical reporting appended to the s32 report demonstrated that there are feasible infrastructure solutions to enable development within each of the areas. The evidence of Mr

French, appended to this report, addresses this matter in more detail.

168. It is further noted that the concerns raised by submitters in relation to infrastructure capacity are acknowledged. I rely on the evidence of Mr French, who responds to these matters directly.

169. It is considered that, given the lead time between rezoning and development generating demand on the networks, the necessary water supply and wastewater capacity is able to be available when required. However, this conclusion does not depend on the required upgrades being completed before subdivision occurs. As discussed below, if sufficient capacity is not available, the proposed subdivision provisions enable the timing and staging of development to be managed so that it aligns with available infrastructure capacity.

170. Proposed subdivision within both DEV01 and DEV02 requires resource consent for subdivision as a restricted discretionary activity, with the provision of servicing including water supply and wastewater being a matter of discretion. This approach enables the Council to assess available network capacity at the time subdivision is proposed, and where necessary, impose conditions or control the timing and staging of development so that it aligns with capacity available within the water supply and wastewater systems. If adequate servicing cannot be demonstrated, Council can also decline consent if necessary.

171. Therefore, I do not consider the absence of current wastewater capacity requires PCA to be declined or deferred. In my opinion, the relevant issue at the rezoning stage is whether there is a credible pathway to provide the necessary infrastructure and an appropriate regulatory mechanism to prevent development from occurring ahead of available capacity. Based on the evidence of Mr French and having regard to the subdivision components of the proposed provisions, I consider both requirements are met.

172. I also acknowledge concerns regarding the allocation of infrastructure costs between development and existing ratepayers. Infrastructure within individual subdivisions will generally be provided by developers, while wider network upgrades are funded and delivered through Council's infrastructure and Long-Term Plan processes. Future development levies will also enable the infrastructure providers to fund public network and bulk infrastructure required to support growth. This includes infrastructure upgrades required for roading, wastewater, water supply, and stormwater management.

173. Accordingly, development that occurs following rezoning is likely to be required to pay development levies at the time a service connection is requested. It is noted that the Government has been introducing amendments to the existing development contributions approach with the intent to replace it with a development levies system. The development levies system is expected to provide greater flexibility for Councils and water organisations to charge developers for the costs of infrastructure to service growth including water supply, wastewater, stormwater, transport, reserves, and community infrastructure. Levies will be proportionate to the contribution of the development to overall growth infrastructure costs. The Local Government (Infrastructure Funding) Amendment Bill is being prepared to enable this change and is expected to be introduced in early 2027.

174. Council’s planned infrastructure upgrades respond to a combination of existing network constraints and resilience and level-of-service requirements. The timing and location of development will affect when particular growth-related infrastructure is required and the extent to when development contributes to these costs.

175. As discussed throughout PCA, Council is planning for continued district growth. I do not consider that uncertainty regarding the precise timing or allocation of future infrastructure expenditure provides, in itself, a resource-management basis to decline the rezoning where development can be staged to align with available servicing capacity.

Recommended Decision

176. I recommend rejecting the submissions insofar as they raise infrastructure concerns for PCA that should prevent it from proceeding.

Stormwater Management and Flood Risk

Relevant Submissions

S4.2, S10.1, S11.1, S15.2, S16.2, S18.2, S19.3, S20.3, S21, S23.2, S27.3, S35.1, S37.3, S40.3, S43.6, S44.2, S58, FS3, FS6, FS9

177. Several submissions raise concerns with regard to stormwater issues within the development areas as they currently stand. In particular, concerns are raised across all RDGA's with respect to localised ponding, drainage and flooding concerns. Relief sought includes ensuring adequate consideration is given to stormwater matters before the plan change proceeds.

178. A major concern is that there is already a stormwater issue as there is no stormwater provision to get rid of excess water within the areas. In heavy rain events, some properties receive surface water from both the road and from the adjacent rural land proposed to be rezoned. This is mainly as a result of no curbing within road corridors and land being below the level of the road by a considerable amount.

179. Increasing the number of houses, and consequently the volume of stormwater runoff, could place further pressure on an already inadequate system. It is important that existing drainage issues are properly investigated and addressed before significant additional housing is approved or constructed. Residents should not be expected to accept an increased risk of flooding.

180. Concerns are also specifically raised in regard to the presence of the Tapuata Stream within the Dannevirke RGDA. Council's flood-map information also recognises flooding, poor drainage and surface ponding as matters that may require further investigation before subdivision or new land uses occur. Existing infrastructure is also noted as not being able to cope with current stormwater flows.

Analysis

181. The PCA documentation and prior work undertaken as part of the TDUGS process, included extensive consideration of stormwater management matters and the need to ensure stormwater is appropriately managed as part of any future development. It is also acknowledged that at this stage, the areas are zoned rural and no stormwater or flood management intervention has occurred within these proposed development areas.

182. As notified, the proposed provisions within PCA seek to manage stormwater through requirements including stormwater management plans, and the establishment of stormwater infrastructure that also considers the relevant AEP events (including allowance for climate change) and matters of discretion addressing adjacent and downstream effects and integration with wider stormwater management.

183. The report of Mr French also responds to these matters directly and I rely on his evidence in that regard.

184. It is considered that, given the lead time between rezoning and development generating demand on the networks, the necessary stormwater infrastructure can be made available when required and incorporated into future development plans. However, this conclusion does not depend on the required upgrades being completed before subdivision occurs. As discussed below, the proposed subdivision provisions enable the timing and staging of development to be managed so that it aligns with the provision of stormwater infrastructure.

185. Proposed subdivision within both DEV01 and DEV02 requires resource consent for subdivision as a restricted discretionary activity, with the stormwater management being a matter of discretion. This approach enables the Council to assess all stormwater, and flood risk matters at the time subdivision is proposed, and where necessary, impose conditions or control the timing and staging of development so that it aligns with the required stormwater management measures as part of the respective development. If adequate solutions cannot be demonstrated, Council can also decline consent if necessary.

186. I therefore do not consider the absence of current stormwater infrastructure requires PCA to

be declined or deferred. In my opinion, the relevant issue at the rezoning stage is whether there is a credible pathway to provide the necessary responses to the issue and an appropriate regulatory mechanism to prevent development from occurring ahead of available solutions. Based on the evidence of Mr French and having regard to the subdivision components of the proposed provisions, I consider both requirements are met.

