

Submission by Transpower New Zealand Limited on Proposed Plan Change 3 to the Manawatū-Whanganui Regional Council (Horizons) One Plan – Regional Policy Statement

9 November 2022

Keeping the energy flowing



Transpower New Zealand Limited

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SUBMISSION FORM

ON PROPOSED CHANGE 3

TO: Manawatū-Whanganui (Horizons) Regional Council

SUBMISSION ON: Proposed Change 3 – Urban Development

Submissions must be received at Horizons by 5pm 15 November 2022

Please note that the RMA requires all submissions and accompanying data to be made available for public inspection. They will be published on Council's website and included in Council documents that are available to the public following close of the submission period. Submissions will be published on the Horizons website and in documents that are available to the public, following the close of the submission period.

- Please post your submission to Private Bag 11025 Manawatū Mail Centre, Palmerston North 4442; or
- Deliver your submission to the Horizons offices at 11-15 Victoria Avenue, Palmerston North; or
- Please email your submission to submissions@horizons.govt.nz.

SUBMITTER DETAILS

Full name: **Transpower New Zealand Limited**

Email: **environment.policy@transpower.co.nz**
(Please note that Horizons will use this email address to correspond with you during the plan change, unless an alternative method of service is indicated below.):

Postal address: **31 Gilberthorpes Road, Islington 8042, Christchurch**

(Or alternative method of service under section 352 of the Resource Management Act).

Preferred contact number (daytime): **Trudi Burney – Senior Environmental Planner**

2022/EXT/1769

SUBMISSION DETAILS

(If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.)

☐ Yes ☒ No

I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition.

☒ Yes ☐ No

The specific provisions of the proposal that my/our submission relates to are as follows (*please list the provision*):

Refer attached

My submission is that (state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons):



horizons
REGIONAL COUNCIL



one plan
mo te iti mo te rahi

SUBMISSION FORM

ON PROPOSED CHANGE 3

I have attached 13 additional pages of submission content.

I seek the following decision from the Manawatū-Whanganui (Horizons) Regional Council
(please give precise details):

Refer attached

I wish to be heard in support of my submission.
(Only submitters who indicate they wish to be heard will be sent a copy of the planning report.)

☒ Yes ☐ No

If others make a similar submission I will consider presenting a joint case with them at a hearing.

☐ Yes ☒ No

SIGNATURE

Signature*:

Date: 9 Nov 2022

*Your signature or that of the person authorised to sign on behalf of the person making the submission

INFORMATION

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission by Transpower New Zealand Limited on Proposed Plan Change 3 to the Regional Policy Statement in the Manawatū-Whanganui Regional Council (Horizons) One Plan

Introduction to Transpower

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, the high voltage electricity transmission network for the country. The National Grid links electricity generators directly to major industrial users and distribution companies, feeding electricity to the local networks that distribute electricity to homes and businesses. The role of Transpower is shown in Figure 1 below.

The National Grid comprises towers, poles, lines, cables substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000 km of transmission lines and over 170 substations, supported by a telecommunications network of around 300 telecommunication sites, which help link together the components that make up the National Grid.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

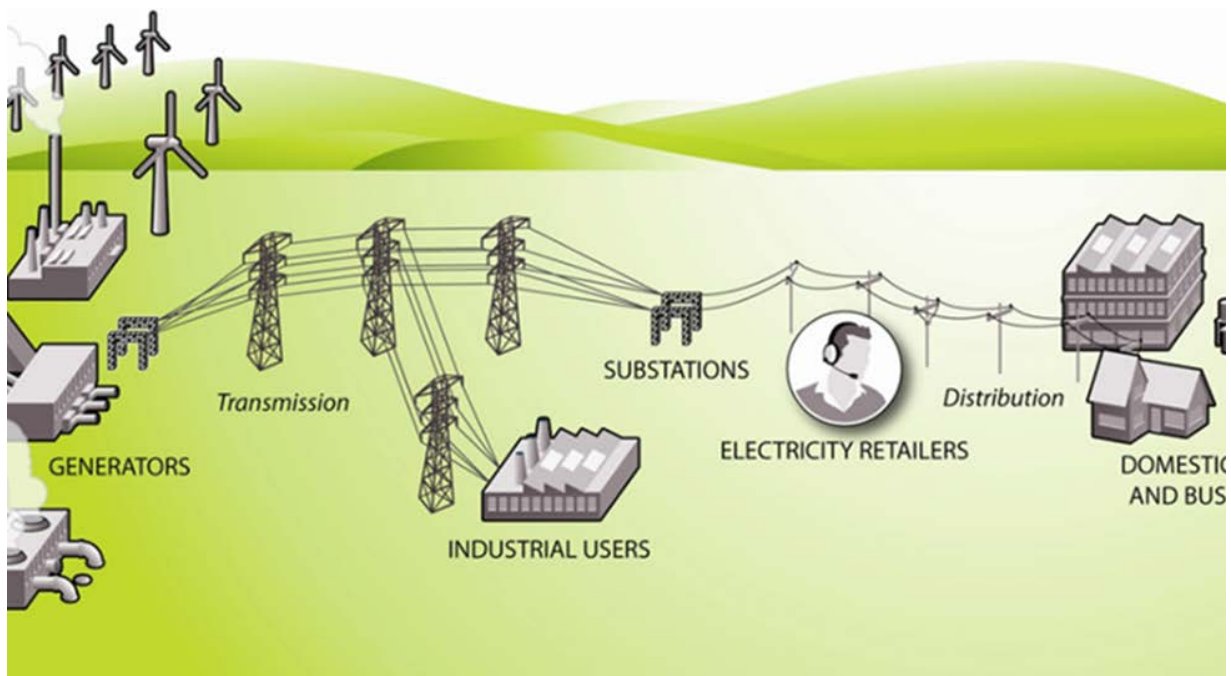


Figure 1. Role of Transpower in New Zealand's electricity industry. (Source: MBIE)

Transpower's role as outlined in its Statement of Corporate Intent for July 2022, states that:

Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users, and*
- As system operator, to operate a competitive electricity market and deliver a secure power system.*

In line with the above, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's "Whakamana i Te Mauri Hiko" predicts that electricity demand is likely to increase around 55% by 2050. Whakamana i Te Mauri Hiko suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which our zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed. Operational requirements are set out in legislation, rules and regulations that govern the National Grid, including the Electricity Act 1992, the Electricity Industry Participation Code, the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001), and the Electricity (Hazards from Trees) Regulations 2003.

Manawatu Wanganui Region Assets

Transpower's assets across the Manawātū-Whanganui region are numerous and include substations, communications sites, transmission lines and support structures (including the related telecommunications system). The transmission lines comprise 220kv and 110kv transmission lines on towers and poles. Refer to Appendix A for a map showing the location of the lines and substations.

There are a number of transmission lines within the wider region, being;

- Arapuni - Ongarue B 110kV transmission line on single circuit steel tower
- Bunnythorpe - Haywards A 220kV transmission line on single circuit steel tower
- Bunnythorpe - Haywards B 220kV transmission line on single circuit steel tower
- Bunnythorpe - Mangahao A 110kV transmission line on double circuit steel tower and single circuit single poles
- Bunnythorpe - Mangahao B 110/110kV transmission line on double circuit steel tower and single circuit single poles
- Bunnythorpe - Woodville B 110kV transmission line on double circuit steel tower
- Brunswick - Bunnythorpe A 220kV transmission line on double circuit steel tower
- Brunswick - Stratford A 220kV transmission line on double circuit steel tower

- Brunswick - Stratford B 220kV transmission line on single circuit steel tower
- Fernhill - Woodville A 110kV transmission line on Single circuit single pole and pi poles
- Fernhill - Woodville B 110kV transmission line on Single circuit single pole and pi poles
- Huntly - Taumarunui A 220kV transmission line on double circuit steel tower
- Stratford - Taumarunui A 220kV transmission line on double circuit steel tower
- Tangiwai - Tee A 220kV transmission line on double circuit steel tower
- Tararua Wind Central - Tee A 220kV transmission line on single pole
- Bunnythorpe - Ongarue A 110kV transmission line on single circuit steel tower
- Bunnythorpe - Whakamaru A 220kV transmission line on single circuit steel tower
- Bunnythorpe - Whakamaru B 220kV transmission line on single circuit steel tower
- Bunnythorpe - Wairakei A 220kV transmission line on single circuit steel tower
- Mangamaire - Masterton A 110kV transmission line on single pole
- Mangamaire - Woodville A 110kV transmission line on single pole
- Wanganui - Stratford A 110kV transmission line on single circuit pi pole, single pole and single circuit steel tower
- Bunnythorpe - Wanganui B 110kV transmission line on single and double circuit steel towers
- National Park - Retaruke A 110kV transmission line in single and pi poles
- Bunnythorpe - Wilton A 220kV transmission line on double circuit steel tower

There are a number of substations within the wider region, being;

- Bunnythorpe
- Brunswick
- Dannevirke
- Linton
- Mangamaire
- Mangahao
- Marton
- Mataroa
- National Park
- Ohakune
- Ongarue
- Taumarunui
- Tangiwai
- Tararua Wind Central
- Woodville
- Wanganui

In addition, there are a number of communication sites, being North Range Road East, North Range Road West, Te Paki, Palmerston North DO and Waiouru Repeater and two tee sites, being the Tararua Wind Central Tee and Retarukke Tee.

Collectively, these assets assist Transpower in servicing the Manawatū-Whanganui region, as well as the rest of New Zealand. The ongoing operation, maintenance, upgrading and development of these assets is essential to achieving wider social, economic, cultural and environmental benefits for the region. Transpower's electricity infrastructure must be sustainably managed, and any adverse effects on that infrastructure should be avoided, remedied or mitigated.

Of the four *urban environments*¹ identified in Proposed Plan Change 3 (“**PPC3**”) (being Feilding, Palmerston North, Levin and Wanganui) existing transmission lines only cross existing residential zoned land within Wanganui (noting Bunnythorpe is not considered an urban environment).

Statutory Framework

The National Policy Statement on Electricity Transmission (“**NPSET**”) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act (“**RMA**”) duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the National Grid. The NPSET only applies to the National Grid – the assets used, operated or owned by Transpower – and not to electricity generation or distribution networks. A copy of the NPSET is attached as **Appendix B**.

The one objective of the NPSET is as follows:

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *Managing the adverse environmental effects of the network; and*
- *Managing the adverse effects of other activities on the network.*

The NPSET’s Objective is implemented by fourteen policies. The policies must be applied by both Transpower and decision-makers under the RMA, as relevant. In a general sense these policies address the following:

- Policy 1: Recognising the benefits of the National Grid;
- Policy 2: Recognising and providing for the effective operation, maintenance, upgrading and development of the National Grid;
- Policies 3 to 5: Weighing the management of environmental effects against the operational constraints, site/route selection approach, and the requirements of existing assets;
- Policies 6 to 8: Reducing, minimising and avoiding adverse effects in differing contexts;
- Policy 9: Potential health effects;
- Policies 10 and 11: Managing adverse effects on the National Grid and providing for “buffer corridors”;
- Policy 12: Mapping the National Grid; and
- Policies 13 and 14: Long-term development and planning for transmission assets.

Section 62(3) of the RMA requires that a regional policy statement must ‘give effect’ to a National Policy Statement. Case law has established that the words “give effect to” means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

¹ Urban environment has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):

means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) is, or is intended to be, predominantly urban in character; and
- (b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.

It is therefore a requirement that regional policy reflects national direction and that the regional policy is effective in helping support the integrated management of natural and physical resources across the region as a whole.

Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“**NESETA**”) came into effect on 14 January 2010, providing a national framework of permissions and consent requirements for the operation, maintenance and upgrading of National Grid lines existing at 14 January 2010: it does not apply to substations or electricity distribution lines, and nor does it apply to the construction of new transmission lines (which are typically designated).

Under Section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan.

Transpower’s Submission on Proposed Plan Change 3 to the RPS

Transpower recognises that the purpose of PPC3 is to implement and support the National Policy Statement on Urban Development 2020 (NPS-UD). In enabling urban development, it is important that the operation, and maintenance and upgrade of infrastructure is not compromised, thereby reconciling the national policy direction of both instruments. Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the electricity transmission network. These policies are critical matters for a plan to address and are specifically relevant to PPC3.

Policy 10 is as follows:

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

Policy 11 relates to the development of buffer corridors, and is as follows:

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

For Transpower, the provisions of the RPS need to ensure the National Policy Statement on Electricity Transmission 2008 (NPSET) is given effect too. This may require wider changes than those within scope of PPC3. In context of PPC3, Transpower recognises that while existing National Grid assets only traverse residential areas within Wanganui, PPC3 also relates to urban growth and expansion (in addition to development and intensification) and therefore has wider relevance to existing National Grid assets beyond that of existing zoned urban areas.

Given the above statutory and policy framework, it is important given its national and regional significance, that the management of the National Grid is properly addressed in the Regional Policy Statement, particularly in context of the effects of urban development on the National Grid.

The following submission points relate to specific elements of Proposed Plan Change 3 to the Regional Policy Statement which are supported by Transpower, or others where amendments to specific provisions are sought.

Comments against specific proposed changes in PPC3 are set out in the table below. Amendments proposed through PPC3 as notified are shown as ~~black strikethrough~~ and underline text. Amendments sought through this submission are shown as ~~red strikethrough~~ and underline text. For the avoidance of doubt, all the points below include any consequential amendments.

Specific Plan Change Provision	Support/ Oppose/ Amend	Reasons	Amendment Sought
UDF Provisions - Objectives			
<p><u>UFD-O3: Urban form and function</u> <u>The intensification and expansion of urban environments*:</u> <u>(1) contributes to well-functioning urban environments* that</u> <u>(a) enable all people, communities and future generations to</u> <u>provide for their social, economic, and cultural wellbeing, and for</u> <u>their health and safety, now and into the future,</u> <u>(b) increase housing capacity and housing choice,</u> <u>(c) achieve a quality, sustainable and compact urban form that</u> <u>relates well to its surrounding environment,</u> <u>(d) are well connected by a choice of transport modes including</u> <u>public transport*, and</u> <u>(e) manage adverse environmental effects*.</u> <u>(2) enable more people to live in, and more businesses and</u> <u>community services* to be located in, areas of an urban</u> <u>environment* where:</u> <u>(a) it is in or near a centre zone* or other area with many</u> <u>employment opportunities, or</u> <u>(b) it is well-serviced by existing or planned public transport*, or</u> <u>(c) there is a high demand for housing or business land*, relative</u> <u>to other areas within that urban environment*.</u></p>	Amend	<p>Transpower supports the intent of Objective 3 in terms of the intensification and expansion of urban environments subject to the management of adverse environmental effects. While the objective is supported, in order to give effect to NPSET policies 10 and 11, an amendment is sought to the objective to specifically reference effects on nationally significant infrastructure (as defined in the NPS-UD 2020). Such recognition would align and reconcile the national policy direction relating to urban development and electricity transmission and provide a clear policy signal to district plan.</p> <p>As an alternative to reference to the effects on <i>nationally significant infrastructure</i>, Transpower would support the reference be confined to the National Grid.</p>	<p>Amend Objective UFD-O3 as follows:</p> <p><i>UFD-O3: Urban form and function</i> <i>The intensification and expansion of urban environments*:</i> <i>(1) contributes to well-functioning urban environments* that</i> <i>(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,</i> <i>(b) increase housing capacity and housing choice,</i> <i>(c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,</i> <i>(d) are well connected by a choice of transport modes including public transport*, and</i> <i>(e) manage adverse environmental effects*, and</i> <i>(f) manages the effects on nationally significant infrastructure*.</i> <i>(2) enable more people to live in, and more businesses and community services* to be located in, areas of an urban environment* where:</i> </p>
UDF Provisions - Policies			

Specific Plan Change Provision	Support/ Oppose/ Amend	Reasons	Amendment Sought
<p>UFD-P4: Urban intensification and expansion</p> <p><u>(1) Intensification and expansion of urban environments* is provided for and enabled in district plans^ where:</u></p> <p><u>(a) it contributes to a well-functioning urban environment*,</u></p> <p><u>(b) it provides for a range of residential areas that enable different housing types, site* size and densities that relate well to the surrounding environment,</u></p> <p><u>(c) higher density development is in close proximity to centre zones*, public transport*, community services*, employment opportunities, and open space,</u></p> <p><u>(d) development is well serviced by existing or planned development infrastructure* and public transport*, and additional infrastructure* required to service the development capacity* is likely to be achieved, and</u></p> <p><u>(e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.</u></p> <p><u>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it:</u></p> <p><u>(a) is adjacent to existing or planned urban areas,</u></p> <p><u>(b) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,</u></p> <p><u>(c) is well-connected along transport corridors,</u></p> <p><u>(d) manages adverse reverse sensitivity effects* on land with existing incompatible activities adjacent to the urban environment* boundary.</u></p>	Amend	<p>Policy 4 of PPC3 relates to urban intensification and expansion and is very directive in wording. Clause 1 of the policy relates to intensification and expansion, clause 2 is specific to expansion, clause 3 is specific to intensification and clause 4 relates to public transport.</p> <p>Transpower supports the intent of the policy but seeks amendment to provide consideration of the effects of intensification and expansion on the National Grid. Policies 10 and 11 of the NPSET have a very clear and directive policy requirement to avoid reverse sensitivity effects and ensure the National Grid is not compromised. Policy UFD-P4 as notified does not provide the policy recognition or give effect to the NPSET. An amendment to the proposed policy would also reconcile operative policy 3-2² of the RPS relating to adverse effects of other activities on infrastructure.</p> <p>The sought amendment is to clause 1 as the clause relates to both intensification and expansion.</p>	<p>Amend Policy UFD-P4 as follows:</p> <p><i>UFD-P4: Urban intensification and expansion</i></p> <p><i>(1) Intensification and expansion of urban environments* is provided for and enabled in district plans^ where:</i></p> <p><i>....</i></p> <p><i>(e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character- and</i></p> <p><i><u>(f) the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised.</u></i></p> <p><i>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it:</i></p> <p><i>(a) is adjacent to existing or planned urban areas,</i></p> <p><i>(b) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,</i></p> <p><i>(c) is well-connected along transport corridors,</i></p> <p><i>(d) manages adverse reverse sensitivity effects* on land with existing</i></p>

² <https://www.horizons.govt.nz/publications-feedback/one-plan/part-1-regional-policy-statement/chapter-3/3-4-policies>

Specific Plan Change Provision	Support/ Oppose/ Amend	Reasons	Amendment Sought
<p><u>(3) District plans^ applying to urban environments* must enable heights and density of urban form which are equal to the greater of:</u></p> <p><u>(a) demonstrated demand for housing and/or business use, or</u></p> <p><u>(b) the level of accessibility provided by existing or planned* active transport* or public transport* to areas with community services* and employment opportunities.</u></p> <p><u>(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*.</u></p>		<p>As an alternative to reference to the effects on nationally significant infrastructure, Transpower would support the reference be confined to the National Grid.</p>	<p><i>incompatible activities adjacent to the urban environment* boundary. <u>and (e) ensures the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised.</u></i></p> <p><i>(3) District plans^ applying to urban environments* must enable heights and density of urban form which are equal to the greater of:</i></p> <p>.....</p>
<p><u>UFD-P6: Significant development capacity* criteria</u></p> <p><u>(1) Unanticipated or out of sequence development will add significantly to development capacity* where:</u></p> <p><u>(a) the location, design and layout of the development will contribute to a well-functioning urban environment*,</u></p> <p><u>(b) the development is well-connected along transport corridors, and to community services*, and open space,</u></p> <p><u>(c) the development will significantly contribute to meeting demand for additional urban land identified in a Housing and Business Development Capacity Assessment*, or a shortfall identified by undertaking the monitoring requirements outlined in the National Policy Statement on Urban Development 2020, including meeting housing bottom lines*, or specific housing and price needs in the market,</u></p> <p><u>(d) the development will be realised in the short term* and before anticipated planned urban development,</u></p> <p><u>(e) there is adequate existing or upgraded development infrastructure* to support development of the land* without adverse effects* on the provision or capacity of other planned development infrastructure* including planned infrastructure* expenditure, and</u></p>	Amend	<p>Proposed policy UFD-P6 relates to development capacity and is supported in principle. Clause 1(f) of the policy relates to effect on infrastructure as a criterion for unanticipated or out of sequence development. While Transpower supports the effects on infrastructure as a criterion, it has concerns the reference in the criterion to “as far as reasonably practicable” does not give effect to the NPSET and is not sufficiently directive to ensure the operation, maintenance and upgrade of the National Grid is not compromised and adverse effects will not result.</p> <p>Transpower seeks amendment to the policy to give effect to the NPSET. This could be achieved by either inclusion of a comma so that the exclusion “as far as reasonably practicable” is confined to</p>	<p>Amend Policy UFD-P6 as follows:</p> <p><i>UFD-P6: Significant development capacity* criteria</i></p> <p><i>(1) Unanticipated or out of sequence development will add significantly to development capacity* where:</i></p> <p>.....</p> <p><i>(f) the development avoids adverse effects* on infrastructure^, and other physical resources of regional or national importance as far as reasonably practicable.</i></p> <p><i>(2) If the above criteria are met, the Regional Council and Territorial Authorities* must have particular regard to the contribution the development will have towards achieving UFD-P2.</i></p> <p>Or</p>

