



New Zealand Defence Force  
 Defence Estate and Infrastructure  
 NZDF Headquarters  
 Private Bag 39997  
 Wellington 6045

## Further Submission on Proposed Plan Change 3 (Urban Form & Development) – Horizons One Plan

**To:** Planning Technician

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

**Email:** [submissions@horizons.govt.nz](mailto:submissions@horizons.govt.nz)

**Submitter:** New Zealand Defence Force

**Contact Person:** Lucy Edwards, Senior Statutory Planner, Defence Estate and Infrastructure

**Address for Service:** New Zealand Defence Force  
 Private Bag 39997  
 Wellington 6045  
 Attention: Lucy Edwards

**Phone:** +64 21 934 270

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This is a further submission by the New Zealand Defence Force (NZDF) on proposed Plan Change 3 (Urban Form & Development) – Horizons One Plan.

NZDF has an interest in the proposal that is greater than the interest of the general public as NZDF represents a relevant aspect of the public interest<sup>1</sup>.

The table annexed as **Appendix A** and forming a part of this further submission contains:

1. The submissions which NZDF supports or opposes;
2. The particular parts of those submissions supported or opposed;
3. Reasons for support or opposition; and
4. The decision sought by NZDF (whether the submission should be allowed or disallowed).

NZDF **does** wish to be heard in support of its further submission. If others make a similar submission, NZDF will consider presenting a joint case with them at a hearing.

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<sup>1</sup> Set out in section 5 of the Defence Act 1990

A copy of this further submission has been sent to each person who made the original submission.

A handwritten signature in black ink, appearing to be 'L. Edwards', written in a cursive style.

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Person authorised to sign  
on behalf of New Zealand Defence Force

Date 24/02/2023

## Appendix A: Further Submissions on Plan Change 3

Ref#	NZDF supports or opposes the submission of:	Support or opposition	The particular part of the submission NZDF supports or opposes is:	The reasons for NZDF support or opposition are:	NZDF seeks the following:
1	Transpower	Support in part	UFD-O3	<p>NZDF supports this submission point in so far as it seeks to provide for protection of infrastructure through the management of effects of intensification and expansion of urban environments. The ongoing protection and operation of defence facilities is of primary importance for NZDF.</p> <p>However, NZDF deems it more appropriate to refer to 'Infrastructure^ and other Physical Resources of Regional or National Importance' (as set out in Policy 3-1). The list of 'Infrastructure and other Physical Resources of Regional and National Importance' set out at Policy 3-1 includes Transpower assets and would provide a more tailored region-specific definition than the NPS-UD definition.</p>	<p>The submission be allowed with amendments.</p> <p>A definition of 'Infrastructure^ and other Physical Resources of Regional or National Importance' be added that refers back to Policy 3-1.</p>
2	Transpower	Support in part	UFD-P4	<p>NZDF supports this submission point in so far as it seeks to provide for protection of infrastructure through the management of effects of intensification and expansion of urban environments. The ongoing protection and operation of defence facilities is of primary importance for NZDF.</p> <p>However, NZDF deems it more appropriate to refer to 'Infrastructure^ and other Physical Resources of Regional or National Importance' (as set out in Policy 3-1).</p>	<p>The submission be allowed with amendments.</p> <p>A definition of 'Infrastructure^ and other Physical Resources of Regional or National Importance' be added that refers back to Policy 3-1.</p>
3	Transpower	Support	UFD-P6	<p>NZDF supports the proposed amendments to this provision, particularly the second alternative that proposes to remove "as far as reasonably practicable", on the basis that it would provide greater direction to the user of the plan.</p> <p>NZDF considers it necessary that a definition of 'Infrastructure^ and other Physical Resources of Regional or National Importance' be added that refers back to Policy 3-1.</p>	<p>The submission be allowed.</p> <p>A definition of 'Infrastructure^ and other Physical Resources of Regional or National Importance' be added that refers back to Policy 3-1.</p>