187. As outlined above, flood risk and ponding has been considered in relation to the preparation of PCA. It is considered that flood risk can be appropriately mitigated through future subdivision, development design and site-specific engineering responses. Detailed investigation and appropriate mitigation can occur as part of subsequent subdivision and development proposals.

188. I consider there is sufficient information to determine PCA at the rezoning stage. The evidence does not establish the final form of the stormwater system, and further technical investigation is required. However, the remaining uncertainty relates to detailed configuration and performance requirements of that system rather than whether stormwater can practicably be managed on the site.

189. Importantly, the recommended provisions require the outstanding investigations and integrated design work to occur before any subdivision occurs. In my opinion, this appropriately manages the risk associated with the remaining uncertainty and provides a more robust basis for addressing potential stormwater and flood risk concerns.

190. I consider that any detailed subdivision design will be required to provide more detail about how stormwater will be managed across the development area in a catchment context, not only on an individual property basis, and treatment of stormwater will be required prior to discharge.

191. I also highlight that all proposed rezoning areas are currently zoned rural and contain little or no stormwater management interventions. The matters experienced by the submitters are based on the current situation. As highlighted above, interventions will alleviate stormwater concerns and will be required at every point along the development pathway for the areas.

192. It is highlighted here that this will also ensure that any ecological effects on the receiving environment will be managed. I consider this approach is consistent with the relevant freshwater direction in the NPS-FM and One Plan, which emphasises integrated management of land use effects and the maintenance or enhancement of freshwater quality.

193. I do not consider any amendments are required to the stormwater provisions of PCA.

Recommended Decision

194. I recommend rejecting the submissions insofar as they raise infrastructure concerns for PCA that should prevent it from proceeding.

195. I recommend accepting the submissions insofar as they raise infrastructure concerns for PCA that should be addressed prior to it proceeding based on these having been addressed above.

Loss of Versatile Soils

Relevant Submissions

S19.5, S23.3, S33.3, S34.3, S43.2, S48.2

196. Several submissions oppose the plan change on the basis of loss of versatile soils. These submitters either seek the plan change be rejected, or further information provided, for the following reasons:

- the NPS-HPL has not been adequately considered, and it is unclear whether alternative locations have been considered to balance the NPS-HPL and NPS-UD requirements.
- the rezoning proposal will not meet the requirements to protect the LUC1-3 land that is subject to the proposal.

197. Some submitters understand that some of the proposed urban rezoning on LUC 3 land is exempted from being recognised as HPL under clause 3.5(7)(iii) of the NPS-HPL. The remaining LUC 3 land is subject to clause 3.6(5) of the NPS-HPL, and the LUC 2 land is subject to clauses 3.6(4) and 3.6(5) of the NPS-HPL.

198. In particular, Horizons notes that the proposed residential rezoning extent in Woodville, Pahiatua, and Eketāhuna significantly exceeds the residential demand-supply gaps identified in the Tararua District Land Assessment. The Section 32 Report is not considered to provide additional information demonstrating how PCA meets the requirements of clause 3.6(5) of the NPS-HPL. Additionally, neither the s32 report nor the Tararua District Land Assessment identifies the industrial land capacity requirements necessary to inform the NPS-HPL assessments.

199. it is acknowledged that while the s32 report addresses the assessments against clauses 3.6(4)(a) and 3.6(4)(b) of the NPS-HPL, Horizons considers that the assessment against clause 3.6(4)(c) needs to be more detailed to demonstrate that the requirements of this clause are met.

Analysis

200. I acknowledge the submissions raising concern with PCA because of the loss of versatile soils and raising the application of the NPS-HPL.

201. I have addressed the statutory application of the NPS-HPL earlier in this report and also at length in the s32 report. As set out in that assessment, it is considered that the NPS-HPL provides a clear pathway for the rezoning of rural land for urban purposes.

202. That conclusion does not mean that the productive value of the soil is irrelevant to the consideration of PCA. As discussed, in the s32 report there are factors relevant to each of the growth locations that provide a basis for passing through the test in clauses 3.6(4) of the NPS-HPL.

203. I do not intend to repeat the s32 analysis, relevant to the NPS-HPL, here but instead for brevity intend to reinforce the main points and add further commentary on these matters.

204. A District Plan must be prepared ‘in accordance with’ and ‘give effect’ to an NPS. In this instance, the core objective of the NSP-HPL is that highly productive land is protected for use in land-based primary production, both now and for future generations.

205. To achieve this objective the NPS-HPL directs councils on how to map highly productive land, and manage the subdivision, use and development of this non-renewable resource. Policy 5 directs that the urban rezoning of highly productive land is avoided, except as provided for in this National Policy Statement.

206. Clause 3.6 - Restricting Urban rezoning of highly productive land, states:

(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.

AND

(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.

207. It is here that I reinforce the assessment included in the s32 report that directly addresses these clauses from the NPS. However, in response to the points raised in the submissions, I provide the following as additional assessment.

208. In the case of each location proposed for either Residential or Industrial zoning, there are a number of contributing factors that exist that prevent the highly productive land from being available for use in land-based primary production, both now and for future generations. These constraints are to be considered in parallel to the need to provide for growth and the benefits of the growth from a social, cultural and economic perspective.

209. Social benefits of the proposed rezonings include:

- Opportunity to enhance local village connectivity, both within the village itself and to local amenities.
- Opportunity to enhance the sense of community in each township through provision for growth and investment in local facilities.
- Provide additional opportunities for residents from both within Tararua and beyond, to relocate and find necessary living opportunities where supply is currently low.
- Maintain a compact form through containing the community within a compact urban form which maintains a sense of place and community feel.

210. Cultural benefits of the proposed rezonings include:

- Contains land for urban growth within areas adjacent to existing urban development.
- Provides mechanisms to ensure stormwater and water quality are adequately managed through development.
- Opportunities for local iwi to engage and be included in the development process.
- Additional housing supply for members of the local Rohe to obtain housing opportunities.

211. Economic benefits of the proposed rezonings include:

- Avoids ad-hoc development through current permissive planning pathway under the ODP.
- Contains development within a compact urban form providing for efficient and cost-effective infrastructure extensions.
- Provides certainty to the market on the suitable areas for development within the district.
- Fills the current gap in land supply for both residential and industrial purposes.
- Enables infrastructure providers to coordinate growth planning and investment to ensure infrastructure networks can match growth demand.

212. Constraints within these areas include:

- Existing land parcels, to be rezoned residential, are fragmented and located within an existing roading network and do not form part of any larger contiguous rural holdings utilised for land based primary production.
- The Oringi and Pahiatua IGDA's encompass existing land use activities that are well-established on the sites and are historic activities provided for in these locations.