Specific Plan Change Provision	Support/ Oppose/ Amend	Reasons	Amendment Sought
<p><u>(f) the development avoids adverse effects* on infrastructure^ and other physical resources of regional or national importance as far as reasonably practicable.</u></p> <p><u>(2) If the above criteria are met, the Regional Council and Territorial Authorities* must have particular regard to the contribution the development will have towards achieving UFD-P2.</u></p>		<p>“other physical resources of regional or national importance” and not applied to infrastructure, or the exclusion be removed.</p>	<p>UFD-P6: Significant development capacity* criteria</p> <p>(1) Unanticipated or out of sequence development will add significantly to development capacity* where:</p> <p>.....</p> <p>(f) the development avoids adverse effects* on infrastructure^ and other physical resources of regional or national importance as far as reasonably practicable.</p> <p>(2) If the above criteria are met, the Regional Council and Territorial Authorities* must have particular regard to the contribution the development will have towards achieving UFD-P2.</p>
UDF Provisions - Definitions			
<p>Defintions</p> <p>Provide a definition of “nationally significant infrastructure”</p>	Amend	<p>In order to support the sought amendments to UFD-O3 and UFD-P4 Transpower seeks the inclusion of a definition of “nationally significant infrastructure” as provided in the NPS-UD.</p>	<p>Provide a definition of nationally significant infrastructure as follows:</p> <p><u>Nationally significant infrastructure has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</u></p> <p>(a) <u>State highways</u></p> <p>(b) <u>the national grid electricity transmission network</u></p> <p>(c) <u>.....</u></p>

Appendix A – National Grid assets within the Manawatu - Wanganui Region

Transpower Assets

Manawatu-Wanganui Region

Legend

Region

Boundary

NZ Roads

Highways

Transpower Assets

Cable Protection Zone

Overhead Fibre Cable

Underground Fibre Cables

Site

ACSTN

COMMS

HVDC

TEE

Transmission Line

0kV Overhead

11, 66kV Underground

11, 33, 66 kV Overhead

110kV Underground

110 kV Overhead

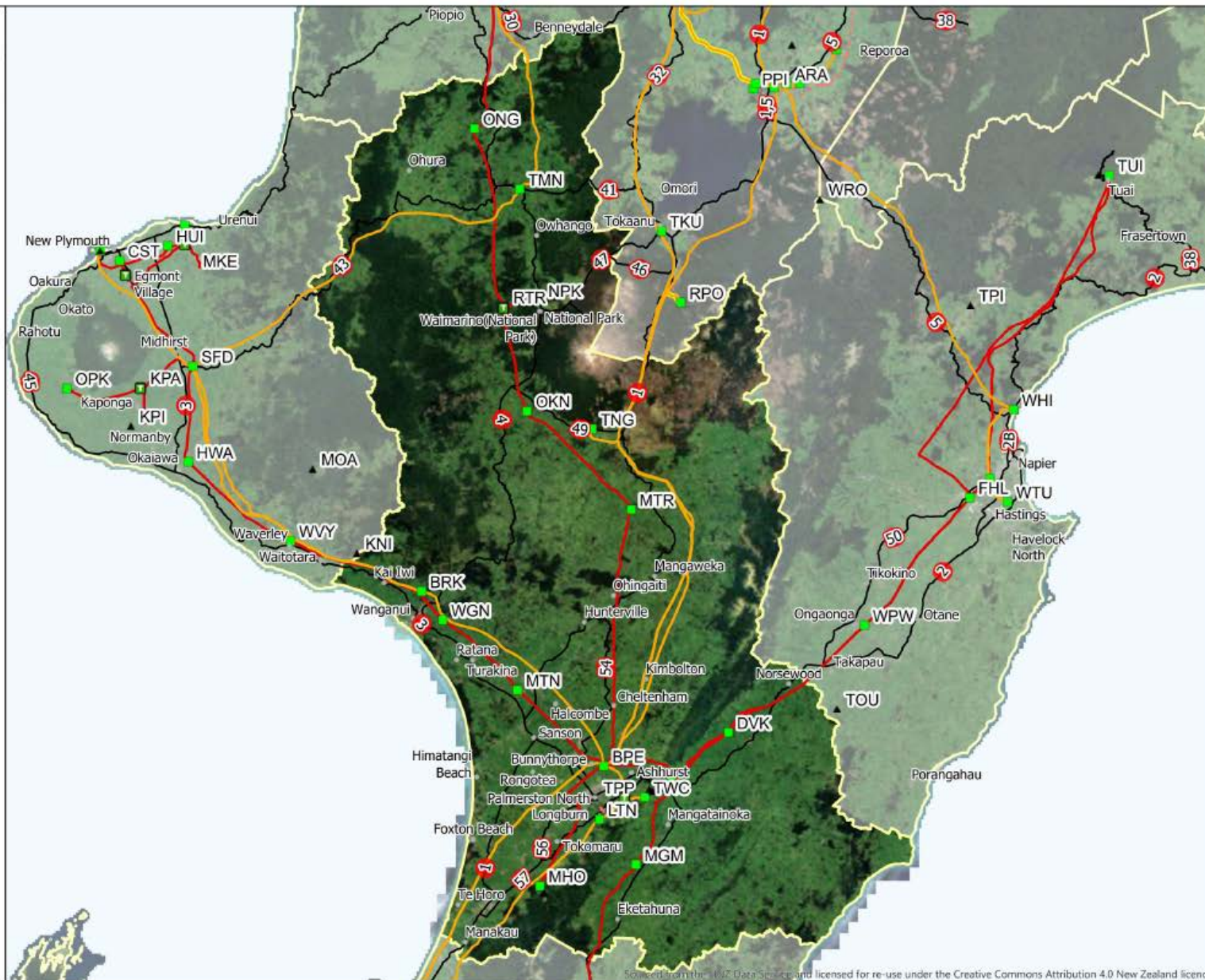
220kV Underground

220 kV Overhead

350 kV Overhead

350kV Submarine

400kV Overhead



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Appendix B – National Policy Statement on Electricity Transmission 2008

NATIONAL POLICY STATEMENT

on Electricity Transmission

Issued by notice in the Gazette on 13 March 2008

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Preamble

1. Title
2. Commencement
3. Interpretation
4. Matter of national significance
5. Objective
6. Recognition of the national benefits of transmission
7. Managing the environment effects of transmission
8. Managing the adverse effects of third parties on the transmission network
9. Maps
10. Long-term strategic planning for transmission assets

Preamble

This national policy statement sets out the objective and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.

In accordance with section 55(2A)(a) of the Act, and within four years of approval of this national policy statement, local authorities are to notify and process under the First Schedule to the Act a plan change or review to give effect as appropriate to the provisions of this national policy statement.

The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment. Electricity transmission has special characteristics that create challenges for its management under the Act. These include:

- Transporting electricity efficiently over long distances requires support structures (towers or poles), conductors, wires and cables, and sub-stations and switching stations.
- These facilities can create environmental effects of a local, regional and national scale. Some of these effects can be significant.
- The transmission network is an extensive and linear system which makes it important that there are consistent policy and regulatory approaches by local authorities.
- Technical, operational and security requirements associated with the transmission network can limit the extent to which it is feasible to avoid or mitigate all adverse environmental effects.
- The operation, maintenance and future development of the transmission network can be significantly constrained by the adverse environmental impact of third party activities and development.
- The adverse environmental effects of the transmission network are often local – while the benefits may be in a different locality and/or extend beyond the local to the regional and national – making it important that those exercising powers and functions under the Act balance local, regional and national environmental effects (positive and negative).
- Ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.

The national policy statement is to be applied by decision-makers under the Act. The objective and policies are intended to guide decision-makers in drafting plan rules, in making decisions on the notification of the resource consents and in the determination of resource consent applications, and in considering notices of requirement for designations for transmission activities.

However, the national policy statement is not meant to be a substitute for, or prevail over, the Act's statutory purpose or the statutory tests already in existence. Further, the national policy statement is subject to Part 2 of the Act.

For decision-makers under the Act, the national policy statement is intended to be a relevant consideration to be weighed along with other considerations in achieving the sustainable management purpose of the Act.

This preamble may assist the interpretation of the national policy statement, where this is needed to resolve uncertainty.

1. Title

This national policy statement is the National Policy Statement on Electricity Transmission 2008.

2. Commencement

This national policy statement comes into force on the 28th day after the date on which it is notified in the *Gazette*.

3. Interpretation

In this national policy statement, unless the context otherwise requires:

Act means the Resource Management Act 1991.

Decision-makers means all persons exercising functions and powers under the Act.

Electricity transmission network, electricity transmission and transmission activities/assets/infrastructure/resources/system all mean part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.

National environmental standard means a standard prescribed by regulations made under the Act.

National grid means the assets used or owned by Transpower NZ Limited.

Sensitive activities includes schools, residential buildings and hospitals.

4. Matter of national significance

The matter of national significance to which this national policy statement applies is the need to operate, maintain, develop and upgrade the electricity transmission network.

5. Objective

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- managing the adverse environmental effects of the network; and
- managing the adverse effects of other activities on the network.

6. Recognition of the national benefits of transmission

POLICY 1

In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:

- i) maintained or improved security of supply of electricity; or
- ii) efficient transfer of energy through a reduction of transmission losses; or
- iii) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or
- iv) enhanced supply of electricity through the removal of points of congestion.

The above list of benefits is not intended to be exhaustive and a particular policy, plan, project or development may have or recognise other benefits.

7. Managing the environmental effects of transmission

POLICY 2

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

POLICY 3

When considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network.

POLICY 4

When considering the environmental effects of new transmission infrastructure or major upgrades of existing transmission infrastructure, decision-makers must have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site and method selection.

POLICY 5

When considering the environmental effects of transmission activities associated with transmission assets, decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

POLICY 6

Substantial upgrades of transmission infrastructure should be used as an opportunity to reduce existing adverse effects of transmission including such effects on sensitive activities where appropriate.

POLICY 7

Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities.

POLICY 8

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

POLICY 9

Provisions dealing with electric and magnetic fields associated with the electricity transmission network must be based on the International Commission on Non-ionising Radiation Protection *Guidelines for limiting exposure to time varying electric magnetic fields (up to 300 GHz)* (Health Physics, 1998, 74(4): 494-522) and recommendations from the World Health Organisation monograph *Environment Health Criteria* (No 238, June 2007) or revisions thereof and any applicable New Zealand standards or national environmental standards.

8. Managing the adverse effects of third parties on the transmission network

POLICY 10

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

POLICY 11

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

9. Maps

POLICY 12

Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated.

10. Long-term strategic planning for transmission assets

POLICY 13

Decision-makers must recognise that the designation process can facilitate long-term planning for the development, operation and maintenance of electricity transmission infrastructure.

POLICY 14

Regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

Explanatory note

This note is not part of the national policy statement but is intended to indicate its general effect

This national policy statement comes into force 28 days after the date of its notification in the *Gazette*. It provides that electricity transmission is a matter of national significance under the Resource Management Act 1991 and prescribes an objective and policies to guide the making of resource management decisions.

The national policy statement requires local authorities to give effect to its provisions in plans made under the Resource Management Act 1991 by initiating a plan change or review within four years of its approval.



15 November 2022

Horizons Regional Council
Private Bag 11025
Palmerston North 4442

Email: oneplan@horizons.govt.nz

Subject: Submission from Waka Kotahi on Proposed Plan Change 3 to the Manawatu – Whanganui One Plan – Urban Development in response to the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) amendment Act 2021

Name of submitter: The New Zealand Transport Agency (Waka Kotahi)

This is a submission from Waka Kotahi on Manawatu – Whanganui Regional Council (Horizons) Proposed Plan Change 3 to the Manawatu-Whanganui One Plan – Urban Development. Plan change 3 proposes changes to the regional policy statement component of the One Plan to give effect to the National Policy Statement on Urban Development 2020 (NPS-UD).

Waka Kotahi wishes to be heard in support of this submission.

If others make a similar submission, Waka Kotahi may consider submitting a joint case.

Waka Kotahi does not gain a trade advantage through this submission.

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (LTMA). The objective of Waka Kotahi is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi roles and responsibilities include:

- Managing the state highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

Waka Kotahi interest in this plan change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the state highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy,

infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. For these reasons, Waka Kotahi seeks full utilisation of the tools available to Council to enable development in the most accessible urban areas.

Waka Kotahi view on the Proposal

Waka Kotahi generally supports Proposed Plan Change 3 to the Manawatu-Whanganui One Plan - Urban Development in implementing the National Policy Statement on Urban Development (NPS-UD). The alignment of the Regional Policy Statement with the NPS-UD supports the transport outcomes that can be delivered through a well-functioning urban environment, this includes:

- reducing the need to travel and/or the time or distance travelled by car, while improving or maintaining accessibility
- supporting a shift from cars to lower-emission types of travel (e.g. public transport, cycling and walking)
- enabling a density that supports an effective and efficient public transport system.

Waka Kotahi appreciates the opportunity to submit on Proposed Plan Change 3 (with further details provided in Table 1 below) and looks forward to continuing to work with Council on these issues.

Yours faithfully

Signature of the person authorised to sign on behalf of the submitter



Kathryn Millar-Coote
Team Lead Central

Address for service:

Attention: Kim Harris Cottle

EnvironmentalPlanning@nzta.govt.nz

Table 1 – Submission points on the Manawatu-Whanganui One Plan – Urban Development, Proposed Plan Change 3 – Enabling Intensification in Residential and Commercial Areas

Point #	Topic	Plan Provision	Reason for Comment	Change(s) sought
1	Entire Plan Change	Entire Plan Change	Waka Kotahi generally supports Proposed Plan change 3 in enabling and implementing the increased urban densities required in the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified subject to amendments requested in Waka Kotahi submissions.
2	Urban form and development: Issues	UFD-I1 Strategic planning and land use	Waka Kotahi supports this issue as it recognises the essential link between integrated land use infrastructure planning and achieving a well-functioning environment as defined under the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
3	Urban form and development: Issues	UFD – I3 Demand for housing, business land, infrastructure and community services	Waka Kotahi supports this issue as it recognises the essential link between integrated land use and infrastructure planning and achieving a well-functioning environment as defined under the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
4	Urban form and development: Objectives	UFD-O1 Strategic planning and urban development	Waka Kotahi supports this objective as it requires integrated land use and infrastructure planning and implements the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
5	Urban form and development: Objectives	UFD-O3 Urban form and function	Waka Kotahi supports this objective as it recognises the importance of a well-functioning urban environment as defined under the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
6	Urban form and development: Objectives	UFD-O5 Urban development and climate change.	Waka Kotahi supports this issue as it implements the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.

7	Urban form and development: Policies	UFD-P1 Integration of infrastructure with land use	Waka Kotahi supports this issue as it recognises the importance of integrating transport investment decisions with land use planning and implements the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
8	Urban form and development: Policies	UFD-P2 Providing sufficient development capacity	Waka Kotahi supports the provision of sufficient development capacity in accordance National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
9	Urban form and development: Policies	UFD-P4 Urban intensification and expansion	Waka Kotahi generally supports this policy subject to amendments to recognise the importance of connecting active and public transport modes and transport corridors to provide a well-functioning urban environment.	<p>Support with amendment to UFD-P4:</p> <p><i>(1)(d) development is well serviced by existing or planned development infrastructure*, <u>active and public transport*</u>, and additional infrastructure* required to service the development capacity*...</i></p> <p><i>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it:</i></p> <p><i>(c) is well-connected <u>by a variety of transport modes and along</u> transport corridors,</i></p> <p><i>(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* <u>infrastructure</u>.</i></p>

10	Urban form and development: Policies	UFD-P5 Built forms	Waka Kotahi supports this issue as it implements the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
11	Urban form and development: Policies	UFD-P6 Significant development capacity criteria	Waka Kotahi supports this policy and requests minor amendments to 1(b) to ensure that the connectivity of active and public transport modes and transport corridors, and commercial services (including employment opportunities) is considered when considering unanticipated or out of sequence development.	Support with amendment to UFD-P6: <i>(1) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: (b) is well-connected <u>by a variety of transport modes and along transport corridors, and to community and commercial services, and open space, ...</u></i>
12	Urban form and development: Policies	UFD-P7 Hapū and iwi involvement in urban development	Waka Kotahi supports Iwi and Hapū being involved in planning processes and a partnership approach to achieving Treaty of Waitangi principles.	Retain as notified
13	Urban form and development: Policies	UFD-P8 Urban development and climate change	Waka Kotahi supports this policy as it recognises the role of public and active transport in reducing greenhouse gas emissions and improving resilience in accordance with the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.
14	Urban form and development: Methods	Methods	Waka Kotahi supports the methods to implement the policies in this chapter as they align with the requirements of the National Policy Statement Urban Development 2020 (NPS UD).	Retain as notified.

SUBMISSION FORM

ON PROPOSED CHANGE 3

TO: Manawatū-Whanganui (Horizons) Regional Council

SUBMISSION ON: Proposed Change 3 – Urban Development

Submissions must be received at Horizons by 5pm 15 November 2022

Please note that the RMA requires all submissions and accompanying data to be made available for public inspection. They will be published on Council's website and included in Council documents that are available to the public following close of the submission period. Submissions will be published on the Horizons website and in documents that are available to the public, following the close of the submission period.

- Please post your submission to Private Bag 11025 Manawatū Mail Centre, Palmerston North 4442; or
- Deliver your submission to the Horizons offices at 11-15 Victoria Avenue, Palmerston North; or
- Please email your submission to submissions@horizons.govt.nz.

SUBMITTER DETAILS

Full name: Ministry of Education Te Tāhuhu o Te Mātauranga

Email: zach.chisam@beca.com
(Please note that Horizons will use this email address to correspond with you during the plan change, unless an alternative method of service is indicated below.):

Postal address: Beca Ltd (agent acting on behalf of Te Tāhuhu o Te Mātauranga)
85 Molesworth Street, Thorndon, Wellington 6011

(Or alternative method of service under section 352 of the Resource Management Act).

Preferred contact number (daytime): +64 4-460 1775

2022/EXT/1769

SUBMISSION DETAILS

(If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.)

☐ Yes ☒ No

I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition.

☐ Yes ☒ No

The specific provisions of the proposal that my/our submission relates to are as follows (*please list the provision*):

Please see attached

My submission is that (state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons):

.....
Please see attached

SUBMISSION FORM

ON PROPOSED CHANGE 3

I have attached ⁶ additional pages of submission content.

I seek the following decision from the Manawatū-Whanganui (Horizons) Regional Council
(please give precise details):

Please see attached

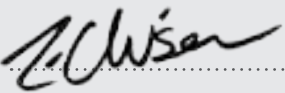
I wish to be heard in support of my submission.
(Only submitters who indicate they wish to be heard will be sent a copy of the planning report.)

☒ Yes ☐ No

If others make a similar submission I will consider presenting a joint case with them at a hearing.

☐ Yes ☒ No

SIGNATURE

Signature*: 

Date: 11th November 2022

*Your signature or that of the person authorised to sign on behalf of the person making the submission

INFORMATION

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991.

To: Manawatū-Whanganui (Horizons) Regional Council

Name of submitter: **Ministry of Education** Te Tāhuhu o Te Mātauranga ('the Ministry')

Address for service: C/-Beca Ltd,
85 Molesworth Street,
Thorndon,
Wellington 6011

Attention: Zachary Chisam

Phone: 04-460 1775

Email: zach.chisam@beca.com

This is a submission on Horizons Regional Council – Proposed Plan Change 3 (PPC3)

Background

Thank you for the opportunity to submit on the PPC3. The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Manawatū-Whanganui region.



Overview:

PPC3 to Horizons Regional Council One Plan is seeking to introduce changes to the Regional Policy Statement (RPS) to give effect to the National Policy Statement on Urban Development (NPS-UD), by:

- Creating an overarching framework and setting out objectives and policies for the provision of sufficient development capacity to meet the expected demand for housing and business land, and for the planning of well-functioning urban environments.
- Improving the responsiveness and competitiveness of land and development markets.
- Improving resilience to climate change.
- Ensure planning decisions relating to urban environments take into account the Te Tiriti o Waitangi.
- Providing clear guidance to territorial authorities around urban intensification.

The Ministry of Education's submission is:

Future school network impacts:

The Ministry is generally supportive of the changes introduced by PPC3 outlined in Appendix 1.

Over time, the changes made to the RPS will contribute to providing additional housing stock within the districts of the Manawātū-Whanganui region. This will require additional capacity in the school networks to cater for this growth. As Manawātū-Whanganui develops, there may also be a need for additional schools throughout the region in the future. The Ministry therefore has an interest in ensuring the RPS specifically acknowledges educational facilities. This is critical given schools are an essential piece of social and community infrastructure. An absence of supportive provisions can place obstacles in the way of the establishment of schools in the future.

The Ministry understands that the Council must meet the requirements under the NPS-UD to provide for additional development capacity for housing and businesses. Policy 10 of the NPS-UD states that local authorities should engage with providers of development infrastructure and additional infrastructure (such as schools) to achieve integrated land use and infrastructure planning. In addition to this, subpart 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure required to service the development capacity is likely to be available.

The proposed change to the RPS in relation to additional infrastructure broadly align with the NPS-UD and will allow development to be supported by additional infrastructure in an integrated and efficient manner. This will ensure the district plans that sit under the RPS will also enable the development of additional infrastructure, such as schools, to be provided to meet the needs and demand of local communities.

Objectives and policies:

The Ministry broadly supports the provisions in PPC3 that seek to put in place a framework that provides guidance on managing urban growth and development in a planned manner. This ensures that there is sufficient development capacity to meet housing and business demand and is supported by integrated planning and infrastructure (including additional infrastructure).



PPC3 as it is currently drafted, will enable greater intensification that may require more schools in the future to support the anticipated growth. Therefore, the Ministry is supportive of the amendment of an existing policy and the inclusion of a new supporting policy and defining additional infrastructure.

These are outlined in Appendix 1 to this submission.

Decision sought

The Ministry is supportive on PPC3 in its current form in relation to the provisions outlined in Appendix 1.

Council's amendments as part of PPC3 are shown in **black**. Additions are shown as underlined and deletions as ~~strikeouts~~.