<i>Ref#</i>	<i>NZDF supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission NZDF supports or opposes is:</i>	<i>The reasons for NZDF support or opposition are:</i>	<i>NZDF seeks the following:</i>
4	Transpower	Oppose	Definitions	The Horizons Plan contains a very specific list of “Infrastructure^ and other Physical Resources of Regional or National Importance” in Policy 3-1 and therefore NZDF considers that a definition reflective of this approach is more appropriate.	Reject the proposed changes by Transpower.  A definition of ‘Infrastructure^ and other Physical Resources of Regional or National Importance’ be added that refers back to Policy 3-1.
5	KiwiRail	Support	UFD-11	NZDF supports the inclusion proposed by KiwiRail 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. Reverse sensitivity is a key concern for NZDF as it has the potential to impact on the ongoing safe and efficient operation of defence facilities.	The submission be allowed.
6	KiwiRail	Support in part	UFD-13	NZDF supports the amendment proposed by KiwiRail to recognise that growth needs to be provided for in a way that avoids the potential for reverse sensitivity effects. However, NZDF considers that ‘transport corridors’ should be broadened to read “Infrastructure^ and other Physical Resources of Regional or National Importance” to recognise that potential reverse sensitivity effects affect a number of different infrastructure facilities and assets, including defence facilities.	The submission be allowed.  If the submitter’s relief is accepted, then “Infrastructure^ and other Physical Resources of Regional or National Importance” should replace “transport corridors”
7	KiwiRail	Support	UFD-O1	NZDF support the inclusion proposed by KiwiRail to ensure reverse sensitivity effects are appropriately managed.	The submission be allowed.
8	KiwiRail	Support in part	UFD-P1	NZDF support the amendment proposed by KiwiRail to recognise that growth needs to be provided for in a way that avoids the potential for reverse sensitivity effects. However, NZDF considers that ‘transport corridors’ should be broadened to read “Infrastructure^ and other Physical Resources of Regional or National Importance” to recognise that potential reverse sensitivity effects affect a number of different infrastructure facilities and assets, including defence facilities.	The submission be allowed.  If the submitter’s relief is accepted, then “Infrastructure^ and other Physical Resources of Regional or National Importance” should replace “transport corridors”

<i>Ref#</i>	<i>NZDF supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission NZDF supports or opposes is:</i>	<i>The reasons for NZDF support or opposition are:</i>	<i>NZDF seeks the following:</i>
9	KiwiRail	Support	UFD-P2	NZDF support the inclusion proposed by KiwiRail to ensure reverse sensitivity effects on infrastructure, are carefully managed but considers that it should read "safe and efficient operation of 'infrastructure^ and other Physical Resources of Regional or National Importance' for consistency with the Plan and points above.	The submission be allowed with amendments.  If the submitter's relief is accepted, then "Infrastructure^ and other Physical Resources of Regional or National Importance" should replace "infrastructure, including transport corridors"

## Address of submitters

Submitter	Address
Transpower	C/o: Trudy Burney Transpower 31 Gilberthorpes Road, Islington 8042, Christchurch environment.policy@transpower.co.nz
KiwiRail	C/o: Pam Butler KiwiRail Holdings Limited Private Bag 92138, Victoria Street West, Auckland 1142



## FONTERRA LIMITED

### FURTHER SUBMISSIONS ON PROPOSED CHANGE 3 (NPS - URBAN DEVELOPMENT) TO THE MANAWATŪ-WHANGANUI REGIONAL POLICY STATEMENT

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**To:** Manawatū-Whanganui Regional Council (Horizons)  
Private Bag 11025  
Palmerston North 4442

Via email:  
[submissions@horizons.govt.nz](mailto:submissions@horizons.govt.nz)

**SUBMITTER:** FONTERRA LIMITED

**Contact:** Suzanne O'Rourke

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

**M** +64 27 288 0489

**E** [Suzanne.orourke@fonterra.com](mailto:Suzanne.orourke@fonterra.com)

Fonterra is a person who has an interest in the proposal that is greater than the interest that the general public has. It 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.

The Manawatū 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. Fonterra has an interest in ensuring that the Regional Policy Statement enables a well functioning urban environment that supports the economic wellbeing of the community, including via providing for it to continue its contribution to the regional and national economy through its research and processing sites.

Fonterra made submissions on PC3, listed as Submission 14.

The attached schedule sets out Fonterra's further submissions in respect of points made by other parties.

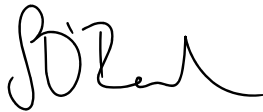
Fonterra wishes to be heard in support of this submission. If others are making a similar submission, Fonterra will consider presenting a joint case with them at the hearing.

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

I can confirm that copies of this further submission have been served on the person making the original submission.