213. In addition to the above, whilst it is acknowledged that the IGDA proposed for Woodville does not possess many land constraints, the inclusion of the site is in direct response to a need for additional industrial land in the District.

214. The evidence of Mr Killian Destremau identifies the economic basis for providing for additional industrial land. This evidence is relied upon here when forming a conclusion on the spatial

extent of land to provide the development capacity for industrial growth.

215. The Woodville site has specifically been identified due to its location, flat topography, and roading connection to the State Highway network and adjacent districts. This location was investigated and concluded upon the TDUGS process whereby it was determined to be best positioned to provide for industrial growth.

216. In regard to cl.3.6(5), it is reinforced that the spatial extent of the areas included in PCA are deliberate and have been formed with this clause in mind. Whilst it is acknowledged that overall, the supply of land included in this plan change, is at the higher end of the projections, this has been put forward due to multiple factors, including:

- Currently, no greenfield land exists for neither housing and/or industrial growth thus, without PCA, no growth is provided for.
- The assessment of the Land Use Capability (LUC) classification, in the s32, of the soils contained within the flat areas adjacent to the existing residential areas is such that all land suitable for development, contains HPL.
- The use of the land in a productive capacity is considered limited due land fragmentation, soil qualities, and economic viability of the landholdings.

217. The spatial extent in this instance is considered acceptable within the context of the NPS in this case based on all the factors outlined above. In addition, the following impacts are highlighted if the areas are reduced in size:

- Each township does not receive adequate growth provision as areas either have to be reduced as a whole, or alternatively, specific areas reduced.
- Reduced areas provide challenges when undertaking infrastructure planning and achieving viable areas for investment.
- Insufficient land is provided to enable the market to adequately respond to growth.
- There is a risk that small pockets of rural land will remain within the current boundaries identified for growth if the areas are reduced in size. This is not considered to represent a good outcome as it would create localised reverse sensitivity issues and well as a number of new rural/residential boundary interfaces.

218. It is also highlighted here, that whilst not directly relevant to the consideration of PCA, the spatial extent of the rezonings within PCA was presented to the Minister as part of the exemption application. It was here that the plan change was considered to align with Central Governments criteria as is related to housing choice and supply across the country.

219. Furthermore, the evidence of Mr Destremau demonstrates and reinforces the growth and economic context for the district. He concludes that it is clear that the district is expected to experience growth over the 30-year timeline for both residential and commercial/industrial growth.

220. Based in the assumption that there is little to no vacant residential/industrial provided within the district (at scale), additional zoned land is required to meet these needs. It is demonstrated that the district is well positioned to experience growth and attract investment. Therefore, additional supply will need to be provided in sufficient quantities to respond to the projected growth. Enough capacity would need to be provided to attract demand, signal supply to the market to invest for the long term across Dannevirke, Woodville, Eketāhuna, and Pahiatua as well as rural Tararua.

221. This presents a significant opportunity for the district whereby the potential growth and investment presents a number of economic benefits to the district. As demonstrated in the technical information appended to the PCA documents, the district as a whole contains significant amounts of highly productive land. The land contained within the plan change areas, represents only a small proportion of the wider resource. In this context the loss of soils is considered to be minor with the potential benefits considered to significantly outweigh the loss

of rural land and the costs associated with that.

222. PCA is therefore, a direct response to the need to provide for growth within Tararua District.

Recommended Decision

223. I recommend rejecting the submissions insofar as they raise concerns for PCA that should prevent it from proceeding.

224. I recommend accepting the submissions insofar as they raise concerns for PCA that should be addressed prior to it proceeding based on these having been addressed above.

Matters relating to Woodville IGDA

Relevant Submissions

S12, S14.1, S23.1, S24, S31, S33.1, S34.1, FS4, FS5

225. Several submissions (S12, S24, S31, S33 and S34) oppose the inclusion of the Woodville IGDA. The submissions raise that the existing site is rural land that should be retained and not taken up by industry. Other matters include the introduction of industry in this location and the impact on existing landowners, including reverse sensitivity, noise and air pollution, visual outlook and land values.

226. S33 and S34, in particular, consider there to be insufficient evidence of demand for the area and argues that the rezoning is aspirational. The submission highlights that the IGDA rule prioritise industrial development and will constrain existing rural land uses.

227. S14 is in support of the Woodville IGDA and cites that the proposed area "has an important strategic role as a feeder into Te Utanganui – the Central New Zealand Distribution Hub. Te Utanganui is being developed as a nationally significant freight and distribution network, connecting road, rail, air and port infrastructure across central New Zealand."

228. The submission also outlines that the industrial area is well positioned in proximity to the state highway and enables future business to connect into existing established networks. The submission also outlines a number of additional benefits that the IGDA in this location has in regard to meeting future demand.

229. S23 also submits in support of the Woodville IGDA, however, seeks to extend it to the submitters landholding to the south on the opposite side of the state highway and seeks relief as such. The submitter considers this to be a 'logical extension' of the IGDA and resolves zoning and access issues in this location. This matter is considered separately below in this report.

Analysis

230. The inclusion of the Woodville IDGA has been considered within the s32 report and also the evidence of Mr Destremau. Also appended to Mr Destremau's evidence is a study completed by BERL addressing the long-term economic forecasts for Tararua, with a particular lens on industrial growth and additional land supply required.

231. This report demonstrates that there is projected industrial growth over the 30-year horizon and that additional land is required to meet such growth. This work was completed by BERL to support the development of the TDUGS and to inform the provision of additional land for industrial purposes.

232. The specific location of the provision of a 'greenfield IGDA' was addressed through the TDUGS process. PCA is an implementation of the recommendations in the TDUGS. The TDUGS cites the proximity of the location to key transport networks and the wider industrial growth demand context for the region. This is reinforced by the matters raised by CEDA in S14. Council is thus, seeking to provide additional industrial land to not only meet the project demand, but also attract new investment and jobs to the district.

233. With respect to the points raised regarding the proposal constraining underlying land use

activities, as highlighted in the s32 reporting and elsewhere in this report, existing uses will maintain existing use rights and will be able to continue. It is also noted that the majority of landowners within this IGDA, have submitted on PCA. There is no mechanism in the plan change that requires landowners to either sell or relocate from their property. The change in zone is a signal to the future of the land and controls what future activities may establish there.

