

2 July 2019



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Attn: Kirk Lightbody
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File ref: RAI 04 02
2019
SC

Email public@mdc.govt.nz

Dear Kirk

HORIZONS SUBMISSION ON A NOTICE OF REQUIREMENT FROM MANAWATU DISTRICT COUNCIL TO DESIGNATE LAND FOR ROADING PURPOSES (GROWTH PRECINCT 4, FEILDING)

1. Thank you for the opportunity to make a submission on the Notice of Requirement (NOR) from Manawatū District Council (MDC) to designate land for the extension of Churcher Street, creation of new collector road off Roots Street, three new collector roads off Reid Line West, and a road bridge over the Makino Stream.
2. Horizons Regional Council (Horizons) could not gain an advantage in trade competition through this submission.

Specific parts of the NOR that our Submission relates to:

1. Horizons' submission generally supports the decision being sought. We agree that there is a need to provide and protect road connections between Port Street East and Reid Line West that facilitate current and future residential development within Growth Precinct 4.
2. In relation to the NOR, Horizons wishes to provide advice on natural hazards, stormwater management, improving water quality, Horizons' One Plan and future consenting requirements, and strategic transport priorities. Please find attached Horizons' submission on MDC's Proposed Plan Change 51 and 64, which has some comments that are relevant to the NOR.
3. The NOR application suggests that parts of the project has alignment with Horizons' One Plan and the Regional Land Transport Plan.
4. Horizons has ongoing communication and engagement with MDC in regards to urban development in Feilding. In December 2018 relevant Horizons staff (including Group Manager River Management, Senior Policy Analyst, Regulatory Manager and Coordinator District Advice) met with MDC and their Opus Consultant to provide feedback on MDC's Growth Precinct 4. The main topic of discussion was about stormwater management as well as water quality, future consenting requirements, flooding, liquefaction, future stopbank upgrades, and transport planning.

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5. Horizons Transport Team in collaboration with MDC are undertaking a mid-term review of the current Feilding public transport service, which is considering urban growth in Feilding.

Natural Hazards and Stormwater Management

6. Section 5.3 of the application discusses Objective 9-1 of the One Plan, however, it did not discuss Policy 9-4.
7. Objective 9-1 of the One Plan sets the overarching approach towards managing the effects of natural hazard events in the Region, as follows:

The adverse effects of natural hazard events on people, property, infrastructure and the wellbeing of communities are avoided or mitigated.

Policy 9-4 (Other types of natural hazards) states that:

the Regional Council and Territorial Authorities must manage future development and activities in areas susceptible to natural hazard events (excluding flooding) in a manner which:

- (a) *Ensures that any increase in risk to human life, property or infrastructure from natural hazard events is avoided where practicable, or mitigated where the risk cannot be practicably avoided,*
 - (b) *Is unlikely to reduce the effectiveness of existing works, structures, natural landforms or other measures which serve to mitigate the effects of natural hazard events, and*
 - (c) *Is unlikely to cause a significant increase in the scale or intensity of natural hazard events.*
8. GNS Science's regional scale information suggests there are no known active faults in the vicinity of these designations. Please note that as part of 2015-25 Horizons Long Term Plan, GNS Science is currently engaged to provide Active Fault Mapping and Fault Avoidance for Manawatu District. In June 2019 GNS Science and Horizons staff met with relevant MDC staff to outline the process. A draft report should be available in September 2019.
9. Horizons acknowledges that MDC commissioned Opus to complete liquefaction studies. As outlined in section 4.5 the area has low vulnerability to liquefaction and liquefaction-induced ground damage and the risk of liquefaction is assessed as low for both sides of the Makino Stream. The report recommends that no residential structures be built within 10-metres of the Makino Stream and this is supported by Horizons as an esplanade strip on both sides is essential for maintaining the stream, creating a green corridor of planning and for future recreational enhancements.
10. In 2018 MDC commissioned Opus to complete 0.5% Annual Exceedance Probability (AEP) stormwater modelling for this area. Please note that the Opus 0.5% AEP modelling on page 6 of the report (Feilding Stormwater Modelling) is the best information on flooding for this area. Horizons modelling does not take into consideration the most up to date information

such as MDC's infrastructure upgrades and recent landform changes. Section 4.5 states that future road design will be undertaken to manage overland flow paths so that no effects of ponding on other upstream or downstream properties result.