The Ministry wishes to be heard in support of its submission.

Zachary Chisam
Planner- Beca Ltd
(Consultant to the Ministry of Education)
Date: 11 November 2022

Appendix 1 - The Ministry of Education's Submission on the Horizons Regional Council PPC3

Additions are shown as underlined and deletions as ~~strikeouts~~. Council's amendments as part of IPI are shown in black.

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/	Reason for Submission	Comment
1.	UFD-I1	<p>The strategic integration of infrastructure with <u>Strategic planning and land use</u></p> <p>Urban growth that is not strategically <u>Poorly planned urban development</u> can result in the piecemeal, uncoordinated and inefficient provision of development, <u>development infrastructure and associated additional infrastructure</u>. This does not contribute to a well-functioning urban environment, can create adverse environmental effects and will make it more difficult for urban development to meet the needs of current and future communities.</p>	Support	The Ministry supports the proposed changes to UDF-I1 as it recognises the need for planned urban growth to avoid poorly planned urban development's creating uncoordinated and inefficient developments, and development of infrastructure (including additional infrastructure, such as schools).	Retain as proposed.
2.	UFD-O1	<p>The strategic integration of infrastructure with land use <u>Strategic planning and urban development</u></p> <p>Strategic planning for urban development ensures that occurs in a strategically planned manner which allows for the adequate and timely supply of land^ and associated infrastructure:</p> <ol style="list-style-type: none"> <u>sufficient development capacity and land supply for housing and business uses is provided to support growth,</u> <u>new development, development infrastructure and additional infrastructure are provided in a coordinated, integrated and efficient manner,</u> <u>the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and</u> <u>competitive land and development markets are supported in ways which improve housing affordability.</u> 	Support	<p>The Ministry supports the proposed changes to UFD-O1 to give effect to the NPS-UD. The proposed changes ensure that there is sufficient development capacity to support growth and is supported by the capacity of infrastructure and additional infrastructure to service this growth. Schools are an essential component of social infrastructure that is required to support the needs and demand of growing communities.</p> <p>Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes schools) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).</p> <p>The Ministry supports that the proposed amendments will allow for additional infrastructure to service the growth that PCC3 will enable.</p>	Retain as proposed.
3.	<u>UFD-P4</u>	<p><u>Urban intensification and expansion</u></p> <p>(1) <u>Intensification and expansion of urban environments is provided for and enabled in district plans where:</u></p>	Support	The Ministry supports the proposed inclusion of UFD-P4 to ensure that the development capacity of urban environments is maximised and coordinated. UFD-P4 also provides greater flexibility, choice and opportunities to provide varied housing types, including more affordable	Retain as proposed.

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/	Reason for Submission	Comment
		<p>a) <u>it contributes to a well-functioning urban environment.</u></p> <p>b) <u>it provides for a range of residential areas that enable different housing types, site size and densities that relate well to the surrounding environment.</u></p> <p>c) <u>higher density development is in close proximity to centre zones, public transport, community services, employment opportunities, and open space.</u></p> <p>d) <u>development is well serviced by existing or planned development infrastructure and public transport, and additional infrastructure required to service the development capacity is likely to be achieved, and</u></p> <p>e) <u>it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.</u></p> <p>(2) <u>In addition to meeting the criteria in (1) above, the expansion of urban environments must only occur where it:</u></p> <p>a) <u>is adjacent to existing or planned urban areas.</u></p> <p>b) <u>will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource.</u></p> <p>c) <u>is well-connected along transport corridors.</u></p> <p>d) <u>manages adverse reverse sensitivity effects on land with existing incompatible activities adjacent to the urban environment boundary.</u></p> <p>(3) <u>District plans applying to urban environments must enable heights and density of urban form which are equal to the greater of:</u></p> <p>a) <u>demonstrated demand for housing and/or business use, or</u></p> <p>b) <u>the level of accessibility provided by existing or planned active transport or public transport to areas with community services and employment opportunities.</u></p> <p>(4) <u>Local authority transport plans and strategies must establish ways to contribute to well-functioning urban</u></p>		options whilst ensuring that current and planned infrastructure (including additional infrastructure) can service the development capacity and demands of growing communities.	

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/	Reason for Submission	Comment
		<u>environments through the provision of public transport services and by enabling active transport.</u>			
4.	<u>New Definition</u>	<p><u>Additional Infrastructure</u></p> <p><u>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</u></p> <p><u>means:</u></p> <ul style="list-style-type: none"> (a) <u>public open space</u> (b) <u>community infrastructure as defined in section 197 of the Local Government Act 2002</u> (c) <u>land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities</u> (d) <u>social infrastructure, such as schools and healthcare facilities</u> (e) <u>a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)</u> (f) <u>a network operated for the purpose of transmitting or distributing electricity or gas</u> 	Support	The Ministry is supportive of the proposed inclusion of a definition for additional infrastructure, which includes schools, as defined under the NPS-UD. Schools are valuable social infrastructure that support communities' social, economic and cultural wellbeing and contribute to high standard of living.	Retain as proposed.

Submission 4



15 November 2022

To: Horizons Regional Council (**Council**)

Subject: Submission on Proposed Change 3 (**PC 3**) to the Horizons Regional Council One Plan

Scope and nature of submission

1. KiwiRail welcomes the opportunity to provide feedback on PC 3.
2. KiwiRail generally supports the intent of PC 3 and its proposed amendments to ensure appropriate consideration of well-functioning urban environments and climate resilience. The specific provisions of PC 3 that KiwiRail supports or seeks amendments to are outlined in the table attached as **Annexure A**.
3. KiwiRail could not gain an advantage in trade competition through this submission.
4. KiwiRail wishes to be heard in support of this submission.

KiwiRail's operations

5. KiwiRail is the State-Owned Enterprise responsible for the construction, maintenance and operation of New Zealand's rail network. KiwiRail is also a Requiring Authority that holds railway purpose designations in District Plans throughout New Zealand.
6. The railway network is a nationally and regionally significant infrastructure asset critical to the safe and efficient movement of freight and passengers throughout New Zealand, and an essential part of the national transportation network and the wider supply chain. As noted in PC3, Feilding, Palmerston North, Levin and Whanganui are the key urban environments in the Horizons Region, and the railway passes through them all.
7. Transport modal shifts to more climate-friendly modes of transport, like rail, are critical to reduce carbon emissions. As a result, rail is experiencing a renaissance as evidenced by the significant investment being made by the Government to reinvigorate the network, demonstrating a strong and continued confidence in the current and future potential of rail services.
8. The ongoing safe and efficient functioning of the rail network is important to the Manawatu-Whanganui region's transport system and its connectivity to the upper and central North Island. Specifically, the network in the region includes:
 - The North Island Main Trunk which is of national and regional significance as the main freight line from Wellington Railway Station to Auckland, also providing connections to Taranaki and the Hawkes Bay. Frequent passenger services operate to Palmerston North and Auckland



- The Palmerston North Gisborne Line connecting the central North Island to the Port of Napier
- The Marton New Plymouth Line connecting to the port at New Plymouth
- and all related depots, yards and terminals.

Urban Development capacity

9. The primary driver of PC 3 is for the RPS to give effect to the requirements of the National Policy Statement on Urban Development (**NPS-UD**) and address the lack of urban development capacity. KiwiRail supports urban development around transport nodes and recognises the benefits of co-locating housing near transport corridors. An integrated approach to planning is critical to support well-functioning urban environments, as well as to ensure that our transport network can support increasing urban development.
10. It is critical that PC 3 adequately manages the interface between urban development and critical infrastructure, such as the railway network. Such management is necessary to ensure communities are built with healthy living environments, and the railway network can operate and continue to develop in the future without constraint.
11. The nature of railway operations means KiwiRail cannot fully internalise all its effects within the railway corridor boundaries. Increasing development around railway corridors consequentially means the introduction of more sensitive receivers to adverse effects of existing and lawful railway activities. With an increase in sensitive activities there is an increased risk of reverse sensitivity effects.
12. Reverse sensitivity is a well-established planning principle that refers to the susceptibility of established effects-generating activities to complaints or objections arising from new sensitive activities locating in close proximity to these activities. Such complaints can potentially constrain KiwiRail's ongoing operations, as well as future development.
13. Given the railway corridor intersects with cities and townships in the region, there is the potential for reverse sensitivity effects to arise from the operation of the railway corridor and this needs to be recognised. For this reason, it is essential that PC 3 appropriately manages the development of new sensitive activities in proximity to the railway corridor.

General reasons for the submission

14. For the provisions of PC 3 that KiwiRail supports in **Annexure A**, those provisions will:
 - (a) promote sustainable management of resources, achieve the purpose of the RMA, and are not contrary to Part 2 and other provisions of the RMA;
 - (b) provide and promote the greatest health and amenity outcomes and preserve operational and developmental capacity for nationally and regionally significant infrastructure;
 - (c) enable the social, economic and cultural wellbeing of the communities within the Manawatu -Whanganui region; and
 - (d) meet the reasonably foreseeable needs of future generations.

15. For those provisions of PC 3 that KiwiRail opposes in **Annexure A**, those provisions will not (without the amendments proposed by KiwiRail):

- (a) promote or enable efficient use and development of railway infrastructure and the operation of the railway corridor;
- (b) adequately protect and provide for KiwiRail's current and future operations in the region;
- (c) promote sustainable management of resources or achieve the purpose of the RMA, and are contrary to Part 2 and other provisions of the RMA;
- (d) promote or enable the social and economic wellbeing of the Manawatu - Whanganui regional community or reasonably need the needs of future generations; and
- (e) provide positive health and amenity outcomes for people locating in proximity to the railway corridor.

Relief Sought

16. KiwiRail seeks the following amendments:

- (a) that the proposed provisions be retained, deleted, or amended as set out in KiwiRail's submission (set out above and in **Annexure A**); and
- (b) such further or other consequential relief as may be necessary to fully give effect to the relief sought in this submission and **Annexure A**.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Pam Butler', with a stylized, cursive script.

Pam Butler
Senior RMA Advisor
KiwiRail Holdings Limited

ANNEXTURE A

PROVISION	SUPPORT/ OPPOSE	REASONS FOR KIWIRAIL'S SUBMISSION	RELIEF SOUGHT (OR WORDING TO SIMILAR EFFECT) Proposed changes as notified shown as <u>underline</u> , and deleted text shown as strikethrough Further changes proposed in this submission shown as <u>underline</u> , and deleted text shown as strikethrough . Quoted text from PC 3 is in <i>italics</i> .
UFD-Issue 01	Seek amendment	KiwiRail supports the description of this issue, but considers an amendment is required to recognise urban development and land use changes can result in reverse sensitivity effects, and that the interfaces between conflicting land uses must be appropriately managed. The RPS already notes that 'that some infrastructure and other physical resources are regionally or nationally important. The establishment, operation*, maintenance* and upgrading* of infrastructure and infrastructure corridors is critical to the economic wellbeing of the Region and the nation'. It further notes that other activities can have reverse sensitivity adverse effects on infrastructure (RPS 3.1 scope and background).	Amend UFD – Issue 01 to read as follows <i>Poorly planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, development infrastructure* and additional infrastructure. <u>It can also have the potential to create land use conflicts and reverse sensitivity effects.</u> This does not contribute to a well-functioning urban environment, can create adverse environmental effects* and will make it more difficult for urban development to meet the needs of current and future communities.</i>
UFD-Issue 03	Seek amendment	KiwiRail considers express recognition of reverse sensitivity effects is necessary to ensure development near transport corridors can co-exist in an appropriate way. KiwiRail considers that express recognition is needed for the consideration of reverse sensitivity effects which must be carefully managed when providing for well-functioning urban environments.	Amend UFD-Issue 03 to read as follows <i>A growing population increases demand for housing, business land, Infrastructure and community services. Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure planning and funding decisions, manages effects on the urban and natural environment, <u>avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors</u>, and improves resilience to the effects of climate change</i>
UFD-Objective 01	Seek amendment	KiwiRail supports the intent of UFD 01, including UFD-01 clause (2) however both planning and delivery need to be carefully managed to ensure that any effects at the interface of conflicting land uses, including reverse sensitivity effects, are appropriately managed. This is critical to recognise and provide for well-functioning urban environments in accordance with the direction in the NPS-UD.	Amend UFD- Objective 01 by adding an additional clause as follows <u>(5) land use conflicts are minimised as far as practicable, including avoiding the potential for reverse sensitivity effects.</u>
UFD-Objective 03	Support	KiwiRail supports Objective 03 to ' <i>enable all people, communities and future generations to provide</i>	Retain as proposed

		<i>for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future'. This objective is appropriate to give effect to Objective 1 of the NPS-UD and to recognise that providing for the health and well-being of our communities relies on having appropriate planning provisions in place, such as controls on development near the rail corridor.</i>	
UFD-Objective 05	Support	KiwiRail supports the new policy which requires urban environments to consider and choose solutions that will contribute to reducing greenhouse gas emissions.	Retain as proposed
UFD-Policy 01	Seek amendment	Efficient transport networks are a key infrastructure requirement for well-functioning communities. KiwiRail considers express recognition of reverse sensitivity effects is necessary to ensure development near transport corridors can co-exist in an appropriate way.	Add an additional clause to UFD- Policy 01 as follows <u>(3) ensure development avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.</u>
UFD-Policy 02	Seek amendment	KiwiRail supports the intent of Policy 2 but considers that express recognition is needed for the consideration of reverse sensitivity effects which must be carefully managed when providing for out-of-sequence urban growth.	Add an additional clause to UFD Policy 02 as follows <u>(4) The development avoids the potential for reverse sensitivity effects on the safe and efficient operation of infrastructure, including transport corridors.</u>
UFD-Policy 04	Seek amendment	<p>KiwiRail supports the new policy which requires district plans to provide for intensification where it is located near services, transport and employment opportunities. Some infrastructure due to its linear nature may need to traverse scheduled areas in order to maintain or enhance services. While scheduled locations are always considered as a constraint it may be appropriate to mitigate or off set urban or infrastructure development in these locations in order to achieve the plan's wider objectives. An amendment to clause (e) is proposed to enable this.</p> <p>Further, some unanticipated plan changes may not be adjacent to urban environment boundaries. KiwiRail considers that express recognition is needed for the consideration of reverse sensitivity effects both near the urban boundary and elsewhere when considering development under this policy. The deletion widens the clause's application.</p>	<p>Support with amendment to UFD Policy 04 (d) as follows</p> <p>(e) <i>it protects, <u>where practicable</u>, natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.</i></p> <p>d) <i>manages adverse reverse sensitivity effects on land with existing incompatible activities <u>or adjacent to the urban environment* boundary</u></i></p>

UFD- Policy 06	Support	KiwiRail supports the intent of Policy 6 to provide a framework that manages unanticipated or out of sequence development and supports clause (f) that expressly recognises and provide for the avoidance of adverse effects on infrastructure and other resources of regional or national importance which includes transport corridors.	Retain as proposed.
UFD - Policy 08	Support	KiwiRail supports UFD P8. Recognition of the benefits of regionally significant infrastructure including nationally and regionally significant railway infrastructure, particularly where it contributes to reducing greenhouse gas emissions, is supported by KiwiRail.	Retain as proposed
Appendix 3: Definitions Additional infrastructure	Support	KiwiRail supports the definition which includes railway corridors as provided for as land transport in the Land Transport Management Act 2003.	Retain as proposed
Appendix 3: Definitions Well-functioning urban environments	Support	KiwiRail supports the inclusion of a definition for "well-functioning urban environments" which is consistent with the NPS-UD.	Retain as proposed

Preliminary submission on proposed Plan Change 3: Urban Form and Development

Submitter Details

Full name: Ami Coughlan

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Preferred contact number: 06 359 0409

Wellington Fish and Game Council cannot gain an advantage in trade competition through this submission

Wellington Fish and Game Council wish to be heard in support of our submission.

Introduction.

- This is preliminary submission on the proposed Horizons Plan Change 3 – Urban Form and Development by Wellington Fish and Game Council (WFGC).
- WFGC is the statutory body responsible for the management of sports fish and gamebird resources in the Wellington Fish and Game region. This covers a large portion of the Horizons Regional Council's role.
- WFGC represents the interests of over 8000 licence holders (sports fish anglers and game bird hunters) in the region. Many of these licence holders are rate payers and Wellington Fish and Game expects that their interests and the interests of all ratepayers in the region are fairly represented in the plan for Horizon's future urban development and climate change preparedness.
- The protections of sports fish and game birds and their habitats are enshrined in current legislation. WFGC seeks explicit inclusion of protections of freshwater quality and quantity to be embedded into the Urban Form and Development Plan (UFD)
- WFGC requires application of the RMA/NPS laws into this proposed plan change which requires Regional Councils to protect freshwater fishery habitat and wetlands by creating planning processes in the urban design and development spheres which maintain and enhance freshwater bodies in the region and prepare for water abundance and scarcity cycles created by climate change.
- WFGC seeks to avoid the decoupling of urban development and climate resilience from freshwater management, coastal marine environments, and land management. Acknowledging the impact of the urban environment, particularly on aquatic ecosystems, is of primary importance to fully implement Te Mana o te Wai and the National Policy

Statement – Freshwater Management 2020 (NPS-FM), and the National Policy Statement – Urban Development 2020 (NPS-UD). WFGC therefore request additional editing to this proposed Plan Change 3 to include acknowledgement of the importance of infrastructure, coordination, and planning in urban development and design on restoring and enhancing freshwater ecosystems.

- All parts of the water system will require resilience adopting measures due to urban growth and climate change. Increasing drought will pressure water quantity and availability, population growth will increase demand of potable water, stormwater, and wastewater systems. Urban intensification increases surface impermeability and speeds run-off with pollutants into receiving water bodies. Increased rain intensity and / or duration will further stress storm and wastewater systems (Joynt, 2021). The RPS-UFD needs to clearly state how the urban development process will design and plan urban systems to counteract these impacts.
- At its heart, the NPS-UD 2020 requires councils to plan well for growth and ensure a well-functioning urban environment for all people, communities, and future generations (Ministry for the Environment, May 2022). While intending to remove overly restrictive barriers to urban development and intensification, every care must be taken to ensure those future generations are provided with an improved, more resilient, environment, and protections of freshwater quality, quantity, and biodiversity are paramount in achieving this.

Regional Policy Statement -Urban Form and Development

Article	Support or oppose	Decision sought	Reasons
UFD-I3	Support with amendments	Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure planning and funding decisions, manages the effects of growth, and leads to improvements in the urban and natural environment including freshwater , and improves resilience to the effects of climate change.	NPS – UD 2020 states that Future Development Strategies must be informed by all other national policy statements. Urban development policy which has the hierarchy of obligations of Te Mana o te Wai and the NPS-FM as core concepts will lead to ease of integrations and a focus on restorative development.
UFD-O1 (2)	Support with amendments	New development, development infrastructure and additional infrastructure are	Urban development policy which has the hierarchy of obligations of Te Mana o te Wai and

		provided in a coordinated, integrated, and efficient manner <i>which maintains or improves the natural environment including freshwater and increases resilience to climate change</i>	<p>the NPS-FM as core concepts will lead to ease of integrations and a focus on restorative development.</p> <p>To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions</p>
UFD-O3 (1)	Support with amendments	(e) manage adverse environmental effects <i>so impacted environments are improved and enhanced.</i>	<p>To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions. Improvements to freshwater and commitments to other national policy such as the NPS FM and Te Mana o te Wai will require rapid adaptations to development and infrastructure which manages water abstraction and degradation into a future where water quantity will be highly variable.</p>
UFD-P1 (2)	Support with amendments	Ensure there is coordination between the location, form, and timing of urban growth and the funding, delivery, and implementation of development structure <i>which helps</i>	<p>To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions. Improvements to</p>

		improve the natural environment.	freshwater and commitments to other national policy such as the NPS FM and Te Mana o te Wai will require rapid adaptations to development and infrastructure which manages water abstraction and degradation into a future where water quantity will be highly variable.
UFD-P8 (1)	Support with amendments	<p>Urban environments are developed in ways that reduce greenhouse gas emissions, improve resilience to the effects of climate change, and <i>reduce stress on and lead to improvements in freshwater ecosystems and the natural environment.</i></p> <p>(c) requiring best practice resilience to the impacts of climate change, including sea level rise, and any increases in the scale and frequency of natural hazard events, while giving effect to Te Mana o te Wai.</p>	<p>1) Water quantity is likely to be highly variable under future climate change, with impacts on drought and flooding, and wastewater, stormwater, and potable water. Urban development in a sustainable future then requires coordinated planning and design to mitigate the impacts of climate change on urban areas and populations, and ameliorate the impact of a growing population and expanding urban area on the environment.</p> <p>c) storm water, flood protections, abstractions and water storage must be integrated with national policy including the hierarchy of obligations of Te Mana o te Wai, and to ease confusion this should be explicitly stated in the RPS UFD.</p>

			Urban design cannot be developed at the expense of freshwater ecosystems.
Method 2 (b)	Support		Development infrastructure to include three waters infrastructure which reduces negative impacts on the receiving freshwater environment.
Method 3	Support		Stormwater, wastewater and other water infrastructure must be developed in a coordinated way to avoid adverse environmental effects caused by urban growth outstripping essential services.
UFD-PR3	Support	<p>"Provisions in this chapter also seek to ensure urban development positively impacts the quality of urban environments, the quality of life for residents, and the quality of the natural environment."</p> <p><i>This phrase should be emphasised throughout the Proposed Plan Change 3.</i></p>	This phrase helps integrate urban development with the natural environment, and should be integrated throughout the RPS UFD.
UFD-AER4	Support with amendments	Development infrastructure is in place in time to facilitate urban intensification or expansion <i>with no adverse environmental impacts caused, and remediation to existing damage where possible,</i>	To achieve well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions. Improvements to freshwater and commitments to other national policy such as

		<i>including to freshwater quality and quantity.</i>	the NPS FM and Te Mana o te Wai will require rapid adaptations to development and infrastructure which manages water abstraction and degradation into a future where water quantity will be highly variable.
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RPS – UFD Definitions.

