



# **Summary of Submissions and Decisions Requested**

## **Proposed Plan Change 3**

February 2023

## ***Introduction***

This document is a summary of the decisions and changes requested in each submission received on the Proposed Plan Change 3 (PPC3) to the Manawatū-Whanganui Regional Council (Horizons) One Plan. The purpose of this summary is to provide you with an overview of the decisions sought by submitters on PPC3, making it easier to identify whether you would like to make a further submission (if you are eligible to do so).

We strongly advise you to read the whole submission if you are considering making a further submission. All submissions are available on Horizons' website.

## ***Further submissions***

Further submissions are an opportunity to support or oppose decisions sought by submitters, and give your reasons. The further submission process is prescribed by the Resource Management Act 1991 (RMA). It enables the following people to make a further submission:

- Any person representing a relevant area of the public interest
- Any person who has an interest in the proposed plan change greater than the interest the general public has
- The local authority itself (i.e., Horizons).

In a further submission you are limited to a matter in support or opposition to the original submission; you cannot introduce a new topic through a further submission.

You must make your submission before **5pm on Tuesday 28 February 2023** using the form prescribed through the RMA ([Form 6](#)). An electronic version of this form is available via Horizons' website, [www.horizons.govt.nz](http://www.horizons.govt.nz). You can make a written or electronic further submission to Horizons in any of the following ways:

- Use the online submission form, available at [www.horizons.govt.nz](http://www.horizons.govt.nz);
- Deliver your submission to the Horizons offices at 11-15 Victoria Avenue, Palmerston North;
- Email your submission to [submissions@horizons.govt.nz](mailto:submissions@horizons.govt.nz); or
- Post your submission to Private Bag 11025 Manawatū Mail Centre, Palmerston North 4442.

**IMPORTANT:** A copy of your further submission must be sent to the person who made the original submission within 5 working days of making your further submission to the Regional Council. This can be via email; submitters' email addresses, where given, are listed below.

## ***Summary of submissions vs original submissions***

It is recommended that you use this summary to identify any submissions and submission points you may wish to comment on and then access the original – all submissions are available on Horizons' website.

- This document includes limited information copied from the original submission. Many submissions include a great deal more background information and detailed reasons or context for their requests.
- Some submitters do not set out an explicit request for a change or decision in their submission; when this happens, officers have made their best effort to infer what the submitter is requesting.

- Where submitters have requested changes to planning provisions using track changes, the requested wording will be clearer in the original submission.

### ***Some other things to note***

Please note that all further submissions are public. They will be published in full on the Horizons website and in documents that are available to the public, following the close of the further submission period. This is because plan change processes carried out under the Resource Management Act 1991 are public processes. Your further submission will only be used for the purpose of the plan change or variation process.

One submission was received after 5pm on November 15 2022. The time period was waived on behalf of Council under delegated authority, and this submission has been incorporated into the Summary of Submissions.

