

**BEFORE THE MANAWATU – WANGANUI REGIONAL COUNCIL (HORIZONS
REGIONAL COUNCIL)**

In the matter of **The Resource Management Act 1991; and**

**The Proposed One Plan: Consolidated Regional
Policy Statement, Regional Plan and Regional
Coastal Plan for the Manawatu - Wanganui Region**

**REVISED STATEMENT OF EVIDENCE BY JONATHAN FERGUSON-PYE
FOR THE PALMERSTON NORTH CITY COUNCIL**

CHAPTER 3: INFRASTRUCTURE ENERGY AND WASTE

AND

**RESPONSE TO S42A REPORTS ADDRESSING SUBMISSIONS ASSOCIATED WITH
THE PROTECTION OF CLASS I AND II SOILS**

Dated: 17 April 2009

Introduction

1. My name is Jonathan Ferguson-Pye. I hold the position of Senior Policy Planner with the Palmerston North City Council (PNCC). I have the tertiary qualification of Bachelor of Resource and Environmental Planning with first class honours from Massey University. I am a Graduate member of the New Zealand Planning Institute and have five years planning experience in local government with PNCC.
2. I have read the One Plan Hearing Panel Procedures and Directions and Requests from the Chairperson circulated to all submitters by Horizons Regional Council (Horizons) on 9 May 2008. I have read the Code of Conduct for Expert Witnesses (section 5 of the Environment Court Consolidated Practice Note 2006). I agree to comply with this Code of Conduct.
3. PNCC lodged a submission on the Proposed One Plan: Consolidated Regional Policy Statement, Regional Plan and Regional Coastal Plan for the Manawatu - Wanganui Region (the One Plan) in August 2007. PNCC also lodged a further submission on the One Plan in December 2007.
4. While this is my own expert planning evidence, given the strategic importance of the One Plan to PNCC's long term planning, I do refer, in parts, to the collective view PNCC has on the One Plan.
5. The purpose of my evidence is twofold. Part one provides an analysis of the importance of the strategic integration of infrastructure with landuse planning in the context of providing for the urban growth of Palmerston North. This part of my evidence concludes by requesting an additional issue, objective, and policy be inserted in the One Plan recognising the importance of the strategic integration of infrastructure with landuse in providing for urban growth.
6. The second part of my evidence responds to the January 2009 addendum report to the Planning Evidence and Recommendations Report on submissions to the One Plan, Chapter 3: Infrastructure, Energy and Waste. PNCC has an interest in the high class soils issue raised in Mr Maassen's section 42A report. In particular, the issue of identifying the protection of Class I and II soils as being a regionally significant resource management issue for the One Plan.

Structure of Evidence

7. My evidence is structured in the following manner:

- (a) Introduction (above)
- (b) Structure of evidence (this section)

Part I

- (c) PNCC's interest in the strategic integration of infrastructure with land use in the context of urban growth
- (d) The basic elements of infrastructure in the One Plan
- (e) PNCC's submission points on the strategic integration of infrastructure and land use
- (f) Why the strategic integration of infrastructure and land use is important to PNCC and Horizons Regional Council
 - Statutory obligations;
 - The Palmerston North City District Plan (The District Plan);
 - The Operative Regional Policy Statement (RPS);
 - Urban Growth and the Relationship with the Resource Management Act 1991 (RMA) and the Local Government Act 2002; and
 - PNCC's Experience: Strategic Planning and Urban Growth
- (g) Suggested Amendments to Chapter 3

Part II

- (h) High Class Soils: A review of the key parts of PNCC's evidence on Land Chapters 5 and 12 of the One Plan
- (i) PNCC Resolution 163-08 (Directing urban growth away from areas of high class soils)
- (j) PNCC response to Mr Maassen's Section 42A Report
- (k) Conclusions

PART I

PNCC's Interest in the Strategic Integration of Infrastructure with Land Use

8. The City's interest in the strategic integration of infrastructure with landuse and high class soils in the context of urban growth, rests on the following grounds:
- PNCC has a statutory responsibility to ensure the sustainable management of the City's physical resources is achieved in an integrated manner.
 - PNCC has a statutory responsibility to manage assets and infrastructure for the benefit of the Palmerston North community.
 - Pursuant to the Local Government Act 2002 (LGA) PNCC has special duties in relation to water and sanitary services. Given the level of accountability required by the LGA PNCC has a special interest in the efficient and cost effective provision of infrastructure within the District.
 - When developing urban growth strategies under the RMA territorial authorities have a statutory responsibility to consider all relevant resource management issues.
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The Basic Elements relating to Infrastructure in the One Plan