Dated: 28 February 2023

Fonterra Limited



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**Suzanne O'Rourke**



## ATTACHMENT A: FONTERRA LIMITED'S FURTHER SUBMISSIONS ON PROPOSED CHANGE 3 TO THE MANAWATŪ-WHANGANUI REGIONAL POLICY STATEMENT

SUB #	SUBMITTER NAME	SEC OF PLAN	SUPPORT/ OPPOSE	REASON
4	KiwiRail Holdings Ltd	UFD-Issue 01: Amend to add "it can also have the potential to create land use conflicts and reverse sensitivity effects"	Support	<p>Fonterra relies on the safe and efficient operation of the transportation corridors including the local and State Highway roading network, and rail corridors for its ongoing operations in the Manawatū-Whanganui Region including tanker transport of milk to the Longburn processing site and the use of the rail network to convey concentrated milk products from the Longburn site to the other processing sites within the region and throughout the country. The safe and efficient operation of these transport corridors, including protecting these corridors from reverse sensitivity effects is critical to the ongoing operation of the processing sites and their contribution to the local and regional economy.</p> <p>Urban development around the Longburn processing site is also likely through District Plan Changes which will be enabled by PC3 and the NPSUD. As set out in Fonterra's original submission, Fonterra support the provision of appropriately zoned land that will support the urban development and well-functioning urban environment of Palmerston North City. Fonterra seek to ensure that its operations and their contribution to the local and regional economy are protected from reverse sensitivity effects which may result in unnecessary restrictions on those operations such that their ongoing viability is affected.</p>
		UFD-Issue 03: Amend to add "avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors"	Support	
		UFD-Objective 01: Amend to add "(5) land use conflicts are minimised as far as practicable, including avoiding the potential for reverse sensitivity effects"	Support	
		UFD-Policy 01: Amend to add "(3) ensure development avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors"	Support	
		UFD-Policy 02: Amend to add "(4) The development avoids the potential for reverse sensitivity effects on the safe and efficient operation of infrastructure, including transport corridors."	Support	



## Further Submission on Proposed Plan Change 3 to the Horizons Regional Policy Statement by Kāinga Ora – Homes and Communities

### Clause 8 of Schedule 1 to the Resource Management Act 1991

**To:** Horizons Regional Council  
Private Bag 11025  
Manawatū Mail Centre  
Palmerston North 4442  
*Submitted via email to: [submissions@horizons.govt.nz](mailto:submissions@horizons.govt.nz)*

**Name of Further Submitter:** Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities** (“**Kāinga Ora**”) makes this further submission on the **Proposed Plan Change 3** (“**PC3**”) to the Horizons Regional Policy Statement in support of/in opposition to original submissions to the **PC3**.
2. Kāinga Ora has an interest in PC3 that is greater than the interest the general public has, being an original submitter on the PC3 with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in the Horizons Region.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the PC3.

#### **Reasons for further submission**

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:

- (a) The reasons set out in the Kāinga Ora primary submission on the PC3.
  - (b) In the case of the Primary Submissions that are opposed:
    - (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 (“**RMA**”);
    - (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
    - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
    - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
  - (c) In the case of Primary Submissions that are supported:
    - (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
    - (ii) The reasons set out in the Primary Submissions; and
    - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