Development infrastructure (a) for water supply, wastewater, or stormwater all have impacts, potential and actualised, on freshwater quantity and quality.

Decision sought: these needs cannot, and should not, be seen as separate from the requirements of Te Mana o te Wai, the NPS-FM, the RMA, and other national legislation and policies. As decisions made in this sphere will impact on freshwater ecosystems, decisions made here should be made in conjunction with statutory managers, stakeholders, and the wider community.

Well-functioning urban environments (f) are resilient to the likely current and future effects of climate change.

Decision sought: well-functioning urban environments require explicit methods to be developed which are science based and lead to water quality and quantity assurance, with primacy given to the health of the waterway first, and then human health needs as per Te Mana o te Wai. The literature review by Joynt (2021) gives several highly pertinent urban development designs which should be implemented into the Horizons One Plan UFD.

Future Development Strategies are required to implement national policy, including the NPS-FM 2020.

Aspects of the NPS-FM which are pertinent to urban development and climate change resilience includes the following sections:

Section 2.1.1	<p>The objective of this NPS is to ensure that natural and physical resources are managed in a way that prioritises:</p> <ul style="list-style-type: none"> 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, economical, and cultural well-being, now and in the future.
Section 2.2	<p>Policies</p> <ul style="list-style-type: none"> 1. Freshwater is managed in a way that gives effect to Te Mana o te Wai 2. Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.

	<ol style="list-style-type: none"> 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. 4. Freshwater is managed as part of NZ's integrated response to climate change 5. Freshwater is managed through a National Objectives Framework to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improve. 6. There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted. 7. The loss of river extent and values is avoided to the extent practicable 8. The significant values of outstanding water bodies are protected 9. The habitats of indigenous freshwater species are protected 10. The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9 11. Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided. 12. The national target (Appendix 3) for water quality improvement is achieved. 13. The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends. 14. Information (including monitoring data) about the state of water bodies and freshwater ecosystems, and the challenged to their health and well-being, is regularly reported on and published 15. Communities are able to provide for their social, economic, and cultural well-being in a way that is consistent with this NPS.
3.12 (1)	<p>In order to achieve the target attribute states for the attributes in Appendix 2A, every regional council:</p> <ol style="list-style-type: none"> a) Must identify limits on resource use that will achieve the target attribute state and any nitrogen and phosphorus exceedance criteria and instream concentrations set under clause 3.13, and include the limits as rules in its regional plan(s); and b) May prepare an action plan; and <p>May impose conditions on resource consents to achieve target attribute states.</p>

3.13	Every regional council must (at a minimum) set appropriate instream concentrations and exceedance criteria for dissolved inorganic nitrogen and dissolved reactive phosphorus
3.18 (1)	Every regional council must establish methods for monitoring progress towards achieving target attribute states and environmental outcomes

While these will be integrated into the One Plan later, decoupling them from the Urban development plan change may lead to confusion on implementation of resource consents, with queries over which 'chapter' of the plan takes precedence. For this reason, WFGC seeks to have responsibility of urban development to enhancing the health of land and aquatic ecosystems clearly stated throughout the RPS-UFD wherever appropriate.

WFGC also urgently requests the basic framework of Te Mana o te Wai, the RMA, and the NPS-FM be added to the RPD UFD to prevent any potential confusion leading to adverse environmental impacts, urban development delays, and avoidable extra costs in the future.

The NPS-UD 2020 must be incorporated into regional plans. The objectives, policies, and methods within it may be made more stringent by regional councils but cannot be weakened. As such, WFGC request the following objectives contained in the NPS UD to be stated with clarity within the proposed Plan Change 3:

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.

WFGC consider this must include environmental safety and sustainability, availability and access to freshwater and its resources, for intrinsic and consumptive uses.

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.

WFGC consider that this includes planning and design specifically to decrease negative impacts of urban design which leads to degraded freshwater bodies. These include, but are not limited to, water reuse, better stormwater and sewage design and implementation, reduction and removal of all industrial and urban pollutant inputs into waterways, urban design to slow water run-off, and 'green water' features.

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

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

It should be explicitly stated that this encompasses freshwater impacts, water use, storm and wastewater, and utilises urban planning, design, and development which has the improvement of these as primary objectives and future proofs them against climate change.

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

e) the likely current and future effects of climate change (water scarcity or excess, drought or flood)

Integrating urban development, climate change resilience and environmental sustainability into policy and planning is essential. A literature review by Joynt (2021) in response to the NPS -UD discusses key ideas on how to achieve this, and these ideas should be made explicitly clear throughout Horizons proposed Plan Change 3 to fulfil the function of responsive and responsible urban growth and development.

These ideas include:

- Including circular waste strategies, water conservation, and green buildings standards will reduce use of resources which may become increasingly scarce due to a changing physical and geopolitical climate.
- Improve potable water, wastewater, and stormwater systems to protect water environments
- Ecosystems services such as provisioning, regulating, habitat, supporting and cultural services offered by natural environments in urban settings should be valued for health, climate resilience, amenity, and cultural values, and explicitly included in policy and legal protections.
- Integrate water sensitive design, minimising water use and maximising water receiving environments, grey water systems and other waste minimising designs to be integrated and retrofitted into urban environments.
- Prioritise the principles of kaitiakitanga to restore and protect aquatic environments by using a high threshold for quality: e.g., the collection of kai moana, harvesting of healthy trout. Protections and restoration of habitat of indigenous and valued introduced species allow for enhanced biodiversity, which provide regulatory, provision, and cultural ecosystem services.
- River-centric flood protection strategies include house design to prevent flood water ingress, non-habitable ground floors of buildings in flood zones, swales and water sensitive urban design, allowing room for the river to flood, redirecting flood water onto playing fields and reed beds or wetlands to ease pressure on storm water systems, and green roof installations on buildings, alongside temporary physical flood barriers at neighbourhood scale.

Conclusion.

Our aquatic ecosystems are already compromised from existing urban development, and thus future policies, plans, and developments need to go further than maintenance of a substandard system. Enhancing and restoring freshwater and marine systems assists in regulating flooding risk, and provides potable water sources and food (Joynt, 2021). Urban development needs to place the health of the freshwater, marine, and land environments at the heart of all of its policies to enable a sustainable and resilient future.

References

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Form 5

Submission on Proposed Change 3 to the Regional Policy Statement in the One Plan

To: Manawatū-Whanganui (Horizons) Regional Council
submissions@horizons.govt.nz

Submitter details: Summerset Group Holdings Limited
PO Box 5187
Wellington 6140

This is a submission on the **Proposed Change 3** to the Regional Policy Statement in the One Plan.

Summerset Group Holdings Ltd (SGHL) could not gain an advantage in trade competition as a result of this submission.

The specific provisions of the proposal that the submission relates to, the submission points, reasons and decisions sought are set out in the attached table. SGHL seeks that the decisions sought in the attached table are adopted, or any other such relief and/or consequential amendments are made that achieve an equivalent outcome.

SGHL wishes to be heard in support of its submission. SGHL does not wish to present a joint case.

A handwritten signature in blue ink, appearing to read "Hannah McCashin".

Signed: _____
On behalf of Summerset Group Holdings Limited

Date: 15 November 2022

Address for Service:

Summerset Group Holdings Limited
C/- Hannah McCashin
Incite Resource and Environmental Management Ltd
hannah@incite.co.nz
022 0675 911

Submission introduction and summary

Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 6,600 residents living in our village communities. We operate Comprehensive Care villages that offer a range of independent living options and care, meaning that as our residents' needs change, we have support and options available within the village. Summerset has 35 villages which are either completed or in development, spanning from Whangārei to Dunedin. We employ over 1,800 staff members across our various sites. Summerset welcomes the opportunity to provide feedback to the Council on Proposed Change 3 (PC3) to the Regional Policy Statement in the One Plan, which responds to the National Policy Statement on Urban Development.

Retirement villages play a key role in addressing the housing crisis, and the retirement living and aged care crises. The development of affordable retirement village dwellings such as those provided by Summerset help reduce land demand pressure and make further residential housing available. This increase in housing supply helps to relieve pressure on the housing market and contributes towards improved housing affordability in the long term. Affordable housing and the realistic prospect of home ownership for younger generations provides the opportunity for more secure accommodation than renting, and long term investment opportunities.

Summerset developments have a higher population density than traditional residential development. The development of affordable retirement village dwellings reduces overall land demand pressure and makes further residential housing available, as new village residents release their properties to the market.

Retirement villages also have benefits in reduced transport demand from residents, consequential reductions in the use and demand for infrastructure, and climate benefits resulting from the overall density of villages and the aforementioned transport benefits.

Retirement villages are typically established on sites of up to 10 hectares in size. Summerset's forward planning for site selection needs to be responsive to both planned development areas and opportunity sites that may arise. Summerset's submission is therefore concerned with ensuring that PC3 does not unduly restrict land availability in a manner that would impact on the competitive operation of land markets, and that the RPS is cognisant of a range of development typologies and provides for those variations in land use.

National Policy Statement on Urban Development

The National Policy Statement on Urban Development (NPS-UD) is the driver for PC3.

Objective 1 of the NPS-UD states:

New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural well-being, and for their health and safety, now and into the future.

Retirement villages facilitate this objective by enabling people of retirement age to provide for their social and economic well-being and for their health and safety.

Objective 2 requires that planning decisions improve housing affordability by supporting competitive land and development markets. As noted above, Somerset is concerned that the RPS does not unduly restrict the competitive operation of land and development markets and provides for a range of development typologies, including retirement villages.

Objective 4 of the NPS-UD notes that urban environments will change over time, while Objective 7 requires that local authorities are responsive to proposals that would supply significant development capacity.

These objectives are then given effect to through the subsequent policies. Policy 1 defines 'well-functioning' urban environment which is relevant to matters identified in the following submission table, while Policy 8 requires local authority decisions to be responsive to plan changes that would add significant development capacity and contribute to well-functioning urban environments.

Somerset is concerned with ensuring that PC3 allows for the expansion of the urban environment, where appropriate, in order to continue to provide housing solutions in areas of demand.

Provision	Support/Oppose/Amend	Submission	Relief Sought
UFD-O1	Support	<p>UFD-O1(3) recognises and provides for the “<i>diverse and changing needs of people, communities, and future generations</i>”.</p> <p>It is important that a range of development typologies, including retirement villages, are provided for to cater to the specific and changing needs of retirement age people.</p> <p>Retirement villages facilitate this objective by providing a range of housing and care options, enabling people of retirement age to provide for their social and economic well-being and for their health and safety.</p>	Retain
UFD-O3(1)	Support	<p>UFD-O3(1)(a) seeks to “<i>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,</i>”.</p> <p>This objective reflects the importance of recognising and providing for the changing needs of populations, including those of retirement age, particularly through increasing housing choice.</p>	Retain
UFD-O3(2)	Amend	<p>The objective provides for the expansion of urban environments, however this is not reflected in clause 2, which refers only to “<i>areas of an urban environment</i>”, which are presumably existing.</p>	<p>Amend.</p> <p>To provide consistency amend clause 2 as follows:</p>

		Given that retirement villages are typically established on sites of at least 8ha and up to 10ha in size, and the scarcity of such areas in many existing urban environments, it is important to Somerset that flexibility is provided to expand beyond the existing urban environment, where appropriate.	<i>(2) enable more people to live in, and more businesses and community services* to be located in, areas of an urban environment* or through the expansion of an urban environment where:</i>
UFD-P2: Providing sufficient development capacity*	Amend	<p>The policy refers to urban expansion and out of sequence development, however the introduction refers to accommodating demand “in urban environments” only. This results in inconsistency within the provision.</p> <p>Furthermore, and as outlined above, it is important to Somerset that flexibility is provided to expand beyond the existing urban environment, where appropriate, due to the relatively large land area requirements for retirement villages.</p>	<p>Amend.</p> <p>Delete reference to “in urban environments” as follows:</p> <p><i>UFD-P2: Providing sufficient development capacity*</i></p> <p><i>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:</i></p>
UFD-P4: Urban intensification and expansion	Support	Somerset supports the recognition that the policy gives to “ <i>intensification and expansion of urban environments</i> ”, rather than intensification and expansion that only being provided for within existing urban environments.	Retain

UFD-P6: Significant development capacity* criteria	Amend	<p>The policy sets out criteria for the consideration of unanticipated or out of sequence development.</p> <p>Summerset supports the intention of this policy, however seeks recognition within the provision that the unanticipated or out of sequence development may be appropriate prior to the establishment of transport corridors, community services*, and open space.</p>	<p>Amend.</p> <p>(b) the development is, <u>or will be</u>, well-connected along <u>existing or anticipated</u> transport corridors, and to <u>existing or anticipated</u> community services*, and <u>existing or anticipated</u> open space</p>
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Submission 7

Horizons Regional Council

Sent via email to submissions@horizons.govt.nz

Attn: Robert Marshall

15 November 2022

RE: SUBMISSION ON PROPOSED PLAN CHANGE 3 TO THE HORIZONS ONE PLAN – URBAN DEVELOPMENT

1. Thank you for the opportunity to make this submission on Proposed Plan Change 3 (PC3) to the Horizons One Plan. Our submission relates to the whole plan change. Our submission points are detailed below, including decisions sought from the Horizons Regional Council (Horizons).
2. Horowhenua District Council (HDC) could not gain an advantage in trade competition through this submission.
3. HDC wishes to be heard in support of this submission. If others make a similar submission we would be willing to consider presenting a joint case to any hearing.

GENERAL SUBMISSION POINTS

4. HDC recognises that the Plan Change is required in order to give effect to the National Policy Statement on Urban Development 2020 (NPS-UD). We support the overall intention of the Plan Change and the need to bring the One Plan into alignment with the NPS-UD, subject to the amendments requested and points made below.
5. Horowhenua District Council is actively planning for growth, through the Growth Strategy 2040 (updated 2022), the Levin Structure Plan and the Horowhenua Blueprint. We are members of the Wellington Regional Growth Framework. We are undertaking Plan Changes to provide additional development capacity within our Rohe.
6. Horowhenua District Council is a Tier 3 local authority as it contains one Tier 3 urban environment (Levin). We note that of all of the settlements in the Horowhenua District, only Levin is defined in the plan change as an 'urban environment' and would therefore be subject to the provisions of Plan Change 3. We note that the Plan Change does not provide guidance on development of smaller settlements that do not meet the definition of Tier 1,2 or 3, or on which settlements may be escalated up a level over time as growth increases. Some guidance on such matters would be useful.

ESCALATION OF SUSTAINABLE URBAN GROWTH TO A KEYSTONE ENVIRONMENTAL ISSUE

7. Urban Growth and Development within the Horizons Rohe is happening at high rates across most, if not all of the District Council jurisdictions, as seen in the 2018 (latest available) census figures below –

Growth in Horizons Rohe 2013-2018	
Horowhenua District	2.0%
Manawatu District	1.9%
Whanganui District	1.5%
Rangitikei District	1.4%
Tararua District	1.3%
Palmerston North City	1.1%
Ruapehu District	0.8%

8. Given this, the complexity of issues around sustainable urban growth, and the direction from Central Government on this topic, we consider that well-functioning urban environments/sustainable growth should be escalated to be a keystone environmental issue – essentially setting out “The Big Five” instead of “The Big Four” in Chapter 1.3 of the One Plan.

Decision Sought:

That Plan Change 3 reporting includes an assessment of whether Sustainable Urban Growth should be included as a ‘keystone environmental issue’ in Chapter 1.3 of the One Plan.

DRAFTING TO MATCH NPS-UD WORDING/PROVIDE MORE REGIONAL-SPECIFIC DIRECTION

9. We note that the Plan Change essentially repeats the provisions of the NPS-UD, rather than seeking to provide a more tailored, regional direction. We consider that more regional direction in the plan change would be more efficient and effective means of achieving the purpose of the Resource Management Act (The Act). However, we recognise that the volume of national direction from central government has created an extensive amount work for the Regional Council , coupled with very short implementation timeframes, which has likely inhibited Horizon’s ability to provide more regional-specific direction.
10. We also note that the wording of PC3 departs slightly from NPS-UD in some places (e.g. re-ordering of provisions, or uses different words with similar meanings). This has the potential to cause confusion and may be seen to indicate that Horizons have different priorities when it comes to urban development than the guidance provided in the following examples
- PC3 **Policies UFD-03, UFD-04 and UFD-05** essentially rephrase Objectives 3, 5 and 8 respectively - of the NPS-UD with some wording/ordering changes.
 - PC3 **Policy P7(1)** appears to rephrase Policy 9 of the NPS-UD, but in using the term “planning decisions” it appears to miss the nuanced role iwi are able to play in plan preparation versus the

potential for a decision making role in resource consenting, designations, heritage orders and conservation orders, which is more clearly set out in NPS-UD Policy 9.

11. We request more regional direction on how to ensure urban development is resilient to the effects of climate change.

Decision Sought:

That if PC3 does not provide regional-specific direction and instead just repeats the NPS-UD, the PC3 provision wording should reflect the exact wording and word order of the NPS-UD unless there is a specific regional issue that is intended to be addressed. Where this relates to definitions in particular, we request that the definitions be limited to “as per the National Policy Statement – Urban Development 2020 or any subsequent amendment” or similar, so that the RPS will remain in step with the NPS-UD going forward.

CLARIFYING DRAFTING

12. We note that some of the Objectives and Policies in Plan Change 3 include lists of criteria. It would benefit Regional Plan users and provide more guidance for development if it were clarified whether all or one/some of the criteria are expected to be met.

e.g. PC3 **Policy UFD-P6** – Significant development capacity criteria – it should be clarified whether the matters listed under (1) are all expected to be met, or just some.

13. We also request that Objectives be clearer about the environmental outcome sought, particularly Objective 1 which, as currently drafted, details how strategic planning should be undertaken but is less clear about the outcome this strategic planning should achieve.

Decision Sought:

That where Plan Change 3 provisions include a list of criteria, it needs to be made clearer (though the use of and/or) whether all or some of the criteria need to be met in order for a proposal to be consistent with the provisions.

EMBODYING TERRITORIAL AUTHORITY FUNCTIONS IN THE RPS

14. We recognise that Regional Councils have expanded functions due to the 2017 amendment of the RMA, and note the wording of Section 30(ba):

“the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in relation to housing and business land to meet the expected demands of the region:”

15. However, we note that some of the provisions of PC3 appear to blur the lines between Regional Council and Territorial Authority functions, e.g. – providing for a range of housing types, heights and density of urban form, and urban form that “relates well to its surrounding environment”. We consider that these matters are best left to District and City Plans, as they are currently.

Decision sought:

Remove reference to residential density/amenity matters from the proposed provisions of PC3. If such provisions are to remain, we request clarification on what is meant by 'relates well to the surrounding environment'.

ESCALATION OF PUBLIC TRANSPORT AS A REQUIREMENT FOR GROWTH

16. Whilst we recognise the importance of public transport to well-functioning urban areas, from both a connectivity and climate change point of view, we have concern that the wording of provisions such as UFD-03 and **UFD-P4(1)(d) and (2)(c)** may have unintended for communities such as the Horowhenua District, which is currently under-serviced for public transport. Given that the provision of public transport (including the setting of and control over public transport routes) is a Regional Council, rather than Territorial Authority function, we would prefer to see wording that recognises that greenfields areas in particular should be designed to accommodate future public transport.

Decision sought:

- Amend references to/requirements for public transport services/corridors to recognise that public transport may not yet be available to all urban settlements, and require these services to instead be provided for, to ensure urban growth is more futureproof.
- Amend UFD-P4(4) to clarify that the provision of public transport is a Regional Council function – replace the term “provision of public transport” with “provide for existing and future public transport”.

INTENSIFICATION VS GREENFIELDS DEVELOPMENT

17. We support the neutral stance on intensification vs greenfields development in PC3, noting that in many territorial authorities it is likely that a combination of both will be needed in order to meet the expected demand for urban growth going forward. While intensification and redevelopment of urban areas provide opportunity for a more compact urban form, such developments are constrained by decision of the past (particularly in regard to environmental matters) and difficulty and cost of securing such land.
18. While Horowhenua District Council supports intensification, we acknowledge that greenfields development provides more opportunity to deliver development at the scale needed to meet demand and provides a 'clean slate' to deliver better environmental solutions, especially in respect of stormwater management and water sensitive design.
19. At present PC3 has just one policy, **UFD-P4**, covering both intensification and expansion. We consider that there should be separate policies for intensification and greenfields development, with clear, specific and separate (where appropriate) criteria for each matter, given that they entail different approaches to growth and deliver different environmental outcomes.

Decision sought:

- Provide separate policies for Intensification and Greenfields Development as part of PC3, but retain the neutral stance between the two.

- Provide more direction in these two policies to encourage more efficient utilisation of residential land, such as density targets or other methods and encourage water sensitive design

NATIONAL POLICY STATEMENT-HIGHLY PRODUCTIVE LAND (NPS-HPL)

20. As PC3 has been notified after the NPS-HPL was gazetted, this plan change presents an opportunity to bring the current One Plan provisions relating to the protection of versatile soils into line with the new requirements and ensure they remain fit for purpose. We recommend rewording provisions that refer to Class I and II soils to now refer to Class III also, and to change the references from “versatile soils” to “highly productive land”.

Decision sought:

- Rewording provisions that refer to Class I and II soils to now refer to Class III also, and to change the references from “versatile soils” to “highly productive land” as appropriate.