11. In regards to effective stormwater management (stormwater quantity and quality), please refer to Horizons Submission on MDC's Proposed Plan Change 51 and 64 attached (refer to the discussion on page 2 and 3). The creation of new roads will mean an increase to the impermeable area and hence an increased rate of run-off from the area during rainfall events. It is not clear from the application where this water will ultimately be discharged. Currently the Makino Stream flows at full capacity through Feilding during events in excess of a 10% AEP (10 year) flood. This means that the Makino stream does not have the capacity to convey any additional discharge from new developments through Feilding. The application references a GHD report that considers stormwater but has not been provided as part of the application. The details from this report would be part of the necessary resource consent application, but it would need to show that any increase in stormwater runoff can be effectively managed without increasing discharge to the Makino Stream.

Horizons have an interest in the management of stormwater and floodwater flow paths. There will be more involvement from Horizons during the resource consenting process.

Horizons One Plan and Future Consenting Requirements

12. The application does not mention that MDC will seek resource consents from Horizons Regulatory Team; however it is assumed this will be the case at a later stage. Confirmation of the final consenting requirements will need to be undertaken once detailed design of the project has been completed. An updated report and assessments of the effects will be required for that phase of the project. Once further design details are confirmed any resource consent requirements can be dealt with through Horizons Regulatory Team. For information on consents please contact the Regulatory Team on Freephone 0508-800-800 or email consents.enquiries@horizons.govt.nz alternatively visit our website: <http://www.horizons.govt.nz/managing-natural-resources/apply-for-consents>.

The Makino Stream at this site has specific values for Trout Spawning, Domestic Food Supply, Flood Control and Drainage, as identified in Schedule B of the One Plan. There are tributaries of the Makino Stream at this site which are valued for Domestic Food Supply. Please refer to the One Plan about the 10-metre set back rules for Schedule B values (One Plan Rules 17-14 and 17-5). This area is valued for it Life-Supporting Capacity (Lowland Mixed), therefore refer to One Plan Table 17-2 for information about general conditions which apply to all water bodies and their beds.

13. A resource consent will be required from Horizons for proposed bridges and possibly for proposed culverts. Please refer to One Plan Rules 17-10 (culverts) and 17-11 (Other structures including bridges, fords and other access structures) for more information. Once details have been provided

of the proposed structures, our consents team we will be able to confirm whether a resource consent is required from Horizons.

14. Indigenous biodiversity (terrestrial and aquatic/freshwater ecology) is not specifically considered for this NOR. The further loss of indigenous biodiversity, or lack of enhancement through urban development is an issue that would need to be addressed to be consistent with the provisions of the One Plan (Issue 6.1, Policy 6-3 and 6-4). Avoidance of important areas of indigenous vegetation near the stream and, reduction of effects on waterways, will assist in reduction of the level of adverse effects to both terrestrial and freshwater ecosystem. The appropriateness and technical merit of any proposed remedies and mitigations for biodiversity effects will be assessed separately by Horizons' Science Team as part of the formal resource consenting process once detailed design plans have been prepared showing the confirmed location and area of disturbance. It is anticipated that there will also be more involvement from the Horizons' Science team during the consenting process in regards to aquatic/freshwater biodiversity, water allocation, and water quality.

In regards to terrestrial ecology, as noted in section 2.1 of the application the proposed designation is largely located over flat rural land with little vegetation in terms of trees and shrubs. Horizons Environmental Scientist Ecology has confirmed that there are no records of any biodiversity sites within the Growth Precinct 4 Structure Plan footprint, or directly adjacent.

15. Part B of the application states that during the construction phase a certain amount of earthworks will be required. Horizons One Plan Rule 13-1 permits up to 2,500m² of land disturbance per property per 12 month period, subject to compliance with conditions. These conditions include ensuring that erosion and sediment control methods are installed prior to and maintained during the land disturbance activity and ensuring that the works do not occur on land within 5 metres of the bed of a river that is permanently flowing, an ephemeral waterway within an active bed width greater than 1 metre, or a lake. Land with a pre-existing slope of 20 degrees or more is classified under the One Plan as "hill country erosion management area." The One Plan permits up to 100m² of land disturbance per property per 12 month period in hill country erosion management areas, subject to compliance with conditions.