### ***Original Submitters by Submitter Number (including email address where given)***

1	Transpower New Zealand Limited	<a href="mailto:environment.policy@transpower.co.nz">environment.policy@transpower.co.nz</a>
2	Waka Kotahi	<a href="mailto:EnvironmentalPlanning@nzta.govt.nz">EnvironmentalPlanning@nzta.govt.nz</a>
3	Ministry of Education	<a href="mailto:Zach.chisam@beca.com">Zach.chisam@beca.com</a>
4	KiwiRail	
5	Wellington Fish and Game Council	<a href="mailto:acoughlan@fishandgame.org.nz">acoughlan@fishandgame.org.nz</a>
6	Summerset Group Holdings Ltd	<a href="mailto:hannah@incite.co.nz">hannah@incite.co.nz</a>
7	Horowhenua District Council	<a href="mailto:StrategicPlanning@horowhenua.govt.nz">StrategicPlanning@horowhenua.govt.nz</a>
8	Dr Sharon Stevens	<a href="mailto:sharon@slowfarm.co.nz">sharon@slowfarm.co.nz</a>
9	Marilyn & Bruce Bulloch	<a href="mailto:marilynbulloch@gmail.com">marilynbulloch@gmail.com</a>
10	Manawatū District Council	
11	Palmerston North City Council	<a href="mailto:waid.crockett@pncc.govt.nz">waid.crockett@pncc.govt.nz</a>
12	Rangitikei District Council	<a href="mailto:katrina.gray@rangitikei.govt.nz">katrina.gray@rangitikei.govt.nz</a>
13	Dr Chris Teo-Sherrel	<a href="mailto:carfreechris@inspire.net.nz">carfreechris@inspire.net.nz</a>
14	Fonterra Ltd	<a href="mailto:Suzanne.orourke@fonterra.com">Suzanne.orourke@fonterra.com</a>
15	New Zealand Defence Force	<a href="mailto:lucy.edwards@nzdf.mil.nz">lucy.edwards@nzdf.mil.nz</a> <a href="mailto:kbaverstock@tonkintaylor.co.nz">kbaverstock@tonkintaylor.co.nz</a>
16	Robert McLachlan	<a href="mailto:r.mclachlan@massey.ac.nz">r.mclachlan@massey.ac.nz</a>
17	Kāinga Ora Homes and Communities	<a href="mailto:developmentplanning@kaingaora.govt.nz">developmentplanning@kaingaora.govt.nz</a>
18	Philip John Lake	<a href="mailto:Philip.lake@actrix.co.nz">Philip.lake@actrix.co.nz</a>
19	National Public Health: MidCentral, Te Whatu Ora, Health New Zealand.	<a href="mailto:PublicHealthops@midcentraldhb.govt.nz">PublicHealthops@midcentraldhb.govt.nz</a>

Sub No.	Submitter Name	Specific Plan Provision	Support/ Oppose	Reasons	Decision/Action Requested
1	Transpower New Zealand Limited	UFD-O3	Amend	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).	Amend to include: <i>(f) manages the effects on nationally significant infrastructure.</i>
		UFD-P4	Amend	Transpower supports the intent of the policy but seeks amendment to provide consideration of the effects of intensification and expansion on the National Grid.	Amend UFD-P4(1) to include: <i>(f) the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised.</i>  Amend UFD-P4(2) to include: <i>(e) ensures the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised.</i>
		UFD-P6	Amend	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.	Amend UFD-P6(1)(f) as follows: <i>(f) the development avoids adverse effects* on infrastructure^ and other physical resources of regional or national importance as far as reasonably practicable.</i>  <b>Or</b> <i>(f) the development avoids adverse effects* on infrastructure^ and other physical resources of regional or national importance as far as reasonably practicable.</i>
		Definitions	Amend	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 NPSUD.	Include the NPS UD definition of “nationally significant infrastructure”.
2	Waka Kotahi	UFD-I1	Support	Waka Kotahi supports this issue as it recognises the essential link between integrated land use and infrastructure planning and achieving a well-functioning environment.	Retain as notified.
		UFD-I3	Support		Retain as notified.
		UFD-O1	Support	Waka Kotahi supports this objective as it requires integrated land use and infrastructure planning and implements the NPS UD.	Retain as notified.

Sub No.	Submitter Name	Specific Plan Provision	Support/ Oppose	Reasons	Decision/Action Requested
		UFD-O3	Support	Waka Kotahi supports this objective as it recognises the importance of a well-functioning urban environment as defined under the NPS UD.	Retain as notified.
		UFD-O5	Support	Waka Kotahi supports this issue as it implements the NPS UD.	Retain as notified.
		UFD-P1	Support	Waka Kotahi supports this issue as it recognises the importance of integrating transport investment decisions with land use planning and implements the NPS UD.	Retain as notified.
		UFD-P2	Support	Waka Kotahi supports the provision of sufficient development capacity in accordance NPS UD.	Retain as notified.
		UFD-P4	Support with amendments	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.	Support with amendments: <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> <i>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: ....</i> <i>(c) is well-connected <u>by a variety of transport modes and</u> <del>along</del> transport corridors,</i> <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 <del>by enabling</del> <u>active transport* infrastructure.</u></i>
		UFD-P5	Support	Waka Kotahi supports this issue as it implements the NPS UD.	Retain as notified.
		UFD-P6	Support with amendments	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	Support with amendments: <i>(1) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: ....</i>