**DATED 28 February 2023**

**Kāinga Ora – Homes and Communities**



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**Brendon Liggett**

**Manager – Development Planning**

**ADDRESS FOR SERVICE:**

*Kāinga Ora – Homes and Communities*

*PO Box 74598*

*Greenlane, Auckland*

*Attention: Development Planning Team*

*Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)*

## Appendix A – Further Submission Table

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Waka Kotahi	2.9		Amend	<p>Support with amendments to UFD-P4:</p> <p>(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*...</p> <p>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: ....</p> <p>(c) is well-connected <u>by a variety of transport modes and along</u> transport corridors,</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 <u>by enabling</u> active transport* <u>infrastructure</u>.</p>	Support in Part	Kāinga Ora supports submission 2.9 to the extent that it is consistent with the Kāinga Ora primary submission.	Allow in Part
Waka Kotahi	2.11		Support in Part	<p>Support with amendments to UFD-P6:</p> <p>(1) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: ....</p> <p>(b) is well-connected <u>by a variety of transport modes and along</u> transport corridors, <u>and</u> to community and <u>commercial</u> services, and open space, ...</p>	Support in Part	Kāinga Ora supports, in part, submission 2.11, to the extent that it is consistent with the Kāinga Ora primary submission.	Allow
KiwiRail	4.1	UFD-11	Support in Part	<p>Amend to:</p> <p>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...</p>	Oppose	Kāinga Ora opposes the relief sought.	Disallow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
KiwiRail	4.2	UFD-I3	Support in Part	Amend to:  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</del> 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.	Oppose	Kāinga Ora opposes the relief sought, particularly in relation to “avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors...”  Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of transport corridors should first be mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to consider ‘potential reverse sensitivity effects on transport corridors’ for reverse sensitivity effects is ambiguous, overly directive, and places undue responsibility on the receiving environment to mitigate adverse effects.	Disallow
KiwiRail	4.3	UFD-O1	Support in Part	Add clause:  <u>(5) land use conflicts are minimised as far as practicable, including avoiding the potential for reverse sensitivity effects.</u>	Oppose	Kāinga Ora opposes the relief sought.	Disallow
KiwiRail	4.6	UFD-P1	Support in Part	Add clause:  <u>3) ensure development avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.</u>	Oppose	Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of transport corridors should first be mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to consider ‘conflicting landuses’ for reverse sensitivity effects is ambiguous, overly directive, and places undue responsibility on the receiving environment to mitigate adverse effects. Noting also that lower density in areas that have been identified for growth is not an efficient landuse.	Disallow
KiwiRail	4.7	UFD-P2	Support in Part	Add clause:  <u>(4) The development avoids the potential for reverse sensitivity effects on the safe and efficient operation of infrastructure, including transport corridors.</u>	Oppose	Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of transport corridors should first be mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to consider ‘conflicting landuses’ for reverse sensitivity effects is ambiguous, overly directive,	Disallow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
						and places undue responsibility on the receiving environment to mitigate adverse effects. Noting also that lower density in areas that have been identified for growth is not an efficient landuse.	
Summerset Group Holdings Limited	6.4	UFD-P2	Support in Part	Delete reference to “in urban environments” as follows:  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:	Support	Kāinga Ora supports the clarity provided through the deletion of urban environments, noting the urban environment will increase through long term provision of development capacity.	Allow
Summerset Group Holdings Limited	6.6	UFD-P6	Support in Part	Amend:  (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	Support in part	Kāinga Ora supports an amendment to the wording of the policy to allow out of sequence development to be coupled with planned transport corridors, community service and open space and not just existing infrastructure and services.	Allow in part
Horowhenua District Council	7.4	All Objectives and Policies	Support in Part	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.	Support in part	Kāinga Ora supports the clarity sought within this submission.	Allow
Horowhenua District Council	7.5	General Provisions	Oppose in Part	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.	Oppose	Kāinga Ora oppose the relief sought as it is inconsistent with the objective and policies of the NPS-UD, which specifically refers to both Regional Policy Statements and District Plans relating to density requirements.	Disallow
Horowhenua District Council	7.6	UFD-O3 and UFD-P4	Support in Part	We have concern that the wording of provisions such as UFD-O3 and UFD-P4(1)(d) and (2)(c) may have unintended (effects sic) for communities such as the Horowhenua District. We would prefer to see wording that	Oppose	Kāinga Ora oppose the relief sought, as PC3 already proposes UFD-O3(2)(b) and UFD-P4(1)(d) to include reference to existing or planned public transport.	Disallow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p>recognises that greenfields areas in particular should be designed to accommodate future public transport.</p> <p>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. Clarify that the provision of public transport is a Regional Council function.</p>			
Horowhenua District Council	7.7	UFD-P4	Oppose in Part	<p>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.</p> <p>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.</p>	Oppose in part	<p>Whilst Kāinga Ora recognise the need for greenfield development, such development must still meet the requirements outlined within Policy 4 to provide for well-functioning urban environments. Kāinga Ora does not consider that greenfield development should be provided separate provisions.</p> <p>Out of sequence developments need to meet the tests required under Policy UFD-P6 to ensure that they will add significantly to development capacity and contribute to a well-functioning urban environment.</p>	Disallow
Horowhenua District Council	7.10	UFD-P7(2)(b)	Support in Part	<p>We consider the wording of UFD-P7(2)(b) to be overly restrictive in that it does not provide for these land uses to establish on landholdings outside of Māori ownership.</p> <p>Remove the reference to Māori owned land in UFD-P7(2)(b).</p>	Support in part	<p>Kāinga Ora supports provisions that enable Maori to develop their own land in a manner that supports their aspirations. Kāinga Ora however note that consistent with its own submission that papakāinga should also be provided for on general title land.</p>	Allow in part
Manawatū District Council	10.5	UFD-P7(2)(b)	Support in Part	<p>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.</p> <p>MDC seeks assurance that UFD-P7 will not limit the ability for Māori to construct papakāinga housing on land that is not held in Māori title.</p>	Support in part	<p>Kāinga Ora supports provisions that enable Maori to develop their own land in a manner that supports their aspirations. Kāinga Ora however note that consistent with its own submission that papakāinga should also be provided for on general title land.</p>	Allow in part



Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Manawatū District Council	10.6	PC3	Support in Part	<p>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.</p> <p>MDC seeks clarification as to how PPC3 applies to urban areas that are not classified as urban environments under the NPS-UD.</p>	Support	Kāinga Ora supports separate policies and methods to address growth within urban areas that are not defined as an 'urban environment' within the NPS-UD and RPS for clarity. Noting that these areas are also subject to providing for well-functioning urban environments.	Allow
Palmerston North City Council	11.1	UFD-O3	Support in Part/Amend	<p>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.</p> <p>We request