Transport Priorities

16. Horizons Transport team generally supports the NOR and it is aligned to the Regional Land Transport Plan 2015-2025 (2018 Review) (RLTP).
17. The RLTP recognises improving connectivity as a strategic priority. Horizons Transport support the inclusion of a shared pathway recognising the importance of enabling walking and cycling as a transport mode. This contributes (in part) to the following provisions from the RLTP (2018 Review):
 - **Objective 4 A:** *reliable multi-modal transport system with less modal conflict, including walking and cycling, that mitigates potential environmental effects and improves environmental outcomes; and*
 - **Strategic priority 5.4:** *an integrated walking and cycling network.*

18. Horizons Transport Team would like to emphasise the value of enabling public transport networks to be developed in Growth Precinct 4 and Feilding North area. Provision of public transport in this area will contribute to providing a multi-modal system and provides transport choice to those residing in the area. Horizons in collaboration with MDC, are undertaking a mid-term review of the current Feilding public transport service. This review will consider urban growth in Feilding, including in Growth Precinct 4 and investigate any possible public transport demand in this area. With this in mind, we ask that development of the roading network in this area be designed in such a way that enables development of the public transport infrastructure so that growth of the network is not restricted by inadequate road layout or design. Horizons Transport are keen to continue to work with officers and provide guidance on the infrastructure needs of a public transport network.
19. Furthermore, Horizons note the findings of the traffic impact assessment in the NOR, specifically that no intersections require immediate improvements but will in time as the site becomes fully developed. We wish to draw attention to Objective 3 of the RLTP which seeks to provide a safe land transport system increasingly free of death and serious injury and Policy 1.2 which lists a number of measures to ensure continuous improvement in regional road safety. These provisions are relevant to the NOR. It is important that road safety, including the safety of pedestrians and cyclists is assessed when determining the appropriate time and design of intersection upgrades as the development of Growth Precinct 4 and the Feilding north area progresses.
20. For further information on the matters raised in relation to the Transport Priorities section of this submission, please contact the Transport team (transport@horizons.govt.nz) or call 0508 800 800 and ask to speak to the Transport Manager, Phillip Hindrup.

Closing Comment – Decision Sought

Horizons does not seek any specific changes to this NOR application, however encourages stormwater runoff to be effectively managed without increasing discharge to the Makino Stream as well as consideration given to water quality and indigenous biodiversity especially near and within the Makino Stream. MDC will need to continue to consult with Horizons during the detailed design preparation to ensure the project has alignment with Horizons One Plan and the Regional Land Transport Plan. Any necessary resource consents will need to be obtained from Horizons prior to the construction of the new roads and bridges.

Horizons wishes to be heard in support of this submission. If others make a similar submission we will consider presenting a joint case with them at the hearing.

If the panel would like to discuss or clarify any aspect of this submission please contact Sarah Carswell (email: sarah.carswell@horizons.govt.nz or DDI: (06) 9522 908).

Yours sincerely



Sarah Carswell
COORDINATOR DISTRICT ADVICE

Attached: Horizons' submission on MDC's Proposed Plan Change 51 & 64

31 May 2019



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Brent Limmer
General Manager – Community and Strategy
Manawatu District Council
60 Stafford Street
FEILDING

File ref: RAI 04 02
2019/02074

Dear Brent

HORIZONS REGIONAL COUNCIL SUBMISSION: MDC PROPOSED PLAN CHANGE 51 & 64

Thank you for the opportunity to respond to the proposed plan changes for Manawatu District Council's Proposed Plan Changes 51 & 64.

At Horizons Regional Council (Horizons) we believe our region is a great place to live, work and play. As a regional council, our responsibilities include managing the region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

In terms of environmental planning, our integrated planning document the One Plan sets out four keystone environmental issues for our region – surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened indigenous biodiversity.

Regionally, the Accelerate25 programme identifies a number of opportunities and key enablers to help realise our Region's economic potential. The action plan sets out a path to grow our regional prosperity between now and 2025. An expected outcome of the Accelerate25 programme is to see managed urban growth and increased economic activity on our region.

In relation to the proposed plan change proposals 51 & 64, our key areas of focus are land use change, improving water quality, stormwater management, natural hazard planning, biodiversity, integrated transport and responding to cultural needs within our region. These areas are addressed in brief on the following pages.

Yours sincerely

A handwritten signature in blue ink that reads "S Carswell".