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				considering unanticipated or out of sequence development.	<i>(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>
		UFD-P7	Support	Waka Kotahi supports Iwi and Hapū being involved in planning processes and a partnership approach to achieving Treaty of Waitangi principles.	Retain as notified.
		UFD-P8	Support	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 NPS UD.	Retain as notified.
		Methods	Support	Waka Kotahi supports the methods to implement the policies in this chapter as they align with the requirements of the NPS UD.	Retain as notified.
3	Ministry of Education	UFD-I1	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.
		UFD-O1	Support	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.	Retain as proposed.
		UFD-P4	Support	The Ministry supports the proposed inclusion of UFD-P4 to ensure that the development capacity of urban environments is maximised and coordinated.	Retain as proposed.
		Definitions	Support	The Ministry is supportive of the proposed inclusion of a definition for additional infrastructure, which includes schools, as defined under the NPS-UD.	Retain as proposed.

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4	KiwiRail	UFD-I1	Amend	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.	Amend to: <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...</i>
		UFD-I3	Amend	KiwiRail considers express recognition of reverse sensitivity effects is necessary to ensure development near transport corridors can co-exist in an appropriate way.	Amend to: <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 <del>planning and funding decisions</del>, 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-O1	Amend	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.	Add clause: <i>(5) land use conflicts are minimised as far as practicable, including avoiding the potential for reverse sensitivity effects.</i>
		UFD-O3	Support	KiwiRail supports Objective 03 to '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'.	Retain as proposed
		UFD-O5	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-P1	Amend	KiwiRail considers express recognition of reverse sensitivity effects is necessary to ensure development	Add clause:

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				near transport corridors can co-exist in an appropriate way.	<i>3) ensure development avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.</i>
		UFD-P2	Amend	KiwiRail 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 clause: <i>(4) The development avoids the potential for reverse sensitivity effects on the safe and efficient operation of infrastructure, including transport corridors.</i>
		UFD-P4	Amend	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.  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.	Amend to: (e) 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.  d) manages adverse reverse sensitivity effects on land with existing incompatible activities <del>or adjacent to the urban environment* boundary</del>
		UFD-P6	Support	KiwiRail supports the intent of Policy 6 and supports clause (f).	Retain as proposed
		UFD-P8	Support	KiwiRail supports UFD P8.	Retain as proposed
		Definitions	Support	KiwiRail supports the 'additional infrastructure' definition.	Retain as proposed
		Definitions	Support	KiwiRail supports the "well-functioning urban environments" definition.	Retain as proposed
5	Wellington Fish and Game Council (WFGC)	UFD-I3	Support with amendments	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.	Amend to: 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, <b>and leads to improvements in</b> the urban



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					and natural environment <b><i>including freshwater</i></b> , and improves resilience to the effects of climate change.
		UFD-O1 (2)	Support with amendments	To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions.	Amend to: New development, development infrastructure and additional infrastructure are provided in a coordinated, integrated, and efficient manner <b><i>which maintains or improves the natural environment including freshwater and increases resilience to climate change.</i></b>
		UFD-O3 (1)	Support with amendments		Amend to: (e) manage adverse environmental effects <b><i>so impacted environments are improved and enhanced.</i></b>
		UFD-P1 (2)	Support with amendments		Amend to: Ensure there is coordination between the location, form, and timing of urban growth and the funding, delivery, and implementation of development structure <b><i>which helps improve the natural environment.</i></b>
		UDF-P8 (1)	Support with amendments	<p>Urban development in a sustainable future 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>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. Urban design cannot be developed at the expense of freshwater ecosystems.</p>	<p>Amend to: Urban environments are developed in ways that reduce greenhouse gas emissions, improve resilience to the effects of climate change, and <b><i>reduce stress on and lead to improvements in freshwater ecosystems and the natural environment.</i></b></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, <b><i>while giving effect to Te Mana o te Wai.</i></b></p>