234. Council is not a developer and the development of land within all of the PCA development areas will be driven by the private sector. It is not until a party with the intention of developing the land, that the land will be developed. What PCA does in this instance, is signal a change over time for the land.

235. Further, the loss of productive land in relation to this area is covered by the 'loss of productive land' assessment above I this report.

Recommended Decision

236. I recommend rejecting the submissions insofar as they raise concerns for PCA that should prevent it from proceeding.

Matters relating to Oringi IGDA

Relevant Submissions

S1

237. Only one submission (S1) was received regard this component of the plan change and is in support of this areas inclusion in the plan change. The relief sought is that the Oringi IGDA be retained.

Analysis

238. No analysis is required in this instance

Recommended Decision

239. Accept the submission in full.

Matters relating to Pahiatua IGDA

Relevant Submissions

S51

240. Fonterra (S51) was the only submitter on the component of PCA and supports in part the proposal to rezone the land to IGDA.

241. The submitter does raise a number of minor points that it seeks relief for in regard to its support for the change. Fonterra supports the over approach taken by PCA and seeks amendments to the proposed IGDA provisions to better reflect and support the current operations on the site while also providing for future development opportunities.

242. The detailed breakdown of the relief sought is located within Appendix 1 of the submission. The submission seeks minor wording changing to the IGDA section of the plan change to incorporate additional wording to ensure the IGDA responds to the requirements of Fonterra for the Pahiatua IGDA location.

243. The changes are summarised as:

- Insert new definitions
- Rename 'Pahiatua Fonterra Milk Factory' references to 'Pahiatua Dairy Manufacturing Site'.
- Insert a specific building height of 40m.

- Insert a maximum building area limit for permitted activities.
- Insert bespoke noise provisions to apply to the manufacturing site.
- Minor amendments to the objectives and policies as notified.
- Amendments to the proposed standards as they relate to water supply, wastewater disposal and stormwater management.
- Remove the requirements for stormwater management plans and comprehensive development plans as part of future subdivision applications.
- Other consequential changes to the plan change wording.

Analysis

244. For the relief sought that seeks revision of the site reference, building height, maximum building area and bespoke noise standards, the submitter is seeking the existing provisions within the ODP to be 'grandfathered' to the IGDA for this site.

245. I note that the site as it currently stands, is within the Rural Management Area and these provisions were introduced to reflect an underlying resource consent held by Fonterra for the operation of the manufacturing plant. Based on this, and that the relief sought represents provisions that already exist in the ODP, I do not disagree with the changes sought. The submission essentially seeks to ensure the existing provisions apply to the manufacturing plant under proposed rule DEV02-GIZ-R1, this matter is not disputed.

246. I also do not disagree with the inclusion of a definition for the manufacturing site however, I disagree that this should extend to the additional land to the east of the existing site. This land is an extension of the IDGA in this location. Unlike the existing plant, which was established via resource consent, the additional land has not been subject to any previous processes. The existing factory forms an engrained part of the existing environment and is well established in its location. The PCA provisions provide for the expansion of the existing factory as a permitted activity subject to the standards under DEV02-GIZ-R1.

247. Any new development on the Buckley Block, as referred to in the submission, would be subject to DEV02-GIZ-R2. Therefore, it is not considered necessary to add the additional wording regard the Buckley Block as highlighted in the submission.

248. In regard to the changes sought to the objectives and policies of DEV02, I do not agree with the changes sought. This also applies to the changes sought to the subdivision standards in their entirety. As noted above, the continued operation of the landuse activity is provided for in PCA. Any future subdivision is subject to the plan change provisions as notified. Consider there to be sufficient justification or evidence to warrant a change to this proposed subdivision pathway.

249. The changes firstly seek to include reference to connection to a reticulated network, where this is available. This is not supported by Council as there are no intentions to extend services in this location. This matter was canvassed during pre-consultation with the submitter when discussions were held at an early stage in the process regarding the rezoning of the site.

250. I note here that the current ODP has a limited lifespan as Council begins work on the Regional Spatial Planning process and subsequent land use plan for the district. This means that the current plan has a limited lifespan of 3 years (more or less) based on the requirements of the Planning Act 2026. These processes will likely carry forward existing zoning extents and develop new planning provisions in line with national direction. It is acknowledged that this may further alter the direction for the site.

251. During the above timeframe, there is no intention for this site to be serviced, and no infrastructure planning is in place for this. The intent behind PCA was not to create an expectation that Council would extend services in this location. On this basis, the relief sought is rejected. The intention of PCA is that the site maintains its on-site servicing arrangements.

252. Furthermore, it is again reinforced that the site is currently rural, with a limited pathway for

subdivision and/or future development. The intention of PCA is to provide more certainty to the site for its future use through providing a clear subdivision and land use pathway within the plan.

253. The IGDA provisions are to apply to all IGDA land with some specific references to the existing industries of Oringi and the Pahiatua Plant. Two main issues identified in the s32 are stormwater management and ensuring growth and development within the areas is undertaken in a comprehensive and coordinated manner.

254. On this basis, the provisions requiring stormwater management reports and comprehensive development plans was developed and incorporated into PCA. This is to ensure that the plan sets clear guidance on the important matters to be considered as part of any future development plans. This approach is applied consistently throughout PCA for both residential and industrial land.

255. As previously outlined, the scale of the information required will be commensurate to the scale of the activity and/or subdivision proposed. This is considered an important point to make, if the submitter is concerned with information requirements. I note that the submission seeks to replace the stormwater requirement with an alternative pathway for a suitably qualified and experienced person that confirms a list of parameters. This in itself, is considered to be the same (or similar) to what the plan change currently requires in this context.

256. Further, the change from Stormwater Engineer to Suitably Qualified and Experienced Person is also not supported in this instance. As outlined throughout the reporting, stormwater management is considered to be one of the primary matters that requires addressing. This is the basis for requiring a specific expert to address this matter. The reference ensures there is no debate as to who can undertake the assessment in this regard. Thus, the change is not supported.

257. I do not consider there to be sufficient evidence to support the changes sought by the submitter in this regard.

Recommended Decision

258. I recommend accepting the submission in part, insofar as it seeks the following relief:

- Amends the reference to Pahiatua Dairy Manufacturing Site.
- Insert definition into DEV02 chapter for the existing manufacturing plant.
- Insert the building height, maximum building area and bespoke noise standards.

259. In order to incorporate these changes into the plan change wording, I recommend including a definition within the introduction section of the DEV02 chapter, and a reference to Rule 4.1.2.2 from the ODP into proposed Rule DEV02-GIZ-R1 as a means of compliance for activities under this rule. See Appendix 2 for the proposed wording change.