Sarah Carswell
COORDINATOR DISTRICT ADVICE

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

SUBMISSION OF HORIZONS REGIONAL COUNCIL

MANAWATU PROPOSED DISTRICT PLAN CHANGE 51

This submission considers the relationship between Horizons' One Plan¹ and the need for the District Plan to give effect to the regional policy statement components and not be inconsistent with regional plan provisions, as set out in section 75 of the Resource Management Act 1991 (RMA).

This submission also considers the contributions the proposed district plan changes will make to the Regional Land Transport Plan's strategic priorities.

Horizons does not consider it would gain an advantage in trade competition through this submission.

Where not otherwise specified, Horizons generally supports the Proposed Plan Change or any further, alternative or consequential relief; as these proposals are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

CHAPTER 8: SUBDIVISION

Support Objectives 1(a), 1(d), 1(f) or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

Support Policies 1.2-1.5 or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

Support in part Objectives 1(b), 1(c), 1(e), 1(g) and 1(h)
Policies 1.1, 3.3, 3.4, 3.5, 3.7, 3.8
Rules g(viii)(ix)(xi)(xiv)(xv)

Taken together, these objectives do not adequately address the provisions in the One Plan that relate to infrastructure, particularly stormwater management. Issue 3-3 identifies strategic integration of infrastructure with land use, and links with water quality (Issue 5.1) and natural hazards (Issue 9.1).

Effective stormwater management, delivered through a combination of robust regulation and guidance in the District Plan provisions and careful operational planning during subdivision activities, development and construction is necessary for any future urban growth within the identified precinct area.

The stormwater quantity and quality objectives of the One Plan are not met when considering the sensitivity and high in-stream values of the receiving environment. The proposal to incorporate a single large pond and its location do not appear to adequately address the stormwater discharge from Growth Precinct 4. There is

¹ Manawātū-Whanganui combined regional policy statement (RPS) and regional plan

also potential to exacerbate stormwater-related flood hazards for the Feilding township.

Horizons has undertaken significant investment in works to support effective management and protect Feilding CBD from inundation. This work is planned to continue as part of our ongoing programme of work. However it should not be relied upon as an effective mitigation to the stormwater risks faced by increased urban development in Growth Precinct 4.

It should be noted that the modifications to the Reid Line Floodway north of Feilding address both limitations with the current configuration and ensuring that the flood protection standard is commensurate with the level of operating risk.

Horizons support the inclusion of rule performance standards identifying the location of natural watercourses and overland flow path and how these will be managed or enhanced from the perspective of effective natural hazard management.

Horizons notes that the overland flow path information you propose to include in the district plan as an appendix risks becoming out-dated given the potential for changes to ground levels. We understand that the intent of the provisions is primarily to ensure thorough consideration of this matter early in a consenting process and in the creation of Comprehensive Development Plans.

Relief sought

In previous discussions with MDC staff, Horizons highlighted the requirements that would need to be met the account for future urban growth, particularly where there would be further pressure on the Makino/Mangakino Stream, taking into account the existing stormwater discharges from Feilding.

This included incorporation of contemporary stormwater management principles and adoption of best practise (based on examples from across New Zealand). Horizons refer you to Rule 14-18 in the One Plan for the stormwater conditions that must be met for permitted activities.

Relief sought includes:

- a. changes to the objectives, policies and rules to give effect to effective stormwater management arising from Growth Precinct 4.
- b. retention of the wording relating to objective 1(h) in relation to natural hazards, except where changes are needed to address the stormwater issues as outlined (any such wording of a similar effect).

Support in part Objective 2
Policies 2.1-2.7

Horizons is generally comfortable with the wording proposed, or any such wording of a similar effect, however there are additions that could be considered for this objective and policy suite where they are not otherwise addressed in the plan.

Indigenous biodiversity is not considered specifically within this Proposed Plan Change, and the further loss of indigenous biodiversity, or lack of enhancement through urban development is an issue that would need to be addressed to be consistent with the provisions of the One Plan (Issue 6.1, Policy 6-3 and 6-4).

The One Plan also has a Chapter on Te Ao Maori. While not strictly within our remit, it is noted that the proposed subdivision makes no mention of Papakainga Housing. It should however be noted that the One Plan also acknowledges Hapu and Iwi interest in indigenous biodiversity, and resource management issues generally.