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		Method 2 (b)	Support	Development infrastructure to include three waters infrastructure which reduces negative impacts on the receiving freshwater environment.	Retain.
		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.	Retain.
		UFD-PR3	Support	This phrase helps integrate urban development with the natural environment, and should be integrated throughout the RPS UFD: <i>“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.”</i>	This phrase should be emphasised throughout the Proposed Plan Change 3.
		UFD-AER4	Support with amendments	To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions.	Amend to: Development infrastructure is in place in time to facilitate urban intensification or expansion <b><u>with no adverse environmental impacts caused, and remediation to existing damage where possible, including to freshwater quality and quantity.</u></b>
6	Summerset Group Holdings Limited	UFD-O1	Support	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.	Retain
		UFD-O3 (1)	Support	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.	Retain
		UFD-O3 (2)	Amend	The objective provides for the expansion of urban environments, however this is not reflected in clause 2, which refers only to “areas of an urban environment”, which are presumably existing.	Amend: <i>(2) enable more people to live in, and more businesses and community services* to be located in, areas of an urban</i>

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				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 Summerset that flexibility is provided to expand beyond the existing urban environment, where appropriate.	<i>environment* <u>or through the expansion of an urban environment</u> where:</i>
		UFD-P2	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>It is important to Summerset that flexibility is provided to expand beyond the existing urban environment, where appropriate.</p>	Delete reference to “in urban environments” as follows: <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* <del>in urban environments*</del> by:</i>
		UFD-P4	Support	Summerset 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	Amend	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.	Amend: <i>(b) the development is, <u>or will be</u>, well-connected along existing or anticipated transport corridors, and to existing or anticipated community services*, and existing or anticipated open space</i>
7	Horowhenua District Council	General	Clarification sought	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.

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		General	Amend	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.	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.
		General	Amend	<p>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.</p> <p>We note that the wording of PC3 departs slightly from NPS-UD in some places. This has the potential to cause confusion and may be seen to indicate that Horizons have different priorities when it comes to urban development.</p>	<p>We request more regional direction on how to ensure urban development is resilient to the effects of climate change.</p> <p>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.</p> <p>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.</p>
		Objectives & Policies	Clarification sought	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.	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.
		General Provisions	Amend	We note that some of the provisions of PC3 appear to blur the lines between Regional Council and Territorial Authority functions. We consider that these matters are best left to District and City Plans, as they are currently.	Remove reference to residential density/amenity matters from the proposed provisions of PC3.
		UFD-03 UFD-P4	Amend	We have concern that the wording of provisions such as UFD-03 and <b>UFD-P4(1)(d) and (2)(c)</b> may have unintended for communities such as the Horowhenua	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

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				District. We would prefer to see wording that recognises that greenfields areas in particular should be designed to accommodate future public transport.	these services to instead be provided for, to ensure urban growth is more futureproof.  Clarify that the provision of public transport is a Regional Council function.
		UFD-P4	Support with amendments	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.	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.
		General	Amend	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.	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.
		UFD-P1(2) UFD-P6	Clarification sought	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.  It is unclear what methods Territorial Authorities could use to implement <b>UFD-P1(2)</b> .  It would be clearer to reword UFD-P6(e) to "adequate existing development infrastructure, or sufficient upgrades are able to be made to existing development infrastructure..."	Include more guidance in the PC3 provisions around a pathway for Regional Council consenting of community water, wastewater and stormwater infrastructure.  Provide further direction/clarity on <b>UFD-P1(2)</b> .  Reword <b>UFD-P6(e)</b> as requested.
		UFD-P7(2)(b)	Amend	We consider the wording of <b>UFD-P7(2)(b)</b> to be overly restrictive in that it does not provide for these land uses	Remove the reference to Māori owned land in <b>UFD-P7(2)(b)</b> .