9. The objectives and polices in the One Plan relating to managing activities involving infrastructure focus on ensuring the benefits and environmental effects of infrastructure are balanced and managed proportionately. The One Plan seeks to achieve sustainable management of physical resources by balancing the enablement of infrastructure with the requirement to appropriately manage environmental effects.
10. The One Plan recognises the importance of regionally significant infrastructure critical to the function of urban areas. An issue is identified regarding the appropriate weight given to local adverse effects in the context of evaluating the regional and national benefits derived from infrastructure and renewable energy.¹ The benefits of infrastructure and having it integrated with landuse are recognised.

¹ See Chapter 3: Infrastructure, Energy and Waste, Issue 3-1, page 31.

However, the integration of infrastructure with landuse is predominately focused on the road network. The One Plan also provides guidance on how to manage the adverse effects of infrastructure on the environment and issues of reverse sensitivity associated with existing infrastructure. However, little guidance is provided regarding the strategic integration of infrastructure with landuse in the context of urban growth.

PNCC's submission points on infrastructure in Chapter 3 of the One Plan

11. PNCC's submission to the One Plan noted that while the One Plan includes a section on Infrastructure, Energy and Waste as part of the RPS, the issues, objectives and policies appear to have overlooked the strategic integration of infrastructure with land use. *The strategic integration of infrastructure with land use through objectives, policies and methods* was added as a regional council function as part of the amendments made to the RMA in August 2005 (reference s.30(1)(gb) of the RMA). PNCC submitted that Horizons has not adequately addressed this new function within the One Plan, in particular within the RPS. PNCC indicated that it would support additional issues, objectives and policies in the One Plan relating to the strategic integration of infrastructure with land use. Such direction would enable PNCC to better plan for and maintain the compact nature of the City while also providing a firm direction to privately initiated developments which have the potential to threaten the compact nature of the City and impose infrastructural efficiencies on the City. PNCC requested further direction from Horizons at the regional level on the strategic integration of infrastructure with land use to assist PNCC in achieving sustainable growth for the City.

Why the strategic integration of infrastructure with landuse is important to PNCC and Horizons Regional Council

Statutory Obligations

12. **Section 31 Functions of territorial authorities** – The relevant functions of a territorial authority under section 31 of the Act are as follows: (with my bolding)
- “(1) *Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:*
- (a) *The establishment, implementation, and review of objectives, policies and methods to achieve **integrated management** of the*

effects of use, development, or protection of land and associated natural and physical resources of the district; (my emphasis)

- (b) *the control of any actual or **potential** effects of the use, development, or protection of land, ... -"*

Integrated management of infrastructure

13. Section 31 makes it clear that integrated management relates to both the management of effects at a site specific level and the integrated management of a district's physical resources at a wider strategic landuse level. When assessing options for urban growth PNCC has a statutory obligation to ensure that the integrated management of physical resources and landuse is achieved in order to give effect to the purpose of the Act.
14. **Section 30 Functions of regional councils** – The relevant functions of a regional council under section 31 of the Act are as follows: (with my bolding)
- “(1) *Every regional council shall have the following functions for the purpose of giving effect to this Act in its region:*
- (a) *The establishment, implementation, and review of objectives, policies, and methods **to achieve integrated management of natural and physical resources** of the region...*
- (gb) *the **strategic integration of infrastructure with land use** through objectives, policies, and methods.”*
15. Section 30(1) together with Part 2, provide regional councils with authority to set objectives and policies to implement sections 6, 7 and 8 matters that are relevant to the performance of regional council functions. In particular, section 7 of the RMA requires regard to be given to the efficient use and development of physical resources.
16. Section 30(gb), the strategic integration of infrastructure with land use, confers on regional councils a power to manage infrastructure resources strategically in conjunction with broader land use polices in order to achieve positive environmental outcomes.
17. The RMA's approach to environmental management is firmly rooted in the concepts of sustainable management and the integrated management of resources. Both territorial authorities and regional councils have a statutory obligation to consider the strategic integration of infrastructure with landuse when giving effect to the purpose of the Act.