PROVISION OF INFRASTRUCTURE

21. One of the key barriers to urban growth/intensification is that the consenting process for upgrading/providing new water takes and water/wastewater/stormwater discharge and treatment, which is complex, long and costly for territorial authorities. As the regulator, the Horizons Regional Council through the One Plan influences consenting of major infrastructure projects required to service growth. We would like to see more guidance in Plan Change 3 around a clear and efficient pathway for consenting to provide certainty, whilst still recognising the need for environmental standards.

22. It is unclear what methods Territorial Authorities could use to implement **UFD-P1(2)** - particularly those that are not required to do a Future Development Strategy. The policy could provide more direction on how to implement this policy in planning processes (including use of non-plan methods).

23. We note also **UFD-P6(e) Significant Development Capacity** allows for “adequate existing or upgraded development infrastructure to support development” as a justification for allowing unanticipated or out of sequence development. It would be clearer to reword this clause to “adequate existing development infrastructure, or sufficient upgrades are able to be made to existing development infrastructure...”,

Decisions sought:

- Include more guidance in the PC3 provisions around a pathway for Regional Council consenting of community water, wastewater and stormwater infrastructure, with a view to minimising the cost of consenting whilst providing more certainty in the process and upholding appropriate environmental standards.
- Provide further direction/clarity on **UFD-P1(2)**, particularly for non-Tier 1 and 2 authorities, while being careful not to duplicate existing processes (such as Long Term Plan process). Reword **UFD-P6(e)** as requested above.

PAPAKĀINGA AND MARAE

24. Horowhenua District Council values its relationship with the iwi and hapū in our rohe. We support measures to establish and confirm a partnership approach with iwi in the wider Horizons rohe, and for this to be embedded in the Regional Policy Statement as a higher order planning document.
25. With regards to supporting the provision of papakāinga and marae, we note that the wording of **UFD-P7(2)(b)** – “enables papakāinga housing and marae on Māori owned land”, which we consider to be overly restrictive in that it does not provide for these land uses to establish on landholdings outside of Māori ownership.

Decision sought:

Remove the reference to Māori owned land in **UFD-P7(2)(b)**.

OTHER MATTERS

26. We see the Plan Change as being a great opportunity to provide some additional direction on key Regional Council matters that are raised in the plan change provisions, for example, but not limited to
- What is meant by “best practice resilience to the impacts of climate change” in **UFD-P8** – is it national direction, climate change adaptation or something else?
 - Some guidance on appropriate water-sensitive design for development
 - If amenity measures are to remain in the RPS, there should be some recognition that as settlements change and develop over time, so will the amenity of the area.
 - Some guidance on what is considered “well-designed” urban development means – **UFD-P8**.

Conclusion

We appreciate the opportunity to provide this submission on Proposed Plan Change 3 to the One Plan.

Yours Sincerely,



David McCorkindale

Group Manager Community Vision and Delivery

Horowhenua District Council

Robert Marshall

Subject: [Request ID :##84675##, Urban Development Plan Change 3 | Sharon Stevens] :
Added to group OnePlan

Full name: Sharon Stevens

Email: sharon@slowfarm.co.nz

Postal address: 25 Worcester St.Ashhurst 4810

Preferred contact number (daytime): +64 22 431 3364

I could gain an advantage in trade competition through this submission

No

I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition

No

The specific provisions of the proposal that my/our submission relates to are as follows (please list the provision)

Please see attachment.

My submission is that

Please see attachment.

I wish to be heard in support of my submission

No

If others make a similar submission I will consider presenting a joint case with them at a hearing

Yes,

4 November 2022

Tēnā koutou,

Thank you for the opportunity to submit on Plan Change 3 to the HRC One Plan, Urban Form and Development.

Submitter details

Name: Dr. Sharon Stevens
Email: sharon@slowfarm.co.nz
Postal address: 25 Worcester St., Ashhurst 4810
Preferred contact number: +64 22 431 3364

No trade advantage

To the best of my knowledge, I gain no trade, competition, or financial advantage through this submission.

Submitter background

I have no formal training or expertise in planning processes, and I am not current with all the relevant policy frameworks. My past academic research and my current and past work in community-based education and grassroots environmental action have seen me interacting at the margins of various planning processes for decades. Some of my past personal experience, research, and teaching has addressed collective housing arrangements (intentional communities, volunteer houses, co-housing, and eco-villages). My comments are non-technical and generally outcomes-oriented, offered in a spirit of ongoing dialogue and participatory democracy.

I speak only for myself, yet the insights of many others shape my submission. I especially wish to acknowledge participants in workshops on sustainable living environments that I have (co-)tutored and (co-)facilitated for the better part of a decade, primarily in the Palmerston North area, with participants generally attending from the lower North Island and especially the Palmerston North area. My comments are particularly reliant on those in my networks who are involved in alternative approaches to subdevelopment in the hope of better serving social justice and ecological outcomes.

UFD-P8, Urban Development and Climate Change

(1a) I support the plan's interest in compact housing and infill and also the preference for infill over greenfield development. I support the plan's inclusion of active and public transport. I ask for "active transport" to be amended to read as "safe active transport including protected cycleways."

(1b & 1c) I support the provisions for “water-based design and nature-based solutions” and consideration given to increases “in the scale and frequency of natural hazard events.” I ask for additional emphasis on green infrastructure for flood mitigation, a value that is in conflict (or at least in tension) with other aspects of the plan. In particular, many current infill practices significantly decrease permeable surfaces, providing additional strain on stormwater infrastructure, reducing groundwater retention, and contributing to the severity of floods.

To address the conflict between the value of compact cities and urban flood mitigation, I ask for stronger measures that limit impermeable surfaces.

Balancing compact housing with impermeable surfaces might be achieved by including inner-city housing that is designed for public and active transport only (limiting the need for driveways), provision for an increase in multi-level, multi-unit housing of limited height (e.g. 3 stories, human-scale) with green roofs, and working to revegetate green spaces in ways that improve water retention in the soil. I ask for planning provisions to promote tiny home development without the landscape fragmentation required by full subdivision, while also reducing barriers created by resource consents especially but not exclusively where tiny homes integrate provisions such as energy generation and composting toilets.

In particular, I ask that the One Plan actively promotes well-designed rain gardens inclusive of biodiversity (more like living wetlands with diverse plant, bird and insect populations, and less like open ponds favouring mosquitoes). I also ask that the One Plan requires urban expansions to take into account waterways, including ephemeral and historic waterways that have been degraded by catchment abuse. Ideally these will be revegetated and regenerated as part of the development process in ways that avoid channelisation.

(1b + 2b). The most direct approach for achieving energy efficiency and compact housing is by giving preference to smaller homes.

UFD-P5 Built forms

With regards to urban expansion or greenfield development, combined social and ecological outcomes may in many cases be improved by looking at collective or mini-neighbourhood purposes prior to subdividing. I point to the Quaker settlement in Whanganui as one practical example. I have also been in casual conversation with several very different social and eco-housing developers (private, business, and charitable) who all have found that their options are highly limited—at times prohibitively so—if subdivision has occurred without their input. The subdivision process locks in place many decisions about the size of homes and how homes and the land are connected to one another. Current practice often leads to uniformity at the subdivision level.

My direct experiences with collective living (overseas) and my interviews and reading in this area also show possibilities for connecting more people to the land and better serving ecosystem values by thinking at a scale larger than a single-family unit but smaller than a 20-minute neighbourhood.

A clustered collective of dwellings can increase population density while also leaving more room for water retention in the landscape and subdivision within collectively-owned* areas. In some cases resource sharing (e.g. shared laundry) is also practical among several households. If this were to become the norm it would significantly lower resource consumption.

** Collective living arrangements can be developed in ways that avoid the financial arrangements and entrapment associated with many retirement villages. As a rule of thumb, moving out of a planned community shouldn't feel like a messy and punishing divorce. Eco-villages and other collective housing arrangements will ideally plan from the beginning on how people will move away, for example, by developing financial plans that help people change their living arrangements in ways that respect their need for financial equity.*

Some additional thought is best given to how to promote separatist living arrangements such as communes, cults, survivalist outposts, and gated communities or other functionally elitist neighbourhoods. Highly diverse subdivisions can be designed so they have a character of their own while remaining connected to the wider neighbourhood—this requires thinking about diversity and social connection within planning units that are larger than a single dwelling and smaller than a 20-minute neighbourhood. See, for example, some of the subdivision designs of Greenbridge in Taranaki (no financial or other current relationship; past professional / co-instructional relationship). More diverse housing within a single subdivision, designed in ways that promote human interaction (instead of car-to-garage) could also ease the path to:

- integrated, multi-generational neighbourhoods (the return of the “street grandma or grandpa” supporting younger families and vice versa) and also to*
- neighbourhoods with diverse income earners who might then find synergies of interest, developing mutual understanding and support—or at the very least putting a known human face on the challenges of living well together.*

In relation to my own advocacy for collective living, I read with interest that, through iwi input, this plan change recognises the importance of marae as a form of urban development.

Other

I ask that food miles be considered part of urban emissions and addressed by:

- appropriate provisions for food gardens (inclusive of clean water, soil, and air) within 20-minute neighbourhoods and also by
- provision for the the development of larger-scale urban farms. By farm, I mean integrated, managed, biodiverse foodscapes that provide diverse employment opportunities and a variety of renewable resources—especially food from plants and animal—to feed local people and serve local markets.

Additional notes on the remedy I am requesting

Due to my lack of planning and policy expertise, this submission lacks some of the preferred specificity regarding provisions and remedies. I request that HRC staff engage with this submission generously, critically, and creatively, reducing barriers to informed but non-expert civic participation while giving practical effect to mandated consultation requirements. Thank you.

I do not wish to be heard in support of my submission.

Ngā mihi,

A handwritten signature in blue ink, appearing to read 'Sharon Stevens', with a stylized, flowing script.

Sharon Stevens

Submission 9

Robert Marshall

Subject: ##85555## : Urban Development Plan Change 3 | Marilyn and Bruce Bulloch
Attachments: Horizons Urban Development Plan Change - Submission 11-11-22.docx

Full name: Marilyn and Bruce Bulloch

Email: marilynbulloch@gmail.com

Postal address: 128 Cook Street West End Palmerston North 4410

Preferred contact number (daytime): 06 357 7338

I could gain an advantage in trade competition through this submission

No

I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition

Yes

The specific provisions of the proposal that my/our submission relates to are as follows (please list the provision)

The whole document.

My submission is that

Attached submission (1 page).

I wish to be heard in support of my submission

No

If others make a similar submission I will consider presenting a joint case with them at a hearing

Yes,

11 November 2022

Submission from
Marilyn and Bruce Bulloch
128 Cook Street
Palmerston North 4410

Phone 06 357 7338
Email: marilynbulloch@gmail.com

Horizons Urban Development Plan Change

Proposed Provisions for Public Notification October 2022

We support the scope and the intent of this Urban Development Plan Change (with some minor concerns). Our concerns are as follows:

First concern

Page 1. Under heading Scope and Background, third paragraph. This paragraph reads as follows:

***“Urban growth and rural residential subdivision* on versatile soils** Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto the more versatile soils may result in a reduction of options for their future productive use. This may adversely affect the ability of future generations to meet their reasonably foreseeable needs.”*

Currently development onto versatile soils is resulting in reduction of options for their future use. The word “may” implies a question of doubt and should be removed from this paragraph and be replaced by the present tense. We observe that the productive capacity of these soils is being reduced now. Our suggestion is to reword this paragraph is as follows:

***“Urban growth and rural residential subdivision* on versatile soils** Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto the more versatile soils ~~may~~ results in a reduction of options for their future productive use. This ~~may~~ will adversely affect the ability of future generations to meet their reasonably foreseeable needs.”*

Our second area of concern

Pages 8, 10, 17. The phrase “to enable Maori to express their cultural traditions and norms”.

We agree that Maori or any other cultural group should be able to undertake their cultural activities, but there needs to be limitations, especially in an urban area. Good planning rules should not be violated.

15 November 2022

Submission 10

Horizons Regional Council
Private Bag 11025
Manawatū Mail Centre
PALMERSTON NORTH 4442

Attn Robert Marshall

Dear Robert

Submission to Proposed Plan Change 3

1. Thank you for the opportunity to submit on Proposed Plan Change 3 (PPC3) to the Horizons One Plan. Our submission points are detailed below, along with decisions sought from the Horizons Regional Council (Horizons, HRC).
2. Manawatū District Council (MDC) could not gain an advantage in trade competition through this submission.
3. Manawatū wishes to be heard in support of this submission. If others make a similar submission we would be willing to consider presenting a joint case to any hearing.
4. Manawatū provided feedback on draft Plan Change 3 on 25 May 2022. A copy of this letter is attached to this submission for your information. In our feedback we expressed a willingness to participate in a workshop with other Territorial Authorities to have a regional conversation around urban development outcomes. We would welcome any opportunity to attend informal or formal prehearing meetings with Horizons and other parties to discuss these remaining matters.

The specific provisions of the proposal that my submission relates to:

The proposal as a whole:

1. National direction for urban environments is established through the National Policy Statement for Urban Development (NPS:UD). The NPS:UD also provides the opportunity to set direction reflecting the regional priorities and issues – i.e. how does the NPS:UD “land” in the Manawatū District. MDC is of the opinion that PPC3 has not capitalised on this opportunity.
2. MDC acknowledges that establishing a more tailored and regionally specific plan change would require additional resourcing and collaboration with the respective territorial authorities of the Manawatū-Whanganui Region. If Horizons is not in a position to deliver a regionally-specific plan change at this time, MDC looks forward to working with Horizons on these matters as we transition towards regional spatial planning under the new resource management framework.

3. It appears that Horizons approach to PPC3 attempts to replicate the NPS-UD but introduce differences in terminology and structure. These are not supported as they have the potential to create unnecessary implementation challenges. For those parts of PPC3 that essentially duplicate the higher order document, it would be MDC's preference that the wording be consistent.

Decision Sought:

- In the absence of establishing regionally specific provisions, care should be taken when RPS includes NPS:UD provisions & makes changes to these
- Amend wording match NPS:UD provisions, except where a clear regionally-specific approach is necessary.

Alignment with National Policy Statement: Highly Productive Land

4. MDC notes that the drafting of PPC3 was carried out prior to the National Policy Statement for Highly Productive Land (NPS-HPL) being finalised. The NPS-HPL is in effect and sets clear national direction around highly productive land outcomes.
5. We have some concerns that the directive nature of the NPS-HPL has the potential to create tension with PPC3. For example, our understanding is that PPC3 takes a neutral position between intensification and greenfield development, however this is inconsistent with the NPS-HPL which essentially only provides for greenfield development, on highly productive land, where all intensification options have been exhausted.
6. Likewise, existing Regional Policy Statement (RPS) direction is not consistent: UDF-02 requires territorial authorities to *"consider the benefits of retaining Class I and II versatile soils for use as production land when providing for urban growth and rural residential development."* Similarly, UFD-P3 requires territorial authorities to *"pay particular attention to the benefits of the retention of Class I and II versatile soils for use as production land in their assessment of how best to achieve sustainable management."*
7. While PPC3 makes no amendments to these provisions (other than numbering), the introduction of NPS-HPL cannot be set aside. The policy position of UFD-O2 has a material impact when considering the fit of PPC3 amendments relative to the overall package of RPS direction. While MDC acknowledges Horizons will be completing further work to give effect to NPS:HPL in the coming years, MDC recommends further analysis and amendments on this issue.

Decision Sought:

- The PPC3 includes evaluation of NPS:HPL and considers what amendments may be appropriate at this time, considering RPS Urban form and development as a package.

Clarification around greenfield growth vs intensification

8. MDC questions the approach of PPC3 to greenfield growth and intensification. While policy direction is included for both types of development, PPC3 does not sufficiently differentiate between these outcomes, as seen in UFD-P4 Urban Intensification and

Expansion. Greenfield and intensification present different challenges, including in relation to infrastructure provision, and regional direction on this would be helpful.

9. PPC3 does not appear to set a policy position around intensification versus greenfield growth, and no targets on this matter are stated. However, we recognise that the setting of targets is dependent on robust technical research and regionally collaboration, and is therefore premature. That said, Method 2 – point d) suggests that greenfield development is required due to a lack of infill capacity.
10. MDC seeks clarification around this point (and having regard to NPS:HPL as referenced above). Clarification is also relevant given that other RPS outcomes also potentially come into play (e.g. stormwater & water quality, biodiversity etc).
11. If, as per the proposal, Horizons is not going to differentiate then UFD-P4 needs to be split out as intensification and expansion require different policies.
12. UFD-P1 (2) refers to the timing of urban growth instead of urban development (growth and intensification).

Decision Sought:

- Clarification around policy direction & meaning of Method 2 – point d)
- Split UFD-P4 into a separate policy for intensification versus greenfield outcomes.
- To amend UFD-P1 (2) to refer to replace “urban growth” with “urban development.”

Roles and Responsibilities

13. Manawatū identifies a number of instances within PPC3 amendments that potentially create uncertainty relative to the roles and responsibilities as set-out in legislation. This includes the following:

- a. The delivery of infrastructure

MDC supports the inclusion of infrastructure as a key aspect of PPC3 – included in the objectives, policies and methods. That said, MDC considers matters relating to the funding and consenting of infrastructure could be further strengthened. For example Strategic Planning is identified as a key Method – however this does not refer infrastructure funding.

Likewise, the delivery of critical infrastructure requires working with Horizons – particularly around issues like stormwater and flood hazard mitigation. The infrastructure aspects of PPC3 do not sufficiently address these matters, and it would be appropriate for direct comment given the challenges and need for collaborative processes.

- b. Provision of public transport services

UFD-P4 (4) refers to “local authority transport plans and strategies.” As the provision of public transport services is a responsibility of the Regional Council, it is not clear how this requirement fits with the other requirements that must be implemented through district plan making. MDC seeks clarification as to whether this policy relates to Horizons responsibilities in relation to contributing to well-functioning urban environments. Policy guidance on how Regional Council and

territorial authorities can best work together to achieve a well-functioning public transport network would be beneficial.

c. Planning decisions

URD-P7(1) refers to ensuring “planning **decisions** involving urban environments...” enables hapū and iwi involvement, including in “decision making where appropriate...” While MDC supports iwi and hapū involvement in plan making, and there will scenarios where iwi and hapū are involved in resource consent processes, it is unclear how this involvement extends to RMA decision-making (i.e. consent decisions). The current wording of URD-P7(1) does not appear to align with the statutory processes in the Resource Management Act 1991.

d. Built Form

MDC is unclear around how UFD-P5 fits within the balance of PPC3, and queries whether the form and design of subdivision use and development at a scale is a necessary matter for inclusion within the RPS. The form and design of subdivision use and development in urban environments will be set by the respective district plans. It is unclear what UFD-P5 is contributing to this. Other policy in PPC3 already provides sufficient regional policy direction for urban development.

Decision sought:

- That Horizons amend UFD-P4 (4) to make it clear that the “local authority transport plans and strategies” referred to in this policy are the responsibility of Horizons.
- That URD-P7 is amended to ensure alignment with RMA statutory processes.
- That UDF-P5 is either deleted, or amended to reflect regional outcomes.
- That the methods section is update to reflect funding and consenting of infrastructure.

Providing for Papakāinga

14. MDC supports UFD-P7 (2)(b) that enables papakāinga housing and marae on Māori owned land. Through planning work that MDC has been undertaking, we have been made aware of the challenges facing hapū and whānau looking to establish papakāinga. One such challenge is that there is little Māori owned land within the Manawatū District. Care should be taken to not limit papakāinga housing options given this situation. As currently written, UFD-P7 is not clear around what Māori owned land refers to.

Decision Sought:

- That MDC seeks assurance that URD-P7 will not limit the ability for Māori to construct papakāinga housing on land that is not held in Māori title.

Application of RPS & Urban Environments

15. MDC is mindful that only Feilding meets the thresholds to be classified as an urban environment. Council is unclear as to the application of PPC3 to the other urban areas and how the proposed changes work as a package of regional policy directions.

16. This could become problematic if there are differing opinions as to the application of PPC3 where an urban village wishes to grow or intensify, and for the general strategic planning approach.

Decision Sought:

- That MDC seeks clarification as to how PPC3 applies to urban areas that are not classified as urban environments under the NPS-UD.

Minor edits

17. The heading of URD-P6 does not reflect the purpose of NPS-UD 2020 Policy 3.8(3). MDC recommends that this heading be amended to better reflect what is meant by this section.

18. The Issues and Objectives sections of PPC3 contain topic headings rather than resource management issues or objectives. It appears that the explanation below each 'heading' better reflects what it is that PPC3 is responding to. MDC recommends that the issues and objectives be amended. MDC would be happy to provide suggested wording if that would be helpful.

Decision Sought

- That the heading of URD-P6 be replaced with the following:

URD-P6 Criteria for evaluating unanticipated or out-of-sequence development

Ngā mihi nui

pp. 

Shayne Harris

CE – Manawatū District Council

Enc Copy of feedback to Horizons on the draft plan change (May 2022).

24 May 2022

Robert Marshall
Horizons Regional Council
Private Bag 11025, Manawatū Mail Centre
PALMERSTON NORTH 4442

Dear Robert

HORIZONS REGIONAL COUNCIL ONE PLAN – PREPARATION OF PLAN CHANGE 3 (URBAN DEVELOPMENT)

Thank you for providing a copy of draft Plan Change 3 (PC3) and seeking feedback on the Regional Council response to the National Policy Statement – Urban Development (NPS-UD) directions. Manawatū District Council (Council) welcomes the opportunity for a regional conversation around urban development outcomes.

Following the meeting on the 18 May 2022 we understand that Horizons is taking a neutral policy approach in PC3, i.e. there is no interest in setting directive or prescriptive regional policy for urban development at this time.