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				to establish on landholdings outside of Māori ownership.	
8	Dr. Sharon Stevens	UFD-P5	Neutral	<p>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.</p> <p>Possibilities exist 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.</p>	Promotion of collective living arrangements in the plan change - specifically in relation to UFD-P5.
		UFD-P8	Support with amendments	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 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."	<p>I ask for:</p> <ul style="list-style-type: none"> <li>• "active transport" to be amended to read as "safe active transport including protected cycleways."</li> <li>• 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.</li> <li>• stronger measures that limit impermeable surfaces.</li> <li>• planning provisions to promote tiny home development without the landscape fragmentation required by full subdivision.</li> <li>• that the One Plan actively promotes well-designed rain gardens inclusive of biodiversity</li> <li>• that the One Plan requires urban expansions to take into account waterways, including ephemeral and historic waterways that have been degraded by catchment abuse.</li> </ul>
		Whole PC3	Amend	<p>I ask that food miles be considered part of urban emissions and be addressed by:</p> <ul style="list-style-type: none"> <li>• appropriate provisions for food gardens within 20 minute neighbourhoods and also by</li> <li>• provision for the development of larger-scale urban farms.</li> </ul>	



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9	Marilyn & Bruce Bulloch	Scope and Background	Support in part/ Amend	Currently development onto versatile soils is resulting in reduction of options for their future use. The word “may” (third paragraph) implies a question of doubt.	Reword to: <i>Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto the more versatile soils <del>may</del> results in a reduction of options for their future productive use. This <del>may</del> will adversely affect the ability of future generations to meet their reasonably foreseeable needs.”</i>
		UFD-P7, Method 2, Definitions	Not stated (concern raised)	In regards to 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.	-
10	Manawatu District Council	Whole PC3	Oppose	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.	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.
		Whole PC3	Amend	Drafting of the PPC3 was carried out prior to the National Policy Statement for Highly Productive Land (NPS-HPL) being finalised. We have some concerns that the directive nature of the NPS-HPL has the potential to create tension with PPC3.	The PPC3 includes elevation of NPS-HPL and considers what amendments may be appropriate at this time, considering RPS Urban form and development as a package.
		UFD-P1(2) UFD-P4 Method 2	Amend	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.	Clarification around policy direction and meaning of Method 2- point (d).  Split UFD-P4 into separate policy direction for intensification versus greenfield outcomes.  To amend UFD-P1 (2) to refer to replace “urban growth” with “Urban development.”

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		UFD-P4(4) UFD-P7 UFD-P5 Methods	Amend	Manawatū identifies a number of instances within PPC3 that potentially creates uncertainty relative to the roles and responsibilities as set-out in legislation.	That: <ul style="list-style-type: none"> <li>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.</li> <li>UFD-P7 is amended to ensure alignment with RMA statutory processes.</li> <li>UFD-P5 is either deleted, or amended to reflect regional outcomes.</li> <li>the methods section is updated to reflect funding and consenting of infrastructure.</li> </ul>
		UFD-P7	Support in part	MDC supports UFD-P7 (2)(b) that enables papakāinga housing and marae on Māori owned land. Care should be taken to not limit papakāinga housing options.	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.
		Whole PC3	Clarification sought	Only Fielding 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.	MDC seeks clarification as to how PPC3 applies to urban areas that are not classified as urban environments under the NPS-UD.
		UFD-P6	Amend	The heading of URD-P6 does not reflect the purpose of NPS-UD 2020 Policy 3.8(3).	The heading of URD-P6 be replaced with the following: <i>“URD-P6 Criteria for evaluating unanticipated or out-of-sequence development”</i>
		Issues and Objectives	Amend	These sections contain topic headings rather than resource management issues or objectives.	MDC recommends that the issues and objectives be amended.
11	Palmerston North City Council	UFD-O3	Support in part/ Amend	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.	We request that UFD-O3(1)(c) be amended to exclude <b><u>“that relates well to its surrounding environment”</u></b> .