Relief sought:

- a. changes to the objective and policies to include integration of indigenous biodiversity, particularly preventing further loss, and enhancement of indigenous biodiversity within Growth Precinct 4.
- b. Consider the incorporation of policies that address the aspirations of Iwi and Hapu within the Rohe.

Support Objective 3
Rule f

Horizons support the inclusion of performance standards requiring minimum floor levels to mitigate the effects of a 0.5% annual exceedance probability (AEP) flood event within Chapter 8, and therefore support the proposed wording or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan.

Support in part Objective 4
Policies 4.1-4.5

Horizons support the objectives and policies in so far as they provide for effective infrastructure and growth planning, provided that they account for the stormwater management issues as addressed above.

Support in part Rules (chapter 8)

Horizons generally support the rules in Chapter 8, and the activity cascade, except where changes are needed to give effect to the issues raised in this submission.

CHAPTER 15: RESIDENTIAL ZONE

Support Objectives 1, 3 and 4 or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

Support in part Objective 2

Horizons generally supports the proposed changes to strengthen the District Plan's provisions relating to natural hazards. New policies and amendments to rules, to enable more comprehensive consideration and control of subdivision and residential development where there are risks of flood hazards, give effect to One Plan Policy 9-4(a) and (c) in particular.

Ensuring buildings and structures are located and designed to manage the risk of natural hazards, rules about providing appropriate permeable surfaces and providing information about flooding, overland flows and liquefaction within the Growth Precinct gives effect to One Plan Policy 9-1(a)(i), with regard to our councils' joint responsibility for raising public awareness of the risk of natural hazards.

Horizons acknowledges that MDC commissioned liquefaction studies and that the proposed growth area generally has low vulnerability to liquefaction and liquefaction-induced ground damage.

Horizons supports the inclusion of the rule performance standards on subdivisions and residential development providing a building platform and land free from hazard risks while also achieving a permeable surface for all lots.

Horizons seeks the same relief as set out above in relation to stormwater management, natural hazards, indigenous biodiversity and Te Ao Maori in relation to these issues being effectively managed in residential development.

Appendix 8.1 Precinct 4 Structure Plan

Support in part

While the rezoning of this rural area for residential activities to plan for urban growth is well understood, this does result in the loss of versatile soils for rural production. It should be noted that there is a limited amount of class II soils available in the region, and their loss is an issue identified in the One Plan (Issue 3-4).

TRANSPORT

Horizons Transport Team generally supports the Proposed Plan changes, particularly:

- That the changes provide for development of multi-modal transport via shared pathways, walkways and cycleways which is consistent with the requirements of the Regional Land Transport Plan.
- That there is a strong theme in the consultation to date requesting adequate public transport services be provided in Growth Precinct 4. With that in mind we wish to advise that Horizons, in collaboration with MDC are undertaking a mid-term review of the Feilding Around Town / Feilding to Palmerston North bus service as the contract is in the middle of its nine year term. The review will consider urban growth in Feilding, specifically Growth Precinct 4, and assess any future public transport demand and requirements in these areas.

Given the possibility of future public transport services in this area, we request that MDC ensure that road and footpath design / layout is adequate to enable public transport infrastructure to be developed so as not to stifle growth of the network. We refer to Policy 5.1.7 of the Regional Land Transport Plan which states “Promote the increased use of public transport by planning and providing for public transport routes and facilities in residential subdivisions and major new facilities (territorial authorities, NZ Transport Agency)” The brackets indicate who is responsible for this. It is important that the changes to the District Plan provide for the development of such infrastructure as part of the subdivision chapter. We therefore request that MDC consider adding specific reference to possible future public transport networks and infrastructure under the Objectives and Policies of the subdivision chapter.

Horizons Transport Team look forward to continuing to work with MDC as the mid-term review progresses to ensure development of this area is well understood and considered as part of the review.

MANAWATU PROPOSED DISTRICT PLAN CHANGE 64

Horizons have reviewed the proposals and generally support the proposed changes. We consider that the proposals are not inconsistent with the One Plan.

Hearings

Horizons reserves the right to be heard in support of the submission on proposed plan change 51, but at this stage does not request to be heard. Horizons does not wish to be heard in support of proposed plan change 64.

Contact for submission queries

Please do not hesitate to contact the Coordinator District Advice, Sarah Carswell if you would like to discuss or clarify any aspect of this submission.

Email: sarah.carswell@horizons.govt.nz