From a Council perspective we agree that setting prescriptive urban outcomes at this time is not supported. Such an approach requires appropriate evidentiary threshold and a thorough understanding of urban development across the region. Nevertheless, Council considers that PC3 provides an opportunity to fill a gap in the regional policy statement relating to urban development and provide a regional context. This could include

- identifying key regional issues associated with urban development
- weighing of competing issues – for example greenfield development vs protection of versatile soils
- linking of issues such as stormwater or flood hazard planning

Responding to these issues is important both in the current context and as we shift to regional spatial planning and plans prepared under the future Strategic Planning Act and Natural & Built Environment Act.

In terms of specific feedback on draft PC3:

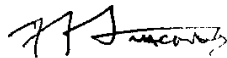
1. Council does not consider it necessary for PC3 to duplicate NPS-UD provisions as currently included. In addition, care should be taken when modifying NPS-UD provisions and Council suggests this should only occur where a specific regional outcome is sought. The concern here is the potential for creating inconsistency in higher-order documents & the impact of this at the Council plan change stage.
2. Council submits that draft PC3 does not adequately recognise the different facets of infrastructure provision that apply to urban development decisions. For example infrastructure planning, funding, delivery and lifecycle costs are all relevant matters for consideration.

3. Council is aware that both stormwater and flood hazard planning are core components of current urban development projects across the region. Council suggests that Horizons re-visit draft PC3 with this lens & review whether sufficient direction is included on this topic.
4. A final observation is that the draft PC3 edits change the balance of the RPS & that the topic of *urban growth and rural residential subdivision on versatile soils* is not as prominent. Council submits that care should be taken around how these two important issues are communicated in the RPS structure.

This letter provides technical staff feedback from the Manawatū District Council as opposed to an official position of the elected Council. Council is happy to provide further input, or to discuss further if you have any questions or wish to clarify this feedback

At the meeting on the 18 May 2022 there was discussion about the potential for a follow-up workshop with the TA's on this project. As previously indicated Council is happy to participate in any such workshop.

Ngā mihi nui



Matthew Mackay
Principal Policy Planner

Submission 11



pncc.govt.nz
info@pncc.govt.nz

Te Marae o Hine
The Square
Private Bag 11034
Palmerston North 4442
New Zealand

15/11/2022

Michael McCartney
Private Bag 11025
Manawatū Mail Centre
Palmerston North
4442

Dear Michael,

Submission on Proposed Plan Change 3 (Urban Development) Horizons Regional Council One Plan

Submitter: Waid Crockett, Chief Executive, Palmerston North City Council
Email: waid.crockett@pncc.govt.nz
Postal Address: Private Bag 11034, Palmerston North 4442
Phone number: (06)356 8199

I could gain an advantage in trade competition through this submission ~~(yes)~~ (no)

I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition. (yes) ~~(no)~~

Introduction

Thank you for the opportunity to submit on Proposed Plan Change 3 (Urban Development) (PC3). PC3 has direct implications on how Palmerston North City Council (PNCC) will plan for future urban growth. PNCC generally supports PC3; however, some changes to specific provisions are proposed to provide greater clarity or to amend a minor drafting error. Unless otherwise specifically stated, PNCC supports the PC3 as notified.

The specific provisions of the proposal that my submission relates to are as follows

UFD-O3 Urban form and function

UFD-O5 Urban development and climate change

UFD-P1 Integration of infrastructure with land use

UFD-P2 Providing sufficient development capacity

UFP-P8 Urban development and climate change

My submission is that

UFD-O3 Urban form and function

This objective is supported in-part. We request that UFD-O3(1)(c) be amended to exclude "that relates well to its surrounding environment", as shown in track changes below:

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 housing capacity and housing choice,

(c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment,~~

...

The reason for this request is that the NPS-UD assumes that urban environments will change over time. Needing to provide for development outcomes that relate well to the existing built environment has the potential to stymie opportunities for different development outcomes that the NPS-UD is seeking to enable; for example, medium-density development in locations where low-density housing currently prevails.

UFD-O5 Urban development and climate change

Further clarification about the intent of this objective is requested. Urban growth, by its nature, will result in increases in greenhouse gas emissions. If strictly interpreted, this objective could be difficult to give effect to. When read alongside **UFD-P8** it appears that reduction in greenhouse gas emissions is within the context of mitigation, through development that is energy efficient, water efficient, minimises waste, has access to public and active transport and utilises water sensitive design philosophy and nature-based solutions. This is not clear from the objective statement alone. It is requested that revision of this objective be made to create a clearer policy cascade, so that plan users can be clear whether the outcome intended is to reduce greenhouse gas emissions, or whether development should be managed in a way that reduces the relative potential for generating greenhouse gas emissions.

UFD-P1 Integration of infrastructure with land use

UFD-P1 aligns well with the expectations of the NPS-UD, but integration of infrastructure with land use should not be the sole responsibility of local territorial authorities. The Manawatu-Wanganui Regional Council (Horizons) is responsible for providing flood protection infrastructure. Where 1 in 200-year flood protection is not provided by Horizons to support urban development, urban development is not enabled. This undermines opportunities for territorial authorities to ensure that housing bottom lines can be met. This is problematic for locations like Ashhurst, where more affordable urban growth opportunities have been signalled since 2018, but flood protection upgrades have not been prioritised by Horizons to enable development there. If growth related infrastructure is not provided by Horizons, this could potentially become an impediment to rezoning and place at risk an opportunity for affordable housing opportunities to be provided. PNCC request that UFD-P1 be amended to recognise that Horizons also has a key role in aligning infrastructure provision with land use planning. PNCC notes that the development of a Future Development Strategy, in consultation with Horizons, also provides an opportunity to identify, fund and deliver flood protection improvements for Ashhurst and other urban growth opportunities.

UFD-P2 Providing sufficient development capacity

We request that the short-medium term figures be updated to 5,046 to align with PNCC's adopted housing bottom lines.

UFD-P4 Urban intensification and expansion

The same rationale for comments on UFD-O3 equally applies to UFD-P4(1)(b). We request that this policy be amended to exclude reference to "that relates well to its surrounding environment", as shown in track changes below:

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 provides for a range of residential areas that enable different housing types, site* size and densities ~~that relate well to the surrounding environment~~;

...

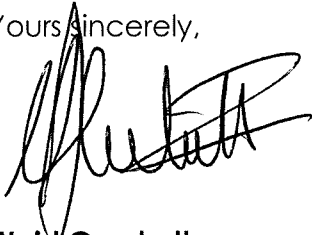
I seek the following decision from the Manawātū-Whanganui (Horizons) Regional Council

That PC3 be approved, subject to changes to UFD-O3, UFD-05, UFD-P1, UFD-P2 and UFD-P4 discussed above.

I wish to be heard in support of my submission **(yes)**~~(no)~~

If others make a similar submission I will consider presenting a joint case with them at a hearing **(yes)**~~(no)~~

Yours sincerely,



Wai Crockett
CHIEF EXECUTIVE

Palmerston North City Council

Dated: 15th day of November 2022



RANGITIKEI
DISTRICT COUNCIL

15 November 2022

Horizons Regional Council
Private Bag 11025
Manawatu Mail Centre
Palmerston North 4442

Submission 12

By email: submissions@horizons.govt.nz

Submission on Proposed Change 3 (Urban Development)

To: Horizons Regional Council

Name of Submitter: Rangitikei District Council

Address for Service: Rangitikei District Council
Private Bag 1102
Marton 4741
Attention: Katrina Gray
katrina.gray@rangitikei.govt.nz (preferred contact method)

Trade competition: Rangitikei District Council cannot gain an advantage in trade competition through this submission.

Hearing: Rangitikei District Council wishes to be heard in support of our submission.

If others make a similar submission, Rangitikei District Council will consider presenting a joint case with them at a hearing.

Rangitikei District Council welcomes any opportunity to attend informal or formal pre-hearing meetings with Horizons and other parties to discuss matters raised.

Introductory comments

Thank you for the opportunity to submit on Proposed Change 3 (Urban Development). Rangitikei District Council (Council) generally supports the intent of Proposed Change 3, and recognise the requirement for Horizons Regional Council (Horizons) to align the Regional Policy Statement (RPS) with the National Policy Statement on Urban Development (NPS-UD). Council offers a number of suggested amendments that are aimed at reducing duplication and increasing efficiency of implementation.

The Rangitikei District is not a tier 1 - 3 local authority as identified by the NPS-UD as we do not have a tier 1 – 3 urban environment within our District. However, the Rangitikei, particularly the southern Rangitikei, is growing, having experienced a district-wide growth rate of 1.3% per annum since 2014.

Making this place home.

Council is in the process of planning for future growth through the development of Pae Tawhiti Rangitīkei Beyond, the Rangitīkei Spatial Plan. Council supports the intent and importance of providing sufficient land for development and creating well-functioning communities.

Submission on the proposed provisions

Scope and Background

This section sets out background information which covers urban development and versatile soils. Reference to the NPS-UD has been incorporated. However, reference to the National Policy Statement for Highly Productive Land (NPS-HPL) is not included. Council recommends that this section is updated to reflect the NPS-HPL.

Urban environments are specifically identified as being Feilding, Palmerston North, Levin and Whanganui. However, there is no recognition of the large number of other towns and settlements throughout the region that are growing and form an important part of providing for overall regional growth. It is also important that these towns and settlements grow in a manner that creates well-functioning communities.

Decisions sought

- That the section “Urban growth and rural residential subdivision on versatile soils” be updated in its entirety to reflect and align with the NPS-HPL.
- That additional commentary is included that recognises the importance of the contribution to regional growth for towns and settlements that are growing, but are not defined as *urban environments*.

Issues

Three issues are set out which cover strategic planning, versatile soils and demand for housing, business land, infrastructure and community services. Council suggests further consideration is given to the drafting of the issues to:

- Reframe the drafting to ensure the issues identify the problem that is sought to be addressed.
- Look for opportunities to incorporate regional context into the explanatory part of the identified issues.
- Update UFD-I2 to reflect the NPS-HPL, and regional council responsibilities under this national direction.

Decisions sought

- Incorporate additional regional context and redrafting to focus on issue identification in UFD-I1 and UFD-I3.
- Remove or update UFD-I2 to reflect the NPS- HPL.

Objectives and Policies

Of the objectives and policies proposed, some apply to *urban environments* only, while others do not differentiate. Of the five proposed objectives, three apply only to *urban environments*, one applies generally, and one is related to versatile soils. Of the eight proposed policies, four apply only to *urban environments*, one applies generally, two in part to urban environments and generally and one is related to versatile soils.

As there are no current *urban environments* in the Rangitīkei, those proposed objectives and policies that relate to these environments will not directly apply. Regardless, when undertaking growth planning and plan changes the objectives and policies would act as a guide of 'best practice' for consideration, therefore, we provide comment on the whole section.

Council acknowledges that the proposed objectives and policies have been designed to align with the NPS-UD. Council particularly supports the acknowledgement that both expansion and intensification are anticipated. In regional communities, providing for the widest range of housing options is important for their growth and sustainability. Council also supports iwi and hapū involvement in planning for urban development. Council particularly supports the enabling of papakāinga developments. However, Council questions the ability of Councils to give effect to hapū and iwi involvement 'decision making' under the current local government system.

Council suggests a number of amendments below we consider would improve implementation of the RPS.

Decisions sought

- Remove all objectives and policies related to versatile land, or make amendments to ensure alignment with the NPS-HPL. The NPS-HPL now supersedes the provisions included in Proposed Change 3.
- Where a provision is duplicating, or slightly amending provisions from the NPS-UD, without a specific regional outcome in mind, that the provision is amended to cross reference the NPS-UD. Or alternatively the provision is amended to reflect/incorporate a specific regional outcome.
- Amend the wording of UFD-P1 to replace the word must, with a less stringent alternative (e.g. should consider the value in).
- Reconsider the drafting of all objectives and policies to remove references to matters that are largely the function of territorial authorities (e.g. UFD-P4(1)(d) and UFD-P4(1)(b)), and recognise that rural towns and settlements do not have access to reliable public transport.
- Split UFD-P4 into two policies, one focused on expansion and the other on intensification. This will support each policy being tailored to consider the appropriate matters for each approach, as these are quite different. Recognise that both expansion and intensification will be necessary in the Horizons context to meet regional growth aspirations.
- Reconsider the drafting of UFD-P7 to not restrict application to urban environments, recognise that papakāinga may not always be on Māori owned land and recognises wider economic development needs for business environments.

Methods

Council notes four methods have been proposed:

- Method 1 -Monitoring and Reporting
- Method 2 – Strategic Planning
- Method 3 – District Plans
- Method 4 – Advocacy

Council welcomes the opportunity to work collaboratively with Horizons on urban development and growth planning. Council considers the key roles Horizons plays in effective growth planning and the development of our communities is through the provision of natural hazard information, regional transport planning, and consenting of infrastructure projects.

The development and provision of natural hazard information is essential to managing risks associated with natural hazards and climate change in relation to urban growth. Investment in regional public transport also has a strong influence on the ability for communities to adopt public transport options. As the regulator, the One Plan strongly influences consenting of major infrastructure projects required to service growth such as for wastewater treatment and disposal.

Council suggests consideration is given to adding clarity on the responsibilities and the intentions of the Regional Council in each of the methods.

A number of the methods identify specific actions. The diversity of urban areas within the regional means there is likely to be a range of approaches to achieving urban development goals. Therefore, Council recommends the methods are refined to remove reference to specific actions e.g. removal of reference to structure plans in Method 2.

Method 2 identifies the importance of strategic planning in meeting the objectives and policies of the chapter. Council agrees with the importance of strategic planning in meeting urban growth needs. Council considers local input is essential in effective strategic planning, and will become even more important under a reformed Resource Management system. Method 2 identifies the Regional Public Transport Plan as important for achieving active transport and public transport. Council encourages Horizons to place importance on providing public transport options for the towns in the Rangitikei District, and note innovative public transport options will be needed to meet the needs of our communities.

Decisions sought

- That the roles and responsibilities of the Regional Council and territorial authorities are clarified in each method.
- That the Regional Council commits to the commissioning of natural hazard information required to ensure the effective planning our towns and settlements in the Rangitikei.
- That the methods are refined to remove reference to specific actions, as there is likely to be a diversity of approaches suitable across the region e.g. (removal of specific reference to structure planning which might not be the most suitable approach in all situations).
- That greater acknowledgement is given to the role Horizons plays in consenting infrastructure projects, and consideration is given to how the wider One Plan operates in relation to consenting infrastructure projects that support urban growth.

Principal Reasons

Three principal reasons are set out which align back to the identified issues. Once amendments are made to the issues, this section will also need to be updated.

UFD-PR2 related to versatile soils has not been updated. In light of the recent release of the NPS-HPL this section should be either removed or updated.

Decisions sought

- That the principal reasons are updated to align with changes made to the issues, or other amendments made to the wider provisions associated with this plan change.
- Remove or update UFD-PR2 to reflect/align with the NPS-HPL.

Anticipated Environmental Results

A series of anticipated environmental results are set out. Council recommends that these are reviewed once amendments are made to the wider provisions to ensure alignment.

Decisions sought

- That the anticipated environmental results are reviewed to ensure alignment with the wider chapter.

Definitions

Council notes that additional definitions are included that align with those in the NPS-UD. Council supports the adoption of the definitions from the NPS-UD but suggest only referencing the NPS-UD (rather than copying the wording) to future proof against possible updates to the definitions in the NPS-UD.

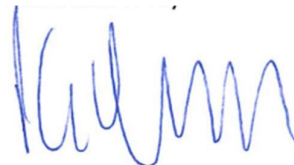
Concluding comments

Thank you for the opportunity to submit on Proposed Change 3 (Urban Development). Council welcomes the opportunity to work collaboratively with Horizons throughout the plan change process.

Naku noa,



Andy Watson
Mayor of the Rangitikei



Peter Beggs
Chief Executive

Submission on MWRC's Proposed Plan Change 3 - Urban Development

send to: submissions@horizons.govt.nz

due date: 15/11/2022

from: Dr Chris teo-Sherrell

1. I support the overall scope and the intent of Proposed Plan Change 3 but have the following comments and suggestions to make.
2. On p1 the statement (para 3) concerning the impact of urban expansion and lifestyle blocks on the potential future use of versatile soils is inadequate. The word 'may' is technically correct but does not reflect the reality that in the vast majority of cases such land use does reduce options for their future productive use.
3. Therefore, I propose the following wording instead as para 3

Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto the more versatile soils ~~may almost always results in a reduction of~~ reduces options for their future productive use. ~~This may~~ Such reduction in options adversely affects the ability of future generations to meet their reasonably foreseeable needs.”

4. Similarly, I propose that UFD-I2 on p2 should read

Urban growth and rural residential subdivision* (“lifestyle blocks”), on versatile soils ~~may almost always results~~ in those soils no longer being available for use as production land. These development pressures often occur on the fringes of some of the Region's urban areas, ~~most notably Palmerston North.~~

5. UFD-O2 on p4 is not strong enough in my view. Versatile soils, especially those close to urban areas are of immense value from a sustainability and resilience perspective. I request UFD-O2 to read

To ensure that Territorial Authorities* consider the benefits of retaining Class I and II¹ versatile soils² for use as production land* when providing for urban growth and rural residential subdivision* and give it a weighting in decision making that would only see it used for urban growth or rural residential purposes in the most exceptional of circumstances.

6. Similarly, I request that UFD-P3 on p6 read as follows

In providing for urban growth (including implementing Policy 3-4), and controlling rural residential subdivision* ("lifestyle blocks"), Territorial Authorities* must pay particular attention to the benefits of the retention of Class I and II versatile soils for use as production land^ in their assessment of how best to achieve sustainable management and give it a weighting in decision making that would only see it used for urban growth or rural residential purposes in the most exceptional of circumstances.

7. In UFD-P4 (2) on p7, I would also like to see the protection of versatile soils mandated. That is, I request that an additional point be added as follows:

(e) avoids using versatile soils except in the most exceptional of circumstances.

8. Future development should be putting public transport and active transport ahead of transport by motor car, whether internal combustion- or electrically-powered, to achieve liveability and sustainability objectives. Therefore, I request that UFD-P8, (2)(a) read

Territorial Authority* decisions and controls:

(a) on subdivision* and land* use must ensure that sustainable transport options such as public transport*, walking and cycling ~~can be~~ are integrated into land* use development, and

Thank you.

Sincerely

Chris Teo-Sherrell

37 Oxford St

Palmerston North 4410

carfreechris@inspire.net.nz (preferred method of communication)



Submission 14

FONTERRA LIMITED

SUBMISSION ON THE MANAWATŪ WHANGANUI REGIONAL COUNCIL'S (HORIZONS REGIONAL COUNCIL'S) PROPOSED PLAN CHANGE 3 TO THE HORIZONS ONE PLAN (REGIONAL POLICY STATEMENT)

To: Manawatū Whanganui Regional Council (Horizons Regional Council)

Submitter: **Fonterra Limited**

Contact: Suzanne O'Rourke
National Environmental Policy Manager, oCOO

Address for Service: Fonterra Limited
80 London Street,
Hamilton 3214
New Zealand

Mobile: + 64 27 288 0489

Email: Suzanne.orourke@fonterra.com

I confirm that I am authorised on behalf of Fonterra Limited to make this submission.

1. OVERVIEW OF COMMENTS

- 1.1. Fonterra Limited ("**Fonterra**") **generally supports** the Proposed Change 3 ("**PC3**") to the Manawatū Whanganui Regional Council's (Horizons) Regional Policy Statement (One Plan) ("**RPS**") subject to these amendments as detailed in this submission.
- 1.2. This submission contains the following sections:
 - Section 1:** Is this introduction
 - Section 2:** Provides background information on Fonterra's sites
 - Section 3:** Details the scope of the submission
 - Section 4:** Details the reasons for the submissions

- Section 5:** Outlines the decision sought by Fonterra
- Section 6:** Outlines the specific submission points
- Section 7:** Is a concluding statement
- Attachment A:** Fonterra's specific submissions points on PC3

2. BACKGROUND

- 2.1 Fonterra is a global leader in dairy nutrition and is the preferred supplier of dairy ingredients to many of the world's leading food companies. Fonterra is New Zealand's largest company, and a significant employer, with more than 11,000 New Zealand based staff and more than 6,500 employees based overseas.
- 2.2 The Manawātū Whanganui region makes a significant contribution to New Zealand's dairy industry, and Fonterra operates milk processing sites at Pahiatua and Longburn, as well as a world class research institute in Palmerston North. Fonterra is dedicated to ensuring that it undertakes its business in a sound and environmentally responsible manner, and is committed to encouraging its dairy farm suppliers towards better environmental performance.
- 2.3 The Longburn manufacturing site processes up to 2.5 million litres of milk per day, employs approximately 90 persons and is estimated to directly contribute approximately \$12.2 million annually to the local economy through wages, salaries and direct purchases. Adjacent to the Longburn site is Goodman Fielder's manufacturing site which employs approximately 210 persons and contributes approximately \$12 million annually to the local economy. The Fonterra Longburn manufacturing site provides wastewater services to process and treat wastewater from the Fonterra site as well as from the adjacent Goodman Fielder processing site.
- 2.4 Of relevance to PC3 is the current proposal to rezone the Braeburn Farm adjacent to the Longburn manufacturing site via the Palmerston North City Council's (PNCC) Kākātangiata Plan Change which is expected to be notified in early 2023. The Kākātangiata Plan Change will propose to rezone approximately 842 ha of land to the west of Palmerston North between the current urban area and Longburn.
- 2.5 Braeburn Farm is approximately 53 ha of land which is currently zoned Industrial with an overlay being the Braeburn Industrial Area overlay under the PNCC District Plan. This overlay was intended to provide for the Braeburn Farm to be used for the future expansion of the Fonterra Longburn manufacturing site.
- 2.6 The Braeburn Farm is no longer required by Fonterra for its future expansion or other purposes, and Fonterra will be seeking a change to the zoning via the Kākātangiata Plan Change process to uplift the Braeburn Industrial Area overlay and enable the area to be subdivided and developed in accordance with the underlying general Industrial Zone provisions.
- 2.7 Fonterra considers that this land is well suited for industrial development due to its already underlying zoning provision. Further, it is considered that it is not suitable for rezoning to residential land due to reverse sensitivity issues and potential adverse effects that may arise due to the noise and odour generated by the existing Longburn manufacturing site and the Fonterra wastewater treatment plant being located in close proximity to the boundary with the Braeburn Area.
- 2.8 Fonterra considers that the provision of appropriately zoned industrial land will support the urban development and well-functioning urban environment of Palmerston North City, as required under the NPSUD.