Sub No.	Submitter Name	Specific Plan Provision	Support/ Oppose	Reasons	Decision/Action Requested
		UFD-O5	Amend	If strictly interpreted, this objective could be difficult to give effect to.	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	Amend	Integration of infrastructure with land use should not be the sole responsibility of local territorial authorities. Horizons is responsible for providing flood protection infrastructure.	PNCC request that UFD-P1 be amended to recognise that Horizons also has a key role in aligning infrastructure provision with land use planning.
		UFD-P2	Amend	We request that the short-medium term figures be updated to 5,046 to align with PNCC's adopted housing bottom lines	We request that this policy be amended to exclude reference to <b><u>"that relates well to its surrounding environment"</u></b> .
		UFD-P4	Support in part/ Amend	The same rationale on UFD-O3 equally applies to UFD-P4(1)(b).	
12	Rangitikei District Council	Scope and Background	Amend	<p>Council recommends that this Section is updated to reflect the NPS-HPL.</p> <p>It is important that towns and settlements that don't meet the urban environment definition grow in a manner that creates well-functioning communities.</p>	<p>That:</p> <ul style="list-style-type: none"> <li>the section "Urban growth and rural residential subdivision on versatile soils" be updated in its entirety to reflect and align with the NPS-HPL.</li> <li>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.</li> </ul>
		Issues	Amend	Council suggests further consideration is given to the drafting of the issues.	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	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS.	Remove all objectives and policies related to versatile land, or make amendments to ensure alignment with the NPS-HPL.

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					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.
		UFD-P1	Amend		Amend the wording of UFD-P1 to replace the word must, with a less stringent alternative (e.g. should consider the value in).
		UFD-P4(1)(d) and UFD-P4(1)(b)	Amend		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.
		UFD-P7	Amend		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	Amend	Council suggests consideration is given to adding clarity on the responsibilities and the intentions of the Regional Council in each of the methods.	That: <ul style="list-style-type: none"> <li>the roles and responsibilities of the Regional Council and territorial authorities are clarified in each method.</li> <li>the Regional Council commits to the commissioning of natural hazard information</li> </ul>

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					<p>required to ensure the effective planning our towns and settlements in the Rangitikei.</p> <ul style="list-style-type: none"> <li>the methods are refined to remove reference to specific actions, as there is likely to be a diversity of approaches suitable across the region.</li> <li>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.</li> </ul>
		Principal Reasons	Amend	Once amendments are made to the issues, this section will also need to be updated.	<p>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.</p> <p>Remove or update UFD-PR2 to reflect/align with the NPS-HPL.</p>
		Anticipated Environmental Outcomes	Amend	Council recommends that these are reviewed once amendments are made to the wider provisions to ensure alignment.	That the anticipated environmental results are reviewed to ensure alignment with the wider chapter.
		Definitions	Amend	Council suggest only referencing the NPS-UD (rather than copying the wording) to future proof against possible updates to the definitions in the NPS-UD.	
13	Dr Chris Teo-Sherrell	Scope and Background	Amend	The statement 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 <u>does</u> reduce options for their future productive use.	<p>Reword to:</p> <p>Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto the more versatile soils <del>may almost always results in a reduction of</del> <u>reduces</u> options for their future productive use. <del>This may</del> <u>Such reduction in options</u> adversely affects the ability of future generations to meet their reasonably foreseeable needs.”</p>
		UFD-I2	Amend	Same rationale as above.	<p>Reword to:</p> <p>Urban growth and rural residential subdivision* (“lifestyle blocks”), on versatile soils <del>may almost always results in</del></p>

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					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, <del>most notably Palmerston North.</del>
		UFD-O2	Amend	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.	Change to read: To ensure that Territorial Authorities* consider the benefits of retaining Class I and II <sup>1</sup> versatile soils <sup>2</sup> for use as production land* when providing for urban growth and rural residential subdivision* <u>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.</u>
		UFD-P3	Amend	Same rationale as above.	Change to read as: 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 <u>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.</u>
		UFD-P4(2)	Amend	I would also like to see the protection of versatile soils mandated.	Addition to policy: <u>(e) avoids using versatile soils except in the most exceptional of circumstances.</u>
		UFD-P8(2)(a)	Amend	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.	Territorial Authority* decisions and controls: (a) on subdivision* and land* use must ensure that sustainable transport options such as public transport*, walking and cycling <del>can be</del> are integrated into land* use development, and



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14	Fonterra Ltd	UFD-O3	Support with amendment	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.	Amend UFD-O3(1) to read as follows: <i>The intensification and expansion of urban environments: (1) contributes to well-functioning urban environments that: (b) increase <u>the capacity and choice available within housing and business land</u> <del>capacity and housing choice,</del></i>
		UFD-P4	Support with amendment	As above. The first part of UFD-P4 also does not explicitly relate to business land.	Amend UFD-P4(1) to read as follows: <i>(1) Intensification and expansion of urban environments* is provided for and enabled in district plans^ where: (bb) it provides for a range of business land that enable <u>different business types, site* size and densities that relate well to the surrounding environment,</u></i>
		UFD-P8	Support with amendment	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.	Amend UFD-P8(1) to read as follows: <i>(1) Urban environments* are developed in ways that reduce greenhouse gas^ emissions and improve resilience to the effects* of climate change^ by: (a) use of urban design, building form and infrastructure^ to minimise, <u>as far as reasonably practicable,</u> 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>
		UFD-O2 & UFD-P3	Support with amendment	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.	Amend UFD-O2 to read as follows: <i>To ensure that Territorial Authorities consider the benefits of retaining <u>Highly Productive Land* Class I and II versatile soils</u> for use as production land when providing for urban growth and rural residential subdivision*.</i>

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				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.	<p>Amend UFD-P3 to read as follows:  <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:  <u>Highly Productive Land:</u>  <u>has the same meaning as in the National Policy Statement for Highly Productive Land 2022</u></p>
15	New Zealand Defence Force	UFD-I3	Amend	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. The existing provisions of the RPS appropriately provide for this approach. However there is no connection between these existing RPS provisions and PC3.	Amend to include: 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>and on infrastructure and physical resources of regional or national importance</u> , and improves resilience to the effects* of climate change^.
		UFD-O3	Amend	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.	Amend to include: The intensification and expansion of urban environments*: (1) contributes to well-functioning urban environments* that <u>(e) protects infrastructure and physical resources of regional or national importance and provides for its ongoing operation, and</u>
		UFD-P4	Amend		Amend to include:

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					<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, <u>and avoids adverse effects, including reverse sensitivity effects, on infrastructure and resources of regional or national importance.</u></p>
16	Robert McLachlan	Whole PC3	Support	I support the move to urban intensification, more compact urban forms, prevention of urban sprawl, and reducing greenhouse gas emissions. 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.	-
17	Kāinga Ora-Homes and Communities	UFD-O5	Support in part	Kāinga Ora supports this policy but seeks further expansion to make the objective clearer and directive.	<p>Change to:</p> <p><u>Regional and district plans contribute to the region being Urban environments* resilient to the effects* of climate change^ and support reductions in greenhouse gas^ emissions, and where climate change mitigation is an integral part of well-functioning urban environments* and rural areas.</u></p>
		UFD-P2	Support in part	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.	<p>Change to:</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 and the Horowhenua District Plan.</i></p>
		UFD-P4(2)(d)	Support in part	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	<p>Change to:</p> <p><i>(d) manages adverse reverse sensitivity effects* <u>from out of sequence development</u> on <del>land with existing incompatible</del></i></p>

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				protected from reverse sensitivity effects, as the Horizon's Region has a lot of valuable productive land.	<del>activities adjacent to the urban environment*</del> <u>boundary rural or open space land valued for its productive, ecological, aesthetic and recreational qualities.</u>
		UFD-P4(1)(d)	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, and - align with the wording of the NPS-UD.	Change to: UFD-P4: Urban intensification and expansion. 1. d) development is <del>well</del> <u>adequately</u> serviced by existing or planned development infrastructure* and <u>equitable</u> public transport*, and additional infrastructure* required to service the development capacity* is likely to be achieved.
		UFD-P5	Support in part	Kāinga Ora seeks additional wording to enable papakāinga development in urban areas, reduce any ambiguity for those district/city plan provisions and recognise that the diverse need for housing typologies and layouts.	Change to: The form and design of subdivision, use and development in urban environments* is managed so that it: <u>(4) Promotes papakāinga in urban settings by providing plan enabled urban papakāinga, including on general title land.</u>
		UFD-P8(1)	Support in part	Kāinga Ora considers that this policy needs to refer to a definition for “best practice resilience” and a definition of best practice is introduced as this term is currently ambiguous.	Definitions to be added to One Plan as below: <u>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):</u> <u>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, identity and structure.</u> <u>Resilience is a positive attribute when it allows systems to maintain their capacity to adapt, learn and/or transform.</u>
		Method 1	Support in part	The RPS should be amended to require that a Housing and Business Development Capacity Assessments and Future Development Strategies be prepared for Levin.	Change to: This includes a requirement for the Regional Council, <del>and</del> 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*

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		Method 2	Support in part	The RPS should be amended to require that a Housing and Business Development Capacity Assessments and Future Development Strategies are prepared for Levin.	Change to: <i>The aim of this method is to undertake strategic planning to meet the objectives and policies of this Chapter. The Regional Council, together with, <del>and</del> 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> <i>In addition, the Regional Council, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council</u> will jointly prepare Future Development Strategies*.</i>
		Method 4	Support in part	Meaningful advocacy requires consultation and partnership, Kāinga Ora request that Method 4 is amended to reflect this and look forward to working closely with Council.	Change to: <i>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.</i>
18	Philip Lake	UFD-O3 UFD-P4 UFD-P8 Method 2 Method 4	Amend	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 focused in Whanganui and Palmerston North. Public transport improvements need to be implemented.  Horizons should be collaborating with neighbouring Regional Councils and lobbying government for funding and assistance to implement public transport services.	Insert much stronger links between public transport planning and the One Plan (and Spatial Plans, District Plans and subdivision consents).
19	National Public Health: MidCentral, Te Whatu	UFD-O2	Amend	We think that the phrase 'consider the benefits of retaining class I and II soils' needs a stronger word than consider.	Amend this provision as follows: To ensure that Territorial Authorities give due consideration to the benefits of retaining class I and II soils.
		UFD-O3	Amend	We wish to include active transport under section UFD-03 (2)(b). Active transport is accessible and well	Under UFD-O3 (2)(b) add the suggested words "and includes options that encourage active transport".

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	<b>Ora, Health New Zealand.</b>			connected by a choice of transport modes including walking, cycling and public transport.	
		UFD-P2	Amend	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. 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.	It is essential that communal green spaces are included any urban intensification planning.  With regard to housing bottom lines, a similar approach is suggested for tier 3 local authorities.
		UFD-P3	Neutral	We suggest that this and other relevant parts of the Urban Development Plan Change (PC3) are cross-referenced to the NPS-HPL 2022.	Cross reference this policy to the NPS-HPL.
		UFD-P4	Amend	1. We wish to minimise potential risks to health from intensification. 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*. 4. We suggest that equity is considered in the way that urban intensification is done.	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. 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
		UFD-P8	Amend	The Public Health Service considers that in times of drought, earthquake or climate change emergencies, consideration is given to emergency water supplies.	That this policy UFD-P8: Urban development and climate change^ be re-worded to include a statement regarding emergency water supplies.



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		Definitions	Amend	We consider that the 'development infrastructure' 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.	The proposed plan change is future proofed for any developments occurring through Three Waters.