260. I recommend rejecting the submission in part, insofar as it seeks the following relief:

- Inserts a definition for the Buckley Block.
- Amends the objectives and policies as they relate to servicing matters.
- Amends the subdivision standards as they relate to servicing.
- Amends the subdivision standards as they relate to stormwater management plan and comprehensive development plan requirements.

Matters relating to Dannevirke RGDA

Relevant Submissions

S2.1, S22, S44.1, S53, S54, FS3, FS9

261. Several submissions (S2, S44, S53, S54) have been received that oppose inclusion of the

Dannevirke RGDA. The basis for these submissions is primarily centred on the disruption the zoning change would have on current land uses, property rights, rates and property values. Further, the submission indicates that landowners have purchased land in this location for a rural-lifestyle living environment that is in close proximity to Dannevirke township.

262. Issues are also raised in regard to the changing environment over time, in particular as the area changes, increased noise pollution for existing landowners. Further, the proposed zoning does not reflect the physical characteristics, limitations, and ongoing challenges associated with our land. The land is not vacant development land; it is an established lifestyle area with existing dwellings and established rural/lifestyle use. Rezoning to residential would unnecessarily change the character and potential use of existing properties.

263. It is also noted that the submissions also cite stormwater and flooding matters, as well as infrastructure matters, as further reasons for their objection. These matters are considered and addressed above in this report and for brevity, I do not intend to repeat this here.

Analysis

264. Firstly, I reinforce the point that Council is obliged to undertake growth planning and provide sufficient land supply to cater for growth over the 30-year timeline. The growth direction for Dannevirke and the wider Tararua District was set and adopted by Council under the TDUGS. PCA is the implementation of the recommendations set by the TDUGS.

265. The specific location set for rezoning in Dannevirke was influenced by a number of factors, these are:

- Projected population growth for Dannevirke.
- Required land supply to meet growth demand.
- Proximity to existing town centre to maintain a compact urban form.
- Balancing the loss of HPL.
- Proximity to existing roading and three waters infrastructure.

266. Therefore, the overall RGDA for Dannevirke forms part of a comprehensive response to growth and sufficient land is required over 30 years to meet demand. I note here that that growth will not happen instantaneously and the wider Dannevirke RGDA will not transform from a rural environment to a residential one in a short space of time. The area will progressively develop over the whole 30-year horizon.

267. As demonstrated through the s32 reporting, PCA as proposed is considered the most appropriate option moving forward. Council is responding to growth pressure and the location has been identified as the most appropriate for the future growth of Dannevirke.

268. The growth area is considered to be well-connected by an existing roading network and represents a logical extension to the existing urban area. Proximity to infrastructure also plays an important role. Areas of land further north from Dannevirke are located an extended distance from these networks which give rise to challenges rendering these locations unsuitable for growth.

269. Areas of land to the east and south of the town are also not considered appropriate due to topographical constraints and disconnect form the urban area. Thus, the proposed area can be considered the only option for greenfield growth in the Dannevirke context.

270. With respect to the points raised regarding the proposal constraining underlying land use activities, as highlighted in the s32 reporting and elsewhere in this report, existing uses will maintain existing use rights and will be able to continue. There is no mechanism in the plan change that requires landowners to either sell or relocate from their property following completion of the plan change process. The change in zone is a signal to the future of the land and controls what future activities may establish there.

271. Council is not a developer and the development of land within all of the PCA development areas will be driven by the private sector. It is not until a party with the intention of developing

the land, that the land will be developed. What PCA does in this instance, is signal a change over time for the land.

272. The matters raised in the submissions are acknowledged and it is noted that the majority of these matters relate to current circumstances. The land held by the submitters are a small portion of a larger growth area that is proposed for Dannevirke. As this is a comprehensive approach to growth, the area is put forward in one large contiguous form. It is not considered appropriate to create zoning anomalies, essentially 'spot zones', within the wider area.

273. As discussed previously, the plan change sends a signal that this land is to change over time. Development of a residential nature is enabled to respond to the growth needs of not only Dannevirke, but also the district as a whole. Ultimately, growth is expected to occur and land is required to provide for this growth. The areas identified within PCA are the most appropriate to meet this growth demand.

274. Existing land uses, property rights and reverse sensitivity matters are acknowledged however, these are common matters that occur through the growth planning and rezoning process. Eventually, the area will transition into more of an urban environment as development begins to occur and existing rural based activities will cease to remain and eventually relocate to other rural zoned land that is available.

275. For these reasons, the submission matters are rejected in this instance.

Recommended Decision

276. The submissions are rejected insofar as they object to PCA and the inclusion of the Dannevirke RGDA.

Matters relating to Eketāhuna RGDA

Relevant Submissions

S13.1, S15.1, S16.1, S18.1, S19.1, S20.1, S27.1, S29.1, S32.1, S37.1, S39, S41, S45, S52.1, FS1, FS8

277. Several submissions have been received that oppose inclusion of the Eketāhuna RGDA. The basis for these submissions is primarily centred on the disruption the zoning change would have on current land uses, property rights, rates and property values. Further, the submissions indicate that landowners have purchased land in this location for a rural-lifestyle living.

278. Issues are also raised in regard to the proposed zoning does not reflect the physical characteristics, limitations, and ongoing challenges associated with our land. The land is not vacant development land; it is an established lifestyle area with existing dwellings and established rural/lifestyle use. Rezoning to residential would unnecessarily change the character and potential use of existing properties.

279. It is also noted that the submissions also cite stormwater and flooding matters, as well as infrastructure matters, as further reasons for their objection. These matters are considered and addressed above in this report and for brevity, I do not intend to repeat this here.

Analysis

280. Firstly, I reinforce the point that Council is obliged to undertake growth planning and provide sufficient land supply to cater for growth over the 30-year timeline. The growth direction for Dannevirke and the wider Tararua District was set and adopted by Council under the TDUGS. PCA is the implementation of the recommendations set by the TDUGS.

281. The specific location set for rezoning in Eketāhuna was influenced by a number of factors, these are:

- Projected population growth for Eketāhuna.
- Required land supply to meet growth demand.

- Proximity to existing town centre to maintain a compact urban form.
- Balancing the loss of HPL.
- Existing landholding and zoning patterns.
- Proximity to existing roading and three water infrastructure.