3. SCOPE OF SUBMISSION

- 3.1. This submission relates to all of PC3, and specifically
- Objective UFD-O3 and Policy UFD-P4 relating to urban form and function, and urban intensification and expansion
 - Policy UFD-8 relating to urban development in a way that reduces greenhouse gas emissions and improves for resilience to the effects of climate change
 - Objective UFD-O2 and Policy UFD-P3 relating to urban growth and rural residential subdivision on versatile soils.
- 3.2. For completeness, Fonterra supports, without amendment, the remaining provisions of PC3 that have not been detailed above.

4. REASONS FOR SUBMISSION

- 4.1. Fonterra generally supports the provisions of PC3 as it enables for the provision of sufficient development capacity to meet expected housing and business land and for well-functioning urban environments as directed by the NPSUD.
- 4.2. Fonterra notes that “business land” is defined in the NPSUD as including industrial land and supports PC3 including glossary definitions of this and other terms which are consistent with the NPSUD.
- 4.3. While Fonterra is generally supportive of PC3, Fonterra seeks amendments:
- a) to clarify that provision of sufficient development capacity explicitly includes provision of business land, and not just housing capacity;
 - b) to ensure that the design consideration of effects of development on climate change is appropriate; and
 - c) to achieve consistency between RPS objectives and policies regarding versatile soils with the National Policy Statement for Highly Productive Land 2022 (NPS-HPL).

5. DECISION SOUGHT

- 5.1. Retain PC3 as notified, subject to amendment as detailed in Attachment A.

6. SPECIFIC SUBMISSION POINTS

- 6.1. Fonterra’s specific submission points are provided in **Attachment A**.

7. OVERALL CONCLUSION

- 7.1. Fonterra supports Proposed Plan Change 3 to the Horizons Regional Council's One Plan, being proposed changes to the RPS subject to amendments as set out above, as it will:
- achieve the purpose of the Resource Management Act 1991;
 - enable the provision of sufficient housing and business land and well-functioning urban environments, and gives effect to the NPSUD;
 - enable the social and economic well-being of the community;
 - contribute towards the achievement of integrated management of the effects of use, development or protection of land and associated resources of the Horizons Region; and

- enable the efficient use and development of Fonterra's assets and operations, and of those resources.

Dated: 15 November 2022

Fonterra Limited

A handwritten signature in black ink, appearing to read 'Suzanne O'Rourke', written over a horizontal line.

Suzanne O'Rourke

ATTACHMENT A: FONTERRA LIMITED'S SUBMISSION ON PC3 TO THE HORIZONS REGIONAL COUNCIL'S ONE PLAN (REGIONAL POLICY STATEMENT)

Ref	Provision	Support / Oppose	Fonterra's Submission	Relief Sought
UFD-O3	RPS Objective Urban Form and Function	Support with amendment	<p>Proposed Objective UFD-O3 sets an objective for "urban form and function", in particular the intensification and expansion of urban environments. It is in two parts, with the first part relating to how intensification and expansion of urban environments contributes to the well-functioning of urban environments and the second part relating to where intensification and expansion should occur. While the second part of UFD-O3 specifically includes business land considerations, this is absent from part 1 of UFD-O3.</p> <p>Fonterra submits that the provision of sufficient development capacity of business land through intensification and expansion is a critical element of a well-functioning urban environment and is consistent with the provisions of the NPSUD. This is currently absent from UFD-O3. Fonterra's proposed amendments give effect to the NPSUD, which requires growth in choice and capacity of both housing and business land.</p>	<p>Amend UFD-O3(1) to read as follows:</p> <p><i>The intensification and expansion of urban environments:</i></p> <p>(1) <i>contributes to well-functioning urban environments that:</i></p> <ul style="list-style-type: none"> (a) <i>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,</i> (b) <i>increase <u>the capacity and choice available within housing and business land</u> capacity and housing choice,</i> (c) <i>achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,</i> (d) <i>are well connected by a choice of transport modes including public transport*, and</i> (e) <i>manage adverse environmental effects*.</i>
UFD-P4	RPS Policy on urban intensification and expansion	Support with amendment	<p>UFD-P4 which provides the policy direction for achievement of UFD-O3 is in two parts, with the first part directing District Plans to provide for and enable intensification and expansion of urban environments. However, as per our submission on UFD-O3, the first part of UFD-P4 also does not explicitly relate to business land.</p> <p>Fonterra submits that the provision of sufficient development capacity of business land through intensification and expansion is a critical element of a well-functioning urban environment and is consistent with the provisions of the NPSUD. This</p>	<p>Amend UFD-P4(1) to read as follows:</p> <p>(1) <i>Intensification and expansion of urban environments* is provided for and enabled in district plans^ where:</i></p> <ul style="list-style-type: none"> (a) <i>it contributes to a well-functioning urban environment*,</i> (b) <i>it provides for a range of residential areas that enable different housing types, site* size and densities that relate well to the surrounding environment,</i> <u>(bb) it provides for a range of business land that enable different business types, site* size and densities that relate well to the surrounding environment,</u>

Ref	Provision	Support / Oppose	Fonterra's Submission	Relief Sought
			is currently absent from UFD-P4. Fonterra's proposed amendments give effect to the NPSUD, which requires growth in choice and capacity of both housing and business land.	<p>(c) <i>higher density development is in close proximity to centre zones*, public transport*, community services*, employment opportunities, and open space,</i></p> <p>(d) <i>development is well serviced by existing or planned development infrastructure* and public transport*, and additional infrastructure* required to service the development capacity* is likely to be achieved, and</i></p> <p>(e) <i>it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.</i></p>
UFD-P8	RPS Policy re Urban development and climate change	Support with amendment	Proposed Policy UFD-P8 relates to urban development and climate change. Fonterra supports the intent of this policy and considers that it is appropriate that urban environments are developed in a way that reduces, as far as reasonably practicable, the effects of that development on climate change. However, Fonterra notes that there are many varied and complex drivers for urban land development design, and it is appropriate that effects on climate change are able to be taken into account alongside other drivers. For example, the directive in proposed policy UFD-P8(1)(a) requires design to minimise the contribution to climate change without necessarily due consideration of other design drivers.	<p>Amend UFD-P8(1) to read as follows:</p> <p>(1) <i>Urban environments* are developed in ways that reduce greenhouse gas[^] emissions and improve resilience to the effects* of climate change[^] by:</i></p> <p>(a) <i>use of urban design, building form and infrastructure[^] to minimise, as far as reasonably 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,</i></p> <p>(b) <i>urban development being compact, well designed and sustainable, and</i></p> <p>(c) <i>requiring best practice resilience to, the impacts of climate change[^], including sea level rise* and any increases in the scale and frequency of natural hazard* events.</i></p>
UFD-O2 & UFD-P3	RPS Objective & Policy on Versatile Soils	Support with amendment	PC3 includes existing objectives and policies from the RPS relating to the protection of versatile soils, specifically UFD-O2 and UFD-P3. This objective and policy were developed when the One Plan was first prepared and predate the NPS-HPL. They seek to ensure that the benefits of Class I and II versatile soils (as defined via the Land Use Classification system) are	<p>Amend UFD-O2 to read as follows:</p> <p><i>To ensure that Territorial Authorities consider the benefits of retaining <u>Highly Productive Land*</u> Class I and II versatile soils for use as production land when providing for urban growth and rural residential subdivision*.</i></p>

Ref	Provision	Support / Oppose	Fonterra's Submission	Relief Sought
			<p>considered when providing for urban growth and rural residential subdivision.</p> <p>Fonterra supports the protection of highly productive land, noting that its business relies on such land being available for dairy farming, as well as other primary production purposes. However, it considers that the existing objective and policy do not reflect the provisions which have since been introduced to national policy direction via the NPS-HPL and could potentially lead to conflict between the RPS and NPS-HPL.</p> <p>This is particularly the case with the proposed uplifting of the Braeburn Industrial Overlay from the Braeburn Farm. As noted above the underlying zoning of this property is Industrial in the PNCC District Plan. However, the land is undeveloped and current use of the land is rural, and the soils are classified as Class II under the Land Use Classification System.</p> <p>UFD-O2 and UFD-P3 would require the benefits of retaining this land in its current rural use to be considered and does not recognise the existing underlying zoning of Industrial. This is at odds with NPS-HPL definition of Highly Productive Land which, while linked to Class I and II soils, specifically excludes land already zoned for urban development as being considered highly productive land. This is as per clause 3.4(2) of the NPS-HPL which states that "land that, at the commencement date, is identified for future urban development must not be mapped as highly productive land".</p> <p>Fonterra therefore seek amendment to UFD-O2 and UFD-P3 to change references to versatile soils to be highly productive land as per the NPS-HPL. Changing this definition will also result in the inclusion of Class III versatile soils (rather</p>	<p>Amend UFD-P3 to read as follows:</p> <p><i>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 <u>Highly Productive Land Class I and II versatile soils</u> for use as production land^ in their assessment of how best to achieve sustainable management.</i></p> <p>Add the following to the glossary of PC3:</p> <p><u>Highly Productive Land</u> <i>has the same meaning as in the National Policy Statement for Highly Productive Land 2022</i></p>

Ref	Provision	Support / Oppose	Fonterra's Submission	Relief Sought
			than just Class I and II versatile soils), which is consistent with the NPS-HPL.	

Submission on Proposed Plan Change 3 (Urban Form & Development) - Horizons One Plan

To: Horizons Regional Council
Email: submissions@horizons.govt.nz

Submitter: New Zealand Defence Force
Contact Person: Lucy Edwards, Senior Statutory Planner

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PO Box 5271
Victoria Street West,
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Attention: Karen Baverstock

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- 1 The New Zealand Defence Force (NZDF) has military interests throughout New Zealand including in the Manawatu-Wanganui Region. This includes the Linton Military Camp located near Palmerston North, as well as the Raumai Weapons Range near Whanganui, RNZAF Base Ohakea and the Waiouru Military Camp and training area.
- 2 Palmerston North is an 'urban environment' as defined in the National Policy Statement on Urban Development (NPS-UD)¹. The nearby Linton Military Camp is the largest Army base in New Zealand and is extensively used for housing, training facilities including a rifle range, office accommodation and vehicle and equipment storage and maintenance. There are over 2,000 personnel based at the Linton Military Camp. As well as being essential for fulfilling NZDF's role under the Defence Act 1990, the Camp makes a significant contribution to the economic and social well-being of Palmerston North as well as the wider Manawātū-Whanganui Region.
- 3 Proposed Plan Change 3: Urban Development (PC3) sets out objectives and policies to give effect to the NPS-UD. Specifically it seeks to enable sufficient development capacity to meet expected demand, and for the planning of well-functioning urban environments. NZDF recognises the requirement to give effect to the NPS-UD and the need for development and the benefits that this can bring. It is not opposed to development and intensification provided that its interests, which include the ongoing operation of Defence facilities, are protected now and into the future.
- 4 NZDF, on behalf of the Minister of Defence, is highly conscious of:

¹ Whanganui, Levin and Fielding are also defined as urban environments.

- a. The role of defence facilities including the Linton Military Camp as strategic infrastructure and the recognition given to it under the Horizons One Plan Regional Policy Statement (RPS) as being '*a physical resource of regional or national importance*'.
 - b. The need to preserve the operational and training capabilities of the Military Camp so that it can be used to meet NZDF's obligations under section 5 of the Defence Act 1990.
 - c. The potential for development within Palmerston North to occur in proximity to the Linton Military Camp (PC3 UFD-13 recognises that development pressures often occur on the fringes of some of the Region's urban areas. A recent example of this being the Kākātangiata urban growth area located to the north of the Linton Military Camp).
- 5 Accordingly, the position of NZDF is that development must be appropriately located and designed in relation to established infrastructure, and needs to be managed in a way that avoids effects on regionally or nationally significant infrastructure.
 - 6 The existing provisions of the RPS appropriately provide for this approach. Specifically the provisions in Chapter 3: *Infrastructure, Energy, Waste, Hazardous Substances and Contaminated Land* including Objective 3.1 and Policies 3.1 and 3.2. However there is no connection between these existing RPS provisions and PC3. Considering the directive nature of the NPS-UD and associated PC3 provisions, there is the potential for these to be given primacy over other provisions within the RPS.
 - 7 This gap is acknowledged in the Section 32 Report, specifically in relation to the alternatives considered in Section 9 of this report² and the gap analysis contained in Appendix D. As noted in the Section 32, an integrated review of these matters, which includes infrastructure, with supporting evidence, is necessary to ensure a coherent response and to avoid inconsistency/conflict within the RPS. This more integrated approach was not supported given statutory and resource/capacity constraints, noting a more holistic review can occur when the RPS is reviewed as part of future works programmes.
 - 8 While acknowledging the constraints on a more fulsome review, NZDF notes there is no certainty regarding the scope or timing of a future review to ensure greater integration between existing and proposed RPS provisions. In the interim, further clarity is required on the relationship between PC3 and existing RPS provisions.
 - 9 NZDF therefore requests the changes set out below (or wording to similar effect). Proposed changes to PC3 are shown in green underlined text.

² Alternative 2 is to expand the scope of the PPC to address all environmental issues arising from urban development.

Issues

UFD-I3: Demand for housing, business land*, infrastructure^ and community services*

A growing population increases demand for housing, business land*, infrastructure^ and community services*. Growth needs to be provided for in a way that contributes to well-functioning urban environments*, is integrated with infrastructure^ planning and funding decisions, manages effects* on the urban and natural environment and on infrastructure and physical resources of regional or national importance, and improves resilience to the effects* of climate change^.

Objectives

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 housing capacity and housing choice,
 - (c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,
 - (d) are well connected by a choice of transport modes including public transport*, ~~and~~
 - (e) protects infrastructure and physical resources of regional or national importance and provides for its ongoing operation, and
 - (e) manage adverse environmental effects*.

Policies

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 provides for a range of residential areas that enable different housing types, site* size and densities that relate well to the surrounding environment,
- (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 public transport*, and additional infrastructure* required to service the development capacity* is likely to be achieved, and
- (e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.

(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,
- (d) manages adverse reverse sensitivity effects* on land with existing incompatible activities adjacent to the urban environment* boundary, and avoids adverse effects, including reverse sensitivity effects, on infrastructure and resources of regional or national importance.

NZDF **could not** gain an advantage in trade competition through this submission.

NZDF is directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition.

NZDF **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.



Person authorised to sign
on behalf of New Zealand Defence Force

Date 15/11/2022

Robert Marshall

Subject: ##85796## : Urban Development Plan Change 3 | Robert McLachlan

Full name: Robert McLachlan

Email: r.mclachlan@massey.ac.nz

Postal address: 1078 Tennent Drive, RD 2, Palmerston North 4472

Preferred contact number (daytime): 069517652

I could gain an advantage in trade competition through this submission

No

I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition

No

The specific provisions of the proposal that my/our submission relates to are as follows (please list the provision)

.

My submission is that

I support the move to urban intensification, more compact urban forms, prevention of urban sprawl, and reducing greenhouse gas emissions. Plans around these matters are some of the most important climate change decisions that New Zealand will make as they will lock in the direction of travel for decades to come. For its population, Palmerston North has a non-compact form and very, very little medium or high density development. It also has an entrenched car-based transport system that further sprawl would exacerbate, and, unlike some other NZ cities, has not set a target to reduce emissions or established a climate change plan. Greenfields development should only be allowed in tiny quantities and only then when we have shown that we are able to set in motion steadily decreasing greenhouse gas emissions.

I wish to be heard in support of my submission

No

If others make a similar submission I will consider presenting a joint case with them at a hearing

No



15 November 2022

Attn: Horizons Regional Council
Private Bag 11025
Manawatū Mail Centre
Palmerston North 4442

Feedback provided via email: submissions@horizons.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
PROPOSAL FOR PROPOSED CHANGE 3 TO THE HORIZONS REGIONAL COUNCIL –
ONE PLAN UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT
ACT 1991**

This is a submission on Proposed Change 3 (“PC3”) on the Regional Policy Statement – One Plan for the Horizons Region (“the Plan” or “RPS”) from Horizons Regional Council (“the Council” or “GWRC”):

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to:

PC3 in its entirety.

This document and the appendices attached is Kāinga Ora submission on PC3.

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Waipā district.
3. Kāinga Ora therefore has an interest in Horizon Regional Council’s PC3 and how it:
 - (a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - (b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - (c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned Kāinga Ora housing developments.
4. The Kāinga Ora submission is supportive of the approach taken within PC3 in relation to the following topic areas:
 - (a) Incorporates the National Policy Statement on Urban Development 2020 (NPS-UD) requirements to provide for growth in the region, but most importantly, promoting compact and concentrated urban form and densification in the region;
 - (b) Promotes for well-functioning and quality urban environments, based around transit-oriented development and connected centres, and a centre’s hierarchy; and

5. Kāinga Ora is generally supportive of the direction of integrating land use and transport planning in PC3, as this will help to discourage private vehicle dependency, and encourage multi modal transport and use of public/active transport for a means of travel, which is consistent with the direction of the NPS-UD. This will not only have a positive impact on the form, design, and function of the Horizons region, but will also contribute to the region's emission targets.
6. However, Kāinga Ora seeks that consideration is made for equality of access to public transport, across the region where demand for public transport will likely increase or be required (i.e., new network connections) due to the anticipated residential growth and development that will occur across the region.
7. Kāinga Ora generally supports the changes to policies that allow for more intensification in Palmerston North but also seeks that consideration is also given to growth in Levin, which has similar growth predictions (to support the Wellington Regional Growth Strategy). Kāinga Ora seeks that Regional Council also prioritise urban growth in Levin as an urban environment and work with Horowhenua District Council to ensure Levin is serviced by centre zones, employment, public transport and business land is planned.
8. The changes requested are made to:
 - (a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - (b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - (c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - (d) Provide clarity for all plan users; and
 - (e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
9. The Kāinga Ora submission points and changes sought can be in **Attachment 1** – Table 1, which identifies the specific submission points and amendments to PC3 that Kāinga Ora either supports, opposes or seeks amendment to;

Kāinga Ora seeks the following decision from Horizons Regional Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in **Attachment 1** shown in red and are struck through or bold red underlined, or as otherwise described are accepted and adopted into PC3, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora does not wish to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on PC3 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a dotted line.