The Palmerston North City District Plan

18. Section 2 of the Palmerston North City District Plan identifies the broad resource management issues, objectives and environmental outcomes that informed the drafting of the Plan. In this regard, section 2 of the Plan sets the strategic direction for the Plan. The Palmerston North City District Plan strategy relating to the relationship between urban growth and the provision of supporting infrastructure can be summarised as follows:
- The management of urban growth in a manner that enables urban infrastructure is efficiently and sustainably utilised
 - Enabling the community's social and economic wellbeing through appropriate management of the City's natural and built environment.
19. The overall strategy of the District Plan is clearly focused on the sustainable management of the City's natural and physical resources. The strategy explicitly refers to the critical relationship of urban growth and the efficient and sustainable provision of infrastructure. In this regard, the Plan clearly articulates the importance of the strategic integration of infrastructure with land use. The review of the Palmerston North City District Plan is likely to continue to focus on maintaining compact urban form and the sustainable management of the City's physical resources.
20. The provision of urban growth is best provided for by an integrated approach to the complex issues of sustainable urban development. Having to give effect to the One Plan in terms of the strategic integration of infrastructure with land use will compel PNCC to provide for urban growth in a strategic and integrated manner. In my opinion, greater regional direction regarding the strategic integration of infrastructure with land use will reinforce the Plan's intended direction and better enable a strategic approach to urban growth.

The Operative Regional Policy Statement

21. The parent planning instrument in relation to the Palmerston North City District Plan is the operative Regional Policy Statement (RPS) of the Horizons Regional Council. The RPS provides an overview of the resource management issues for the region, and provides for the integrated management of its natural and physical resources.
22. While the RPS does not deal extensively with issues of district land use planning and urban growth, Objective 6 and its associated policies are relevant: (with my underlining):

Objective 6

To avoid, remedy or mitigate the adverse effects of urban development.

23. The relevant associated policy is Policy 6.1 which requires territorial authorities in providing for their urban development to have regard to:

Policy 6.1

In providing for urban development the social, economic and environmental costs of development are to be considered by taking into account...

(c) *The efficient use of resources, including energy, transport and utility infrastructure.*

24. **Method 6.2** requires territorial authorities to:

Consider placing a priority on the consolidation of existing or partly developed areas before opening up new areas for urban development.

25. **Method 6.4** states:

Ensure that existing transport and utility infrastructure facilities are utilised to capacity, within practical limits, prior to promoting urban developments which require either new or extended facilities.

26. Objective 6 and the associated policies and methods seek to give effect to the Act by requiring territorial authorities to consider the efficient use and development of physical resources when making decisions concerning urban development. In my opinion, the One Plan needs to give similar consideration to the importance of the efficient provision of infrastructure when making decisions regarding urban development.

Urban Growth and the Relationship with the RMA and LGA

27. The RMA guides the landuse planning framework when providing for urban growth. There is also an associated requirement to achieve the integrated management of physical resources tied to other statutory frameworks such as the LGA.
28. Running in tandem with the requirements of the RMA in identifying areas suitable for urban growth are responsibilities conferred on a territorial authority to provide infrastructure to accommodate growth in a manner and a rate that meets the requirements of the LGA. Urban growth and infrastructural development must be aligned and work in tandem.
29. The integration of infrastructure with land use cannot occur without a strategic approach to urban growth. Under the RMA preferred urban growth paths are determined based on a robust analysis of all possible constraints and key considerations. Under the LGA mechanisms for prioritising funding such as Asset Management Plans, LTCCPs, and Development Contributions policies need to feed into a long term urban growth strategies if integration of infrastructure and landuse is to occur. Without this approach territorial authorities are unable to efficiently and effectively plan for the capital cost of growth. The integrated provision of infrastructure with landuse is underpinned by the degree to which funding streams for capital expenditure under the LGA and the urban growth decisions provided for under the RMA are aligned. Without this alignment the infrastructure required to service new urban development cannot be planned in advance of development occurring in identified urban growth areas.

30. As stated by Mr Murphy, PNCC's recommended amendments to the One Plan will help raise the importance of strategically aligning infrastructure and landuse so that urban growth can be provided for in a sustainable manner.²

PNCC's Experience: Strategic Planning and Urban Growth

31. Mr Murphy's evidence has provided an overview of the key structural and institutional constraints and considerations PNCC is faced with when determining the direction of urban growth for the City.³ PNCC is currently reviewing the City's Urban Growth Strategy, and is continuing to progress strategic landuse planning for the industrial and business sectors of the City. In particular, PNCC's industrial landuse strategy is being progressed with some urgency. A number of private initiatives to establish out of district developments on the boundary of the City but within the Manawatu District illustrate the increased pressure the City is facing in providing for urban growth. PNCC face a chorus of conflicting interests, and it is necessary to take a strategic approach to urban growth if the City is to chart a careful path guided by the requirements of the RMA.
32. **Strategic planning and integrated landuse** – prudent decision making about urban growth is important. It is PNCC's experience that significant greenfields urban development occurs best when there is comprehensive planning involving landowners in partnership with the relevant local authority. In such cases there is a common underlying premise that the land should be rezoned on the basis that it is required and appropriate for that purpose. The respective parties' then plan for infrastructure to be put in place through the Council's planning documents (e.g. LTCCP and Annual Plans) and mechanisms are put in place to recover the costs of growth (e.g. necessary amendments to Development Contribution policies). In tandem with this appropriate planning tools are put in place. This framework best provides for the sustainable management of a district's physical resources when making landuse decisions related to urban growth.
33. **Integration with strategic district plan direction** – the term "*integrated management*" sits at the heart of District Plans. This effectively requires territorial authorities to establish a direction relevant to the particular district for the ongoing sustainable management of its physical resources. As detailed in paragraph 19 of my evidence, it is likely that the Palmerston North City District Plan strategy will continue to focus on maintaining compact urban form and the sustainable management of the City's physical resources.
34. **Why is the strategic integration of infrastructure with landuse so important to territorial authorities and regional councils?** The failure to achieve the integrated provision of infrastructure with landuse results in the piecemeal provision of services and compromised urban form. Outcomes include:

² See SOE D Murphy (Dated: 30 June 2008), paragraph 70

³ See SOE D Murphy (Dated: 30 June 2008), paragraphs 29 to 70.

- (a) Inefficient use of the land resource compared with what could occur with better strategic planning;
 - (b) An uncoordinated and inefficient servicing of land;
 - (c) Potential for suboptimal roading and traffic outcomes;
 - (d) Compromised urban form;
 - (e) Duplication of infrastructure; and
 - (f) Long term, down stream costs transferred to the community.
35. **Private Plan Change 28 in the Manawatu District** - Plan Change 28 was a private plan change request to the Manawatu District Plan to re-zone 'Rural 2' land located on the corner of Richardsons and Roberts Line to 'Industrial'. Importantly, the Plan Change proposed on-site servicing in respect of water, waste water, and storm water. PNCC and Horizons Regional Council were both submitters to the proposal. The Plan Change was declined by the Manawatu District Council Hearings Panel in May 2008.
36. While Plan Change 28 was located within the Manawatu District the site was located on the boundary with the City. In practical terms the site, if rezoned, would have become part of the urban form and function as part of the City. The Plan Change decision document raised a number of important issues related to urban growth and the merits of strategic planning in contrast to a market lead approach. Key points of the decision document that highlight the urban growth pressures facing the City included the following:
- There is significant demand for greenfield industrial land in the Manawatu District and Palmerston North City;
 - That the rezoning of land north-east of the North East Industrial Zone is almost inevitable, provided the issues can be resolved;
 - The boundary line between the two districts is not a determinative factor to whether the proposal succeeds or fails;
 - The real risk of a domino effect of a number of private plan changes in the area is a concern;
 - That people and communities ought to be able to order their lives under a district plan with some assurance and certainty. The effects of having to deal with continuing private plan changes is a concern; and
 - A private plan change request in the area could be successful if it involved sufficient land to enable an integrated package of environmental controls and on-site servicing solutions. This approach could potentially address the potential for and the consequences of the domino effect and provide an acceptable level of certainty for the surrounding community.

37. The Plan Change highlighted the importance of strategic planning in an urban growth context. The purpose of strategic planning is to provide for integrated decision making and the coordinated provision of physical infrastructure with a long term focus. Strategic planning ensures the coordinated and efficient provision of infrastructure and provides a level of certainty for the community and the market upon which to base their future landuse decisions.
38. However, the strategic planning process can lag behind market demand. The Plan Change 28 decision noted that private initiatives that provide an integrated package of environmental controls sufficient to create an acceptable level of certainty for the community could provide for urban growth. Critically, if PNCC's strategic landuse planning for urban growth is not responsive to market demand decisions regarding the direction and nature of urban growth could be taken out of the City's hands. In my opinion this scenario would lead to sub-optimal planning outcomes and the inefficient provision of infrastructure over the long term.
39. **The relevance of Plan Change 28 to Horizons Regional Council** – Associated with the domino effect of a proliferation of private plan change requests to the north east of the City is also a risk of an increasing number of separate systems for water supply, stormwater, and waste water systems. The Plan Change 28 decision document noted that a number of on-site systems could potentially have cumulative adverse effects related to the quantity and quality of ground water.
40. At the Plan Change 28 hearing Horizons Regional Council expressed a preference for water supply and wastewater disposal for the site to be serviced through reticulated supply. As the authority responsible for granting or declining the necessary regional resource consents, Horizons raised concerns about becoming the final judge of what would be permitted on the site and therefore effectively making decisions that affected the growth of the City.
41. Plan Change 28 highlighted a number of issues and reasons why the Regional Council needs to provide greater direction regarding the strategic integration of infrastructure with landuse in the context of urban growth. It is clear that without a strategic approach to the provision of urban growth the Regional Council in this instance could become, by default, the final arbiter of the direction of urban growth for the City.
42. As noted by Mr Murphy, PNCC's request for greater regional direction on the strategic integration of infrastructure with landuse is not about being better positioned to challenge private initiatives. In recent years PNCC have supported private plan change requests (Plan Change 35: Midhurst Street Industrial Area and Plan Change 32: Napier Road Industrial Precinct) that have complemented the City's strategic approach and presented an integrated package of landuse controls. The request for greater regional direction regarding the strategic integration of

infrastructure with land use will have to be given effect to by PNCC's growth strategies and by private initiatives.

**The Strategic Integration of Infrastructure Relief with Land Use:
Recommended Amendments**

43. The following issue, objective and policy regarding the **strategic integration of infrastructure with land use** be added to the One Plan:

“Issue 3-3: The strategic integration of infrastructure with land use

Incremental urban development can result in the piecemeal and inefficient provision of associated infrastructure.

Objective 3-2: The strategic integration of infrastructure with land use

The demand for incremental urban development is minimised through the adequate and timely supply of land for new urban development allowing associated infrastructure to be planned in a strategic manner.

[Note: current objective 3-2 to be renumbered 3-3.]

Policy 3-4 The strategic integration of infrastructure with land use

Territorial Authorities shall proactively develop and implement appropriate land use strategies and align their infrastructural asset management planning in accordance with these strategies to ensure the efficient and effective provision of associated infrastructure.”

44. [Note: renumber following policies 3-4 to 3-13]

PART II

High Class Soils: Key Parts of PNCC's Evidence on Land Chapters 5 and 12

45. PNCC's June 2008 evidence to the Land Chapters of the One Plan supported the Regional Council's position that the loss of high class soils due to urban expansion was not a regionally significant resource management issue. PNCC agreed that the management of high class soils is a local issue best managed by territorial authorities.

46. Evidence stated that the development of Plans and urban growth strategies involve a broad technical assessment that must demonstrate landuse decisions are consistent with the purpose and principles of the RMA. It was also noted that the RMA has no specific reference to the avoidance of urban development on high class soils. The Act requires a balanced approach where all relevant resource management issues are considered when developing Plans and growth strategies.
47. To place high class soils in a pre-eminent position within the RPS would impinge upon the ability of territorial authorities to consider the full range of resource management issues when identifying urban growth areas because a District Plan is required to give effect to the RPS.
48. The relatively limited controls on rural-residential subdivision within the region were identified as a greater risk to the needs of future generations and the life supporting capacity and finite characteristics of the regions productive land than strategically planned extensions to Palmerston North City's current urban limits.
49. I reconfirm the Council's evidence and the reasons that underpin the view that the loss of high class soils due to urban expansion is not a regionally significant resource management issue and is best managed at the local level by District Plans and urban growth strategies.

PNCC Resolution 163-08

50. As part PNCC's decision to review the City's Urban Growth Strategy the Council has adopted a series of priorities to guide the selection of areas for urban growth. These priorities have been divided into three broad classes, being 'highest' 'significant' and 'important'. Protection of high class is accorded 'highest' priority.
51. Council resolution 163-08 adds an additional element in relation to the highest priorities as follows:
- *"urban growth should mainly occur on high terrace soils described on maps compiled by JD Cowie, DSIR, 1976, as Marton, Milson and/or Tokomaru soils.*
 - *urban growth should not normally occur on "recent soils of the river flats" or on "gleyed recent and gley soils of the river flats" (Cowie map, 1976, per Dr Hughe Wilde, Landcare Research Ltd).*
 - *any departure from these principles should be only by explicit resolution of the Council having regard to the specific circumstances of an individual case."*
52. The purpose of Resolution 163-08 is to direct the review of the City's Urban Growth Strategy away from considering urban growth in areas containing high class soils. The Resolution demonstrates that the management of high class soils is being managed at the local territorial authority level.

53. All decisions relating to urban growth, including the merits of underpinning resource management priorities, are subject to a quasi-judicial process. It is noted that the resource management merits of Resolution 163-08 will also be subject to examination through the statutory process.

John Maassen's S.42A Report

54. Mr Maassen's evidence recognises that the protection of high class soils represents only one part in the overall consideration of potential urban growth areas for Palmerston North. There are a wide range of equally important resource management issues that must be considered by territorial authorities under the statutory framework of the RMA.
55. There are a number of comments I would like to make with regard to Mr Maassen's s42A report:
1. Mr Maassen correctly notes that Horizons Regional Council undertook an extensive consultation process with the community and key stakeholders prior to notifying the One Plan. As participants in the pre-notification consultation process PNCC officers agreed that the high class soils issue was not a regionally significant resource management issue. PNCC noted that the management of the issue was best dealt with at the local authority level.
 2. Mr Maassen's evidence is consistent PNCC's assessment that when considering urban growth areas the issue of high class soils is one of a number of resource management issues that must be considered. The development of Plans and growth strategies require an overall broad consideration of resource management issues, which is consistent with the purpose and principles of Part II of the Act.
 3. I agree that generalised statements regarding high class soils of the type contained in the operative RPS are unhelpful in the progression of the City's review of the Urban Growth Strategy given that district plans must give effect to the RPS.
 4. I note and agree with Mr Maassen's conclusion that while the operative RPS recognises the protection of high class soils, that protection is not a pre-eminent consideration when providing for urban development.
 5. Mr Maassen notes that the prohibition of urban development on high class soils is not supported by any weight of case law.
 6. Mr Maassen notes that when territorial authorities evaluate plan changes or review plans the high class soils issue is addressed and weighted appropriately. A number of private plan change applications within the City over the last 5 years have included an assessment of soils. PNCC's technical assessment and recommendations have appropriately considered and weighted the soil resource. However, soils have not been considered in

isolation. Other resource management issues such as the safe and efficient operation of the road network, efficient provision of infrastructure, noise, and landscapes have also been evaluated. This evaluation is part of a robust and fully considered decision making process for plan changes. In this regard, PNCC's decision making processes for plan changes demonstrate that the soils issue is appropriately managed at a local territorial authority level.

Overall Conclusions

56. PNCC's interest in the strategic integration of infrastructure with landuse rests on its statutory responsibility to ensure the sustainable management of the City's physical resources is achieved in an integrated manner. However, the One Plan offers little guidance to territorial authorities regarding the strategic integration of infrastructure with landuse in the context of urban growth. In my opinion, greater regional direction in this area is consistent with PNCC's and the Regional Council's statutory function to give effect to the purpose of the Act and is consistent with the strategic intent of the operative RPS and Palmerston North City District Plan. PNCC's recommendations will strengthen the City's strategic approach to urban growth and enable improved alignment of its obligations under the RMA and LGA.
57. PNCC face complex issues and a chorus of competing interests in providing for urban growth. In my opinion the strategic approach to urban growth is the best path to chart given PNCC's responsibility to manage infrastructure for the long term benefit of the Palmerston North community. Failure to achieve the strategic integration of infrastructure with landuse will result in sub-optimal planning solutions and the inefficient and ad hoc provision of infrastructure over the long term.
58. Finally, I reconfirm the Council's evidence and the reasons that underpin the view that the loss of high class soils due to urban expansion is not a regionally significant resource management issue and is best managed at the local level by District Plans and urban growth strategies.



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City Future

PALMERSTON NORTH CITY COUNCIL