282. Therefore, the overall RGDA for Eketāhuna forms part of a comprehensive response to growth and sufficient land is required over 30 years to meet demand. I note here that that growth will not happen instantaneously and the wider Eketāhuna RGDA will not transform from a rural environment to a residential one in a short space of time. The area will progressively develop over the whole 30-year horizon.

283. As demonstrated through the s32 reporting, PCA as proposed is considered the most appropriate option moving forward. Council is responding to growth pressure, and the location has been identified as the most appropriate for the future growth of Eketāhuna.

284. With respect to the points raised regarding the proposal constraining underlying land use activities, as highlighted in the s32 reporting and elsewhere in this report, existing uses will maintain existing use rights and will be able to continue. There is no mechanism in the plan change that requires landowners to either sell or relocate from their property following completion of the plan change process. The change in zone is a signal to the future of the land and controls what future activities may establish there.

285. Council is not a developer and the development of land within all of the PCA development areas will be driven by the private sector. It is not until a party with the intention of developing the land, that the land will be developed. What PCA does in this instance, is signal a change over time for the land.

286. The matters raised in the submissions are acknowledged and it is noted that the majority of these matters relate to current circumstances. The land held by the submitters are a small portion of a larger growth area that is proposed for Eketāhuna. As this is a comprehensive approach to growth, the area is put forward in one large contiguous form. It is not considered appropriate to create zoning anomalies, essentially 'spot zones', within the wider area.

287. It is noted here that the Eketāhuna RGDA is unique compared to the other areas as it contains a historic survey plan and allotment layout that is considered more aligned to a residential outcome than a rural one. It is acknowledged that a number of these allotments are contained within wider landholdings and operate as rural-lifestyle/rural environments; however, the area is not considered to be a 'true' rural area. The proposed rezoning area reflects this and also a number of instances of split-zoning that require a 'tidy-up'.

288. Furthermore, it is acknowledged that of the four RGDA's, Eketāhuna has the lowest growth rates, therefore the area is smaller in scale to account for this. Due to physical constraints, topography and natural hazard risks, other areas of Eketāhuna are not considered appropriate for future residential development. The proposed rezoning is therefore located in the most suitable areas for this context.

289. As discussed previously, the plan change sends a signal that this land is to change over time. Development of a residential nature is enabled to respond to the growth needs of not only Eketahuna, but also the district as a whole. Ultimately, growth is expected to occur and land is required to provide for this growth. The areas identified within PCA are the most appropriate to meet this growth demand.

290. Existing land uses, property rights and reverse sensitivity matters are acknowledged however, these are common matters that occur through the growth planning and rezoning process. Eventually, the area will transition into more of an urban environment as development begins to occur and existing rural based activities will cease to remain and eventually relocate to other rural zoned land that is available.

291. For these reasons, the submission matters are rejected in this instance.

Recommended Decision

292. The submissions are rejected insofar as they object to PCA and the inclusion of the Eketāhuna RGDA.

Matters relating to Woodville RGDA

Relevant Submissions

S14.2, S26, S38, S42, S60, FS6

293. Several submissions have been received that oppose inclusion of the Woodville RGDA. The basis for these submissions is primarily centred on the disruption the zoning change would have on current land uses, property rights, rates and property values. Further, the submissions indicate that landowners have purchased land in this location for a rural-lifestyle living.

294. Issues are also raised in regard to the proposed zoning does not reflect the physical characteristics, limitations, and ongoing challenges associated with our land. The land is not vacant development land; it is an established lifestyle area with existing dwellings and established rural/lifestyle use. Rezoning to residential would unnecessarily change the character and potential use of existing properties.

295. It is also noted that the submissions also cite stormwater and flooding matters, as well as infrastructure matters, as further reasons for their objection. These matters are considered and addressed above in this report and for brevity, I do not intend to repeat this here.

Analysis

296. Firstly, I reinforce the point that Council is obliged to undertake growth planning and provide sufficient land supply to cater for growth over the 30-year timeline. The growth direction for Woodville and the wider Tararua District was set and adopted by Council under the TDUGS. PCA is the implementation of the recommendations set by the TDUGS.

297. The specific location set for rezoning in Woodville was influenced by a number of factors, these are:

- Projected population growth for Woodville.
- Required land supply to meet growth demand.
- Proximity to existing town centre to maintain a compact urban form.
- Balancing the loss of HPL.
- Existing landholding and zoning patterns.
- Proximity to existing roading and three water infrastructure.

298. Therefore, the overall RGDA for Woodville forms part of a comprehensive response to growth and sufficient land is required over 30 years to meet demand. I note here that that growth will not happen instantaneously and the wider Woodville RGDA will not transform from a rural environment to a residential one in a short space of time. The area will progressively develop over the whole 30-year horizon.

299. As demonstrated through the s32 reporting, PCA as proposed is considered the most appropriate option moving forward. Council is responding to growth pressure, and the location has been identified as the most appropriate for the future growth of Woodville.

300. With respect to the points raised regarding the proposal constraining underlying land use activities, as highlighted in the s32 reporting and elsewhere in this report, existing uses will maintain existing use rights and will be able to continue. There is no mechanism in the plan change that requires landowners to either sell or relocate from their property following completion of the plan change process. The change in zone is a signal to the future of the land and controls what future activities may establish there.

301. Council is not a developer and the development of land within all of the PCA development

areas will be driven by the private sector. It is not until a party with the intention of developing the land, that the land will be developed. What PCA does in this instance, is signal a change over time for the land.

302. The matters raised in the submissions are acknowledged and it is noted that the majority of these matters relate to current circumstances. The land held by the submitters are a small portion of a larger growth area that is proposed for Woodville. As this is a comprehensive approach to growth, the area is put forward in one large contiguous form. It is not considered appropriate to create zoning anomalies, essentially 'spot zones', within the wider area.

303. Woodville is well-placed to respond to growth demand as is addressed within both the TDUGS and the s32 reporting. The development area is well-connected through an existing 'grid-style' road network and represents a logical extension of the existing urban area. The area proposed essentially 'fills out' the grid on the northern side of the township.

304. As discussed previously, the plan change sends a signal that this land is to change over time. Development of a residential nature is enabled to respond to the growth needs of not only Woodville, but also the district as a whole. Ultimately, growth is expected to occur and land is required to provide for this growth. The areas identified within PCA are the most appropriate to meet this growth demand.

305. Existing land uses, property rights and reverse sensitivity matters are acknowledged however, these are common matters that occur through the growth planning and rezoning process. Eventually, the area will transition into more of an urban environment as development begins to occur and existing rural based activities will cease to remain and eventually relocate to other rural zoned land that is available.

306. For these reasons, the submission matters are rejected in this instance

Recommended Decision

307. The submissions are rejected insofar as they object to PCA and the inclusion of the Woodville RGDA.

Matters relating to Pahiatua RGDA

Relevant Submissions

S8, S10, S11, S36, S49, S56, S57,

308. Several submissions have been received that oppose inclusion of the Pahiatua RGDA. The basis for these submissions is primarily centred on the disruption the zoning change would have on current land uses, property rights, rates and property values. Further, the submissions indicate that landowners have purchased land in this location for a rural-lifestyle living.

309. Issues are also raised in regard to the proposed zoning does not reflect the physical characteristics, limitations, and ongoing challenges associated with our land. The land is not vacant development land; it is an established lifestyle area with existing dwellings and established rural/lifestyle use. Rezoning to residential would unnecessarily change the character and potential use of existing properties.

310. It is also noted that the submissions also cite stormwater and flooding matters, as well as infrastructure matters, as further reasons for their objection. These matters are considered and addressed above in this report and for brevity, I do not intend to repeat this here.

Analysis

311. Firstly, I reinforce the point that Council is obliged to undertake growth planning and provide sufficient land supply to cater for growth over the 30-year timeline. The growth direction for Pahiatua and the wider Tararua District was set and adopted by Council under the TDUGS. PCA is the implementation of the recommendations set by the TDUGS.

312. The specific location set for rezoning in Pahiatua was influenced by a number of factors, these

are:

- Projected population growth for Pahiatua.
- Required land supply to meet growth demand.
- Proximity to existing town centre to maintain a compact urban form.
- Balancing the loss of HPL.
- Existing landholding and zoning patterns.
- Proximity to existing roading and three water infrastructure.

313. Therefore, the overall RGDA for Pahiatua forms part of a comprehensive response to growth and sufficient land is required over 30 years to meet demand. I note here that that growth will not happen instantaneously and the wider Pahiatua RGDA will not transform from a rural environment to a residential one in a short space of time. The area will progressively develop over the whole 30-year horizon.

314. As demonstrated through the s32 reporting, PCA as proposed is considered the most appropriate option moving forward. Council is responding to growth pressure, and the location has been identified as the most appropriate for the future growth of Pahiatua.

315. With respect to the points raised regarding the proposal constraining underlying land use activities, as highlighted in the s32 reporting and elsewhere in this report, existing uses will maintain existing use rights and will be able to continue. There is no mechanism in the plan change that requires landowners to either sell or relocate from their property following completion of the plan change process. The change in zone is a signal to the future of the land and controls what future activities may establish there.

316. Council is not a developer and the development of land within all of the PCA development areas will be driven by the private sector. It is not until a party with the intention of developing the land, that the land will be developed. What PCA does in this instance, is signal a change over time for the land.

317. The matters raised in the submissions are acknowledged and it is noted that the majority of these matters relate to current circumstances. The land held by the submitters are a small portion of a larger growth area that is proposed for Pahiatua. As this is a comprehensive approach to growth, the area is put forward in one large contiguous form. It is not considered appropriate to create zoning anomalies, essentially ‘spot zones’, within the wider area.

318. As discussed previously, the plan change sends a signal that this land is to change over time. Development of a residential nature is enabled to respond to the growth needs of not only Pahiatua, but also the district as a whole. Ultimately, growth is expected to occur and land is required to provide for this growth. The areas identified within PCA are the most appropriate to meet this growth demand.

319. Existing land uses, property rights and reverse sensitivity matters are acknowledged however, these are common matters that occur through the growth planning and rezoning process. Eventually, the area will transition into more of an urban environment as development begins to occur and existing rural based activities will cease to remain and eventually relocate to other rural zoned land that is available.

320. For these reasons, the submission matters are rejected in this instance

Recommended Decision

321. The submissions are rejected insofar as they object to PCA and the inclusion of the Pahiatua RGDA.

Natural Hazards

Relevant Submissions

S25, S43, FS7

322. S25 supports the plan change however, seeks minor amendments in relation to natural hazards. These amendments are outlined in the submission and seek to include additional reference to natural hazard risks in the plan change text.

323. S43 also supports the plan change and seeks that the provisions, as notified, as they relate to natural hazards be retained. The submission also seeks additional provisions to address natural hazards.

Analysis

324. The current subdivision and development framework, in particular the land use and subdivision processes, are considered adequate for the management of natural hazards within the growth areas. These processes rely on existing information that covers fault lines, avoidance and awareness areas, liquefaction, flood and other natural hazard risks.

325. These risks are adequately managed through the resource consent process whereby a combination of the NPS:NH, s106 and s106A of the RMA, are applied. The NPS:NH contains a matrix for assessing risk for proposed developments and sets out how these are to be manged depending on the significance of the risk at hand.

326. Further amendments to the text are therefore not considered necessary in this instance. There are no natural hazard risk considered to be present that would preclude the plan change areas from being developed.

Recommended Decision

327. Reject the submission insofar as it requests amendments to the plan change text.

328. Accept the submission as it relates to support for PCA.

Specific matters, subdivision rules and standards

Rates Implications

Relevant Submissions

S2, S5, S9, S16, S17, S18, S22, S24, S26, S28, S29, S33, S38, S39, S44, S55, FS3

329. A number of submissions raise concern in relation to the rates implications of the proposed rezonings (i.e. an increase in rates).

Analysis

330. This is not considered a matter that is relevant under the RMA plan making framework and is not a matter that should prevent the plan change from proceeding.

Recommended Decision

331. The submissions insofar as they raise matters relating to rates are rejected.

Powerco Submission

Relevant Submissions

S46

332. S46 was received from Powerco. The submitter does not oppose the plan change but seeks relief to amend the planning provisions in DEV01 to specifically include references to electricity network assets. The specific amendments are included within their original submission.

Analysis

333. I acknowledge the request of Powerco however, in this instance I do not consider the amendments to be necessary. Electricity assets are sufficiently managed through the resource consent process and the existing provisions of the ODP that relate to network utilities and infrastructure operations will continue to apply.

Recommended Decision

334. The submission is thus rejected on this basis.

Additional land request – Pahiatua and Woodville

Relevant Submissions

S23, S49, S56, FS7

335. S49 seeks inclusion of additional land within the Pahiatua RGDA that is located at the southern edge of Pahiatua. S56 seeks inclusion of the land to the western side of the main road at the northern end of town.

336. S23 seeks to extend the Woodville IGDA to the submitters landholding to the south on the opposite side of the state highway and seeks relief as such. The submitter considers this to be a 'logical extension' of the IGDA and resolves zoning and access issues in this location.

Analysis

337. These areas of land were considered through the preparation of the TDUGS where it was concluded that additional land at the southern extent of Pahiatua and the southern side of the southern extent of the Woodville area were not appropriate. This was mainly due to a combination of flood risks and proximity from network infrastructure. In particular, a number of constraints were identified for extending services in this direction.

338. Further, this area has not been considered by the reporting nor the technical evidence to support the plan change. I do not consider it appropriate to include additional land at this stage of the process on this basis and on the basis that this area has not been subject to a formal consultative process.

339. Lastly, the supply of land for growth under PCA is at the higher end of provision to meet growth demand. Therefore, insufficient justification exists to warrant additional rezoning.

Recommended Decision

340. The submission be rejected.

Land exclusion - Woodville

Relevant Submissions

S42

341. S42 request exclusion from the plan change due to the current land use that occupies the land at 31 Bevan Street in Woodville. The submitter raises concern with regard to reverse sensitivity effects on the existing use as growth and development occurs on the land surrounding the site.

Analysis

342. The land held by the submitters is a small portion of a larger growth area that is proposed for Woodville. As this is a comprehensive approach to growth, the area is put forward in one large contiguous form. It is not considered appropriate to create zoning anomalies, essentially 'spot zones', within the wider area.

343. With respect to the points raised regarding the proposal constraining underlying land use activities, as highlighted in the s32 reporting and elsewhere in this report, existing uses will maintain existing use rights and will be able to continue. There is no mechanism in the plan change that requires landowners to either sell or relocate from their property. The change in

zone is a signal to the future of the land and controls what future activities may establish there.

344. The reverse sensitivity matters are acknowledged, as are the landowner's intent to further develop the site over time. Notwithstanding this, Woodville forms part of a comprehensive response to growth and sufficient land is required over 30 years to meet demand. I note here that that growth will not happen instantaneously and the wider Woodville RGDA will not transform from a rural environment to a residential one in a short space of time. The area will progressively develop over the whole 30-year horizon.

345. As demonstrated through the s32 reporting, PCA as proposed is considered the most appropriate option moving forward. Council is responding to growth pressure, and the location has been identified as the most appropriate for the future growth of Woodville.

346. As outlined previously, Woodville is well-placed to respond to growth demand as is addressed within both the TDUGS and the s32 reporting. The development area is well-connected through an existing 'grid-style' road network and represents a logical extension of the existing urban area. The area proposed essentially 'fills out' the grid on the northern side of the township.

347. As discussed previously, the plan change sends a signal that this land is to change over time. Development of a residential nature is enabled to respond to the growth needs of not only Woodville, but also the district as a whole. Ultimately, growth is expected to occur and land is required to provide for this growth. The areas identified within PCA are the most appropriate to meet this growth demand.

348. Existing land uses, property rights and reverse sensitivity matters are acknowledged however, these are common matters that occur through the growth planning and rezoning process. Eventually, the area will transition into more of an urban environment as development begins to occur and existing rural based activities will cease to remain and eventually relocate to other rural zoned land that is available.

Recommended Decision

349. The submission be rejected.

Keeping of animals

Relevant Submissions

S2, S5, S15, S18, S19, S20, S22, S27, S30, S39, S40, S42, FS3

350. A number of submissions raise matters regarding the continued 'keeping of animals' on the land to be rezoned.

Analysis

351. It is acknowledged that all land to be rezoned under PCA is currently within the Rural Zone. Existing land uses, property rights and reverse sensitivity matters are acknowledged; however, these are common matters that occur through the growth planning and rezoning processes. Eventually, the area will transition into an urban environment as development begins to occur and existing rural based activities will cease to remain and eventually relocate to other rural zoned land that is available.

352. As outlined earlier in this report, regarding property rights and existing use rights, landowners within the growth areas will be able to continue their current, lawfully established, activities following any potential rezoning. There is no mechanism in the plan change that requires these activities to cease, and existing use rights, as provided for in the RMA, will be afforded to all landowners.

353. I note the submission points regarding the keeping of animals, which is a matter governed by the Council's Keeping of Animals Bylaw 2024 (attached as appendix 5). As far as I understand, the current bylaw wording is linked to the zone and will impact land that changes from a rural zone to a different zone, such as residential. Given this issue, Council has confirmed that upon any zoning changes resulting from PCA, it will amend the Keeping of Animals Bylaw, to

account for existing use rights. A Council resolution will be made following the outcome of this process.

Recommended Decision

354. The submissions be rejected.

Consequential Amendments

355. There are no consequential amendments necessary under clause 16 of Schedule 1 of the RMA.

Section 32AA Evaluation

356. Section 32AA of the RMA requires a further evaluation of changes made to PCA since the original evaluation report was completed. This evaluation must be undertaken in accordance with s32 of the Act, which requires the objectives of proposals to be examined for their appropriateness in achieving the purpose of the Act (s32(1)(a)), and whether the proposed provisions (including methods) are the most appropriate way to achieve the objectives (s32(1)(b). This includes consideration to other practicable options, the efficiency and effectiveness and cost and benefits of the provisions in achieving the objectives.

357. This s32AA should only address the most significant recommended amendments to the PCA provisions as identified in this s42A Report, reflective of the scale and significance of these amendments.

358. The s32AA should not be exhaustive and does not need to address minor changes recommended to improve clarity or interpretation of the plan, or where amendments have been proposed that are not a significant departure from the approach that was notified.

359. The changes to PCA are limited to those identified for the Pahiatua IGDA as a result of S51. These changes are considered to be minor and are recommended to improve clarity or interpretation of the plan. The changes are to recognise and include existing provision within the ODP and do not introduce any new provisions from what currently exist.

360. Therefore, no further analysis is considered to be required.

Conclusion

361. This report has provided an assessment of submissions and further submissions in relation to PCA to the Tararua ODP.

362. I recommend accepting, accepting in part, and rejecting submissions as detailed in Appendix 1.

363. I recommend that the provisions be amended as shown in Appendix 2 for the reasons set out in this report.

364. I consider that the amended provisions will be efficient and effective in achieving the purpose of the RMA, the relevant objectives of the ODP and other relevant statutory documents, for the reasons set out in the Section 32AA evaluations undertaken in the relevant sections of this report.