Brendon Liggett
Manager – Development Planning
Kāinga Ora – Homes and Communities

ADDRESS FOR SERVICE: Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1051. Email: developmentplanning@kaingaora.govt.nz

Attachment 1: Amendments sought to Proposed Change 3

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<i>Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.</i>					
Insert Section Heading					
1.		<i>All of PC3</i>		The Kāinga Ora submission relates to PC3 in its entirety. Where proposed amendments to the operative RPS are not included in this submission table those provisions are supported in part, subject to the relief sought by Kāinga Ora in its primary submission. Kāinga Ora wants to acknowledge the projected growth in the Horowhenua, specifically within Levin. The Horowhenua District Council's own Growth Strategy 2040 has predicted there will be a need for an additional 11,209 households and 26,008 additional people by 2040. This is in line with the bottom line projections for Palmerston North over the next 20 years within this RPS (UFD-P2). Kāinga Ora seeks that Regional Council also prioritise urban growth in Levin as an urban environment and work with both Horowhenua District Council and Kāinga Ora to ensure Levin is serviced by centre zones, employment, public transport and business land is planned.	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
2.	UFD-O5 Urban development and climate change	Urban environments* are resilient to the effects* of climate change^ and support reductions in greenhouse gas^ emissions	Support in part	Kāinga Ora supports this policy but seeks further expansion to make the objective clearer and directive.	<u>Regional and district plans contribute to the region being</u> Urban environments* resilient to the effects* of climate change^ and support reductions in greenhouse gas^ emissions, <u>and where climate change mitigation is an integral part of well-functioning urban environments* and rural areas.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
3	UFD-P2 Providing sufficient development capacity*	<p><i>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:</i></p> <p><i>(3) ensuring the urban intensification and expansion necessary to meet the housing bottom lines* specified in Table X 3 is provided for in the Palmerston North District Plan.</i></p>	Support in part	<p>Horowhenua District Council have projected that an additional 11,209 homes are required in Levin by 2040, as a key housing provider in the region Kāinga Ora seek that Levin is included in the housing bottom line table under UFD-P2. Although Horowhenua District Council is a Tier 3 Council under the NPS-UD, the projected growth in Levin (to support the Wellington Regional Growth Framework) is more akin to a Tier 1 or 2 Council. The policy should therefore be amended to include Horowhenua District Council within the RPS to align urban intensification and expansion expectations for the district.</p>	<p><i>(3) ensuring the urban intensification and expansion necessary to meet the housing bottom lines* specified in Table X is provided for in the Palmerston North District Plan <u>and the Horowhenua District Plan.</u></i></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
4	UFD-P4: Urban intensification	<p>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it:</p> <p>(d) manages adverse reverse sensitivity effects* on land with existing incompatible activities adjacent to the urban environment* boundary.</p>	Support in part	<p>Kāinga Ora supports this policy but seeks that Regional Council specify which land and activities this policy pertains to. In this instance, rural land should be protected from reverse sensitivity effects, as the Horizon's Region has a lot of valuable productive land. Unplanned out of sequence growth and rural lifestyle living has led to the fragmentation of rural land through subdivision. In some areas there are reverse sensitivity concerns from new dwellers, resulting in associated adverse effects on the productive capacity of the land and its versatility, as well as on the efficient operation and growth of rural production activities. Many of these rural lifestyle lots</p>	<p>(d) manages adverse reverse sensitivity effects* <u>from out of sequence development on land with existing incompatible activities adjacent to the urban environment* boundary rural or open space land valued for its productive, ecological, aesthetic and recreational qualities.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
				are in areas that have poor infrastructure and should be protected from out of sequence growth unless.	
5.	UFD-P4: Urban intensification and expansion	<p><i>(1) Intensification and expansion of urban environments* is provided for and enabled in district plans^ where:</i></p> <p><i>(d) development is well serviced by existing or planned development infrastructure* and public transport*, and additional infrastructure* required to service the development</i></p>	Support in part	Kāinga Ora supports this policy but seeks additional wording to be included to require the incorporation of equality in accessible transportation options that provide public transport options for all. This is important as demand for public transport will likely increase or be required (i.e., new network connections) due to the anticipated residential growth and development that will occur across the region.	<p><i>UFD-P4: Urban intensification and expansion.</i></p> <p><i>1. d) development is well serviced by existing or planned development infrastructure* and <u>equitable</u> public transport*, and additional infrastructure* required to service the</i></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
		capacity* is likely to be achieved, and			development capacity* is likely to be achieved, and
6.	UFD-P4: Urban intensification and expansion	<p>(1) Intensification and expansion of urban environments* is provided for and enabled in district plans^ where:</p> <p>(d) development is well serviced by existing or planned development infrastructure* and public transport*, and additional infrastructure* required to</p>	Support in part	<p>Kāinga Ora supports this policy but seeks additional wording to be included to align with the wording within the NPS-UD. In this instance, “well serviced” infrastructure leaves a level of ambiguity which could constrain future urban development. Under ‘Interpretations’ the NPS-UD defines development capacity as:</p> <p>development capacity means the capacity of land to be developed for housing or for business use, based on:</p>	<p>UFD-P4: Urban intensification and expansion.</p> <p><u>(1)</u> Intensification and expansion of urban environments* is provided for and enabled in district plans^ where:</p> <p>(d) development is well <u>adequately</u> serviced by existing or planned development infrastructure* and public transport*, and additional infrastructure* required to service</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
		<i>service the development capacity* is likely to be achieved.</i>		<p><i>(b) and the provision of <u>adequate</u> development infrastructure</i></p> <p>Kāinga Ora seeks that the wording is updated to align with the NPS-UD and to provide more clarity on the level of service required for infrastructure to support increased urban density.</p>	<i>the development capacity* is likely to be achieved.</i>
7.	<i>UFD-P5: Built forms</i>	<i>The form and design of subdivision, use and development in urban environments* is managed so that it:</i>	Support in part	Kāinga Ora support the inclusion of a policy or policies focusing on marae and papakāinga and consider there is room for improvement across all regulatory plans within the Horizons Region. Kāinga Ora seeks additional wording to enable papakāinga development in urban areas, reduce any ambiguity for	<p><i>The form and design of subdivision, use and development in urban environments* is managed so that it:</i></p> <p><u>(4) Promotes papakāinga in urban settings by providing plan enabled urban papakāinga, including on general title land.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
				those district/city plan provisions and recognise that the diverse need for housing typologies and layouts. This will also enable Māori to develop their existing land, where new land is not available or existing housing and infrastructure needs to be upgraded or redeveloped.	
8.	UFD-P8 Urban development and climate change	(1) <i>Urban environments* are developed in ways that reduce greenhouse gas[^] emissions and improve resilience to the effects* of climate change[^] by:</i>	Support in part	Kāinga Ora supports the goal of developing urban environments in ways that reduce greenhouse gas emissions and improve resilience to the effects of climate change. However, Kāinga Ora considers that this policy needs to refer to a definition for “best practice resilience” and a definition of best	<i>(c) requiring best practice resilience[*] to, the impacts of climate change[^], including sea level rise* and any increases in the scale and frequency of natural hazard* events.</i>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Proposed changes are shown as striketrough for deletion and <u>underlined</u> for proposed additional text.</p>
		<p><i>(c) requiring best practice resilience to, the impacts of climate change[^], including sea level rise* and any increases in the scale and frequency of natural hazard* events.</i></p>		<p>practice is introduced as this term is currently ambiguous.</p>	<p>Definitions to be added to One Plan as below:</p> <p><u><i>Best practice resilience - has the same meaning as in the Glossary of terms in Appendix 1 of the National Adaption Plan 2022 (as set out below):</i></u></p> <p><u><i>means the capacity of interconnected social, economic and ecological systems to cope with a hazardous event, trend or disturbance, by responding or reorganising in ways that maintain their essential function,</i></u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
					<u>identity and structure. Resilience is a positive attribute when it allows systems to maintain their capacity to adapt, learn and/or transform.</u>
9.	Method 1 Monitoring and reporting	Description: The Regional Council, together with Territorial Authorities*, must meet the evidence-based decision-making requirements of Subpart 3 of the NPS UD, in relation to urban environments*. This includes a requirement for the Regional Council and Palmerston North City Council to jointly prepare and publish Housing and	Support in part	Kāinga Ora recognises the proposed growth in Levin and seeks that Regional Council prioritise urban growth in Levin, as an urban environment and work with both Horowhenua District Council and Kāinga Ora to ensure Levin is serviced by employment, public transport and business land is planned. To support this, the RPS should be amended to require that a Housing and Business Development Capacity Assessments	Description: This includes a requirement for the Regional Council, and Palmerston North City Council <u>and Horowhenua District Council</u> to jointly prepare and publish Housing and Business Development Capacity Assessments* and Future Development Strategies*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought <i>Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.</i>
		<i>Business Development Capacity Assessments* and Future Development Strategies*</i>		and Future Development Strategies be prepared for Levin.	
10.	Method 2 Strategic planning	<i>Description: The aim of this method is to undertake strategic planning to meet the objectives and policies of this Chapter. The Regional Council, together with Palmerston North City Council, will determine housing development capacity* that is feasible* and likely to be taken up in short term*, medium term*, and long term* through Housing and Business</i>	Support in part	Following on from submission Point 9, Kāinga Ora seeks that the RPS should be amended to require that a Housing and Business Development Capacity Assessments and Future Development Strategies are prepared for Levin.	<i>Description: The aim of this method is to undertake strategic planning to meet the objectives and policies of this Chapter. The Regional Council, together with the Palmerston North City Council <u>and Horowhenua District Council</u>, will determine housing development capacity* that is feasible* and likely to be taken up in short term*, medium term*, and long term* through Housing and Business Development Capacity Assessments*.</i>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					Proposed changes are shown as strikethrough for deletion and <u>underlined</u> for proposed additional text.
		Development Capacity Assessments*. In addition, the Regional Council and Palmerston North City Council will jointly prepare Future Development Strategies*:			In addition, the Regional Council and Palmerston North City Council <u>and Horowhenua District Council</u> will jointly prepare Future Development Strategies*.
11.	Method 4 Advocacy	Description: Where appropriate, the Regional Council will advocate the objectives and policies in this chapter to external agencies that contribute to shaping urban form and development, such as Kāinga Ora.	Support in part	Kāinga Ora recognises Horizon Regional Council's willingness to advocate on the organisations behalf. However, meaningful advocacy also require consultation and partnership, Kāinga Ora request that Method 4 is amended to reflect this and look forward to working closely with Council.	Description: Where appropriate, the Regional Council will <u>consult on and</u> advocate the objectives and policies in this chapter to external agencies that contribute to shaping urban form and development, such as Kāinga Ora.

Robert Marshall

Subject:

##85954## : Urban Development Plan Change 3 | Philip John Lake

Full name: Philip John Lake

Email: philip.lake@actrix.co.nz

Postal address: 104 Union Street Foxton 4814

Preferred contact number (daytime): 027 67 000 27

I could gain an advantage in trade competition through this submission

No

I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition

Yes

The specific provisions of the proposal that my/our submission relates to are as follows (please list the provision)

Objective UFD-O3 (1) (d) and (2) (b) Policy UFD-P4 (1) (c) and (d), (3) (b), and (4) Policy UFD-P8 (1)

(a) Method 2 - Strategic Planning Method 4 - Advocacy

My submission is that

With all due respect and without meaning to be disrespectful or frivolous, I find it quite farcical that there are a number of provisions related to development linked to public transport when there is barely any public transport in this Region - it is almost entirely focussed in Whanganui and Palmerston North. I trust that Horizons Regional Council will put serious effort into expanding the coverage and frequency of public transport across the Region to implement all of these proposed One Plan provisions. Horizons should also be collaborating with neighbouring Regional Councils and lobbying government for funding and assistance to implement public transport services. The Regional Transport Plan has consistently ignored developing the use of the existing rail system for passenger use (or even expanded freight frequency). It has been a struggle to improve the Capital Connection and obtain inter-regional funding and government assistance with this. It is inconsistent and disadvantageous that Palmerston North has only ONE daily return train journey to Wellington while the Wairarapa have seven daily. If it can work for the Wairarapa, why not 7 daily services for the Manawatu/Horowhenua? It has also been sad to see the Northern Explorer train service drop so many stops from its itinerary and reduce the frequency of trains (before COVID). I think it would help its viability if there were several short trains daily in both directions, stopping at every station that passengers want to use (have booked) and could travel faster (8 hours instead of 12). Longer sections of duplicate railway lines will resolve bottlenecks and allow more trains (passenger and freight) to travel both ways more often. In addition, the railway lines could be used to run at least rail cars between towns across the region (south Taranaki to Whanganui, between Hamilton and Taumarunui/Ohakune, Taihape to Whanganui and/or Palmerston North, Waipawa/Napier to Palmerston North and Masterton to Palmerston North. Both ways in all cases, and several times daily to make them flexible and attractive/practical for passengers. Weekends as well as weekdays. Bus services between towns also need to be implemented (or instead of rail, at least until rail can be sorted out) in a similar manner but obviously to towns that are not on railway lines as a priority. There needs to be buses frequently in the mornings and evenings to reflect people's normal commuting times and routes. Within towns there need to be frequent minibuses to help people get to and from their local shops without using cars. It would be helpful to have late night transport for Fridays, Saturdays and local late night shopping hours too - for customers and retail workers. Bicycles are not practical for grocery or appliance/furniture shopping. Bicycles are only suitable for families of children within age ranges of reasonable capability, road sense, and endurance. While I support cycle trails, there is very limited benefit in those trails being between towns when they are more than 15 km apart, as very few people will want to cycle that far and the costs for so few cyclists are enormously inefficient. It is much better to ensure that

roads and highways have sufficiently wide shoulders for cyclists on these routes instead. Is it possible to include specific details of some of these proposals into One Plan Policies and Objectives so that the Regional Transport Plan and District Plans can be more directly required to take concrete steps to build up public transport services and make urban development more likely to sustain viable public transport patronage? I think subdivisions would naturally intensify development along the public transport routes but there may be an opportunity to require a bus stop or two for greenfield developments. I realise much of the above is outside the One Plan's scope (and even outside the RMA) but hope that key aspects of my submission can be used to insert much stronger links between public transport planning and the One Plan (and Spatial Plans, District Plans and subdivision consents).

I wish to be heard in support of my submission

No

If others make a similar submission I will consider presenting a joint case with them at a hearing

No

Submission on Public Notice of Proposed Plan Change under Clause 5 of the First Schedule of the Resource Management Act 1991

To: Manawatū – Whanganui (Horizons) Regional Council:

This is a submission by: National Public Health | MidCentral, Te Whatu Ora | Health New Zealand.

Proposed Plan Change 3 to the Manawatū-Whanganui One Plan – Urban Development:

1. The National Public Health Service, forms part of Te Whatu Ora | Health New Zealand, an entity established under s 11 of the Pae Ora (Healthy Futures) Act 2022, and “representing a relevant aspect of the public interest” pursuant to Schedule 1 s.8(1) (a) of the Resource Management Act 1991. It has statutory obligations for public health under the Pae Ora (Healthy Futures) Act 2022, the Health Act 1956 and various other pieces of legislation.
2. The National Public Health Service is required to promote health and prevent, reduce, and delay ill-health, including by collaborating with other agencies, organisations, and individuals to address the determinants of health. The notified planning process includes matters with the potential to impact on the health of people and communities.
3. The specific parts of Proposed Plan Change 3 to the Manawatū-Whanganui One Plan – Urban Development to which this submission relates are shown in the attached schedule including whether we support, oppose or are neutral regarding specific parts or wish to have them amended.
4. We will wish to be heard in support of this Submission at any hearing but are not prepared to consider presenting a joint case with other submitters. If clarification or facilitating resolution of any matter related to a proposed policy statement of a plan is initiated pursuant to Schedule 1, s. 8AA of the Act, we request to be consulted or invited.

Dated 17 November 2022

**Paula Snowden,
Regional Director, Central Region,
National Public Health Service**



Signed:

Address for service: National Public Health Service | MidCentral Private Bag 11036 PALMERSTON NORTH 4442

Attention: Dr Robert Holdaway **Email:** PublicHealthops@midcentraldhb.govt.nz

Phone: 06-3509110

SCHEDULE OF SUBMISSIONS BY

Public Health Services, Te Pae Hauora o Ruahine o Taranaki | MidCentral

1. Submission ¹

Submission relates to this specific part of proposal	<p>UFD-O2: Urban growth and rural residential subdivision* on versatile soils</p> <p>To ensure that Territorial Authorities* consider the benefits of retaining Class I and II¹ versatile soils² for use as production land* when providing for urban growth and rural residential subdivision*.</p>
<p>Regarding this part, we wish amendment to this part.</p> <p>For the following reasons. We think that the phrase ‘consider the benefits of retaining class I and II soils’ needs a stronger word than consider.</p>	
<p>The recommendation/decision sought is amend this provision as follows:</p> <p>To ensure that Territorial Authorities give due consideration to the benefits of retaining class I and II soils.</p>	

2. Submission ²

Submission relates to this specific part of proposal	<p>UFD-O3: Urban form and function</p> <p>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 housing capacity and housing choice,(c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,(d) are well connected by a choice of transport modes including public transport*, and(e) manage adverse environmental effects*.(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, or(b) it is well-served by existing or planned public transport*, or(c) there is a high demand for housing or business land*, relative to other areas within that urban environment*</p>
<p>Regarding this part, we wish amendment to this part.</p> <p>For the following reasons. We wish to include active transport under section UFD-O3 (2)(b). Active transport is accessible and well connected by a choice of transport modes including walking, cycling and public transport.</p>	
<p>The recommendation/decision sought is amend this provision as follows: Under UFD-O3 (2)(b) add the suggested words “and includes options that encourage active transport”.</p>	

3. Submission ^{3 & 4}

Submission relates to this specific part of proposal	<p>UFD-P2: Providing sufficient development capacity*</p> <p>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</p>
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	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(3) ensuring the urban intensification and expansion necessary to meet the housing bottom lines* specified in Table X3 is provided for in the Palmerston North District Plan
<p>Regarding this part, we wish amendment to this part.</p> <p>For the following reasons. 1. Part of Urban Intensification relates to the loss of green spaces such as the traditional back yard. To compensate for this it is essential that communal green spaces are provided. These are essential for not only physical health but also spiritual and mental health/well-being. This aligns with the Māori health model Te Whare Tapa Whā, the four dimensions of Māori well-being.</p> <p>2. We note that housing bottom lines are included for Tier 2 local authorities such as Palmerston North City Council. We support a similar approach for tier 3 local authorities as per Clause 1.5 of the NPS Urban Development. Lack of housing is an issue in a number of our smaller towns. We would like to see Palmerston North City Council offer support to surrounding district councils in this regard.</p> <p>The recommendation/decision sought is amend this provision as follows:</p> <p>1. It is essential that communal green spaces are included any urban intensification planning.</p> <p>2. With regard to housing bottom lines, a similar approach is suggested for tier 3 local authorities.</p>	

4. Submission ⁵

Submission relates to this specific part of proposal	<p>UFD-P3: Urban growth and rural residential subdivision* on versatile soils</p> <p>In providing for urban growth (including implementing Policy 3-4), and controlling rural residential subdivision* ("lifestyle blocks"), Territorial Authorities* must pay particular attention to the benefits of the retention of Class I and II versatile soils for use as production land^ in their assessment of how best to achieve sustainable management.</p>
<p>Regarding this part, we are neutral.</p> <p>For the following reasons. Note is made of the recently developed National Policy Statement for Highly Productive Land 2022 (NPS-HPL), that has been published since the public notification of PC-3. It is further noted that Regional Councils are required to notify in a proposed regional policy statement, by way of maps, all of the land that is required by clause 3.4 of the NPS-HPL to be mapped as highly productive land. Therefore we suggest that this and other relevant parts of the Urban Development Plan Change (PC3) are cross-referenced to the NPS-HPL 2022.</p> <p>The recommendation/decision sought is amend this provision as follows: Cross reference this policy to the NES-HPL.</p>	

5. Submission ⁶⁻⁹

Submission relates to this specific part of proposal	<p>UFD-P4: Urban intensification and expansion</p> <p>(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 provides for a range of residential areas that enable different housing types, site* size and densities that relate well to the surrounding environment,(c) higher density development is in close proximity to centre zones*, public transport*, community services*, employment opportunities, and open space,(d)</p>
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	<p>development is well serviced by existing or planned development infrastructure* and public transport*, and additional infrastructure* required to service the development capacity* is likely to be achieved, and(e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.</p> <p>(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, (d) manages adverse reverse sensitivity effects* on land with existing incompatible activities adjacent to the urban environment* boundary.</p> <p>(3) District plans^ applying to urban environments* must enable heights and density of urban form which are equal to the greater of:(a) demonstrated demand for housing and/or business use, or (b) the level of accessibility provided by existing or planned* active transport* or public transport* to areas with community services* and employment opportunities.</p> <p>(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*.</p>
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Regarding this part, we wish amendment to this part.

For the following reasons.

1. We wish to minimise potential risks to health from intensification. Under point (1), alongside intensification, consideration is given to potential adverse public health impacts from residential developments on busy roads: these impacts include noise pollution and health risk from air pollution (eg from vehicles, see HAPINZ 3.0).
2. We would suggest a minor wording change to sub clause (4) by way of enabling and encouraging active transport.
3. We would encourage Horizons Regional Council and Palmerston North City Council to support other Territorial Authorities in the region to undertake Housing and Business Development Capacity Assessments* and Future Development Strategies*. The reason being that the other Territorial Authorities are less likely to have the resources required to undertake these assessments on their own.
4. We suggest that equity is considered in the way that urban intensification is done. The distribution of benefits and risks of urban intensification and expansion needs to be fair among different population groups.

The recommendation/decision sought is amend this provision as follows:

1. Under subclause (1) add a new subclause (1)(f) consideration is given to the risk to public health from intensification
2. Under sub clause (4) include the words 'and encouraging'.
3. We would encourage Horizons Regional Council and Palmerston North City Council to support other Territorial Authorities in the region to undertake Housing and Business Development Capacity Assessments* and Future Development Strategies*
4. Add a fifth subclause to UFD-4 as follow: (5) The intensification and expansion of urban environments is done in a just and equitable manner

6. Submission ¹⁰

Submission relates to this specific part of proposal	<p>UFD-P8: Urban development and climate change^</p> <p>(1) Urban environments* are developed in ways that reduce greenhouse</p>
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	<p>gas[^] emissions and improve resilience to the effects* of climate change[^] by:(a) use of urban design, building form and infrastructure[^] to minimise 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(c) requiring best practice resilience to, the impacts of climate change[^], including sea level rise* and any increases in the scale and frequency of natural hazard* events (2)</p> <p>Territorial Authority* decisions and controls:(a) on subdivision* and land* use must ensure that sustainable transport options such as public transport*, walking and cycling can be 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</p>
<p>Regarding this part, we wish amendment to this part.</p> <p>For the following reasons. The Public Health Service considers that in times of drought, earthquake or climate change emergencies, consideration is given to emergency water supplies. Communities will be more resilient and sustainable if there are provisions made for emergency water supplies. An example of this could be storm water tanks connected to urban houses. There is potential for storm water to be used for activities such as garden watering. In times of emergency or climate change event, storm water could be used for toilet flushing, as well as drinking water after some basic water treatment such boiling or treatment with chlorine bleach.</p>	
<p>The recommendation/decision sought is amend this provision as follows: That this policy UFD-P8: Urban development and climate change[^] be re-worded to include a statement regarding emergency water supplies.</p>	

7. Submission ¹¹

Submission relates to this specific part of proposal	<p>Definitions to be added to One Plan</p> <p>Development infrastructure has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below): means the following, to the extent that they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002):(a) network infrastructure for water* supply, wastewater, or stormwater (b) land transport (as defined in section 5 of the Land Transport Management Act 2003).</p>
<p>Regarding this part, we wish amendment to this part.</p> <p>For the following reasons. We consider that this definition should be future proofed to take into account developments in the Three Waters space involving control of water infrastructure, which may no longer sit with Councils.</p>	
<p>The recommendation/decision sought is amend this provision as follows:</p> <p>Is the proposed plan change future proofed for any developments occurring through Three Waters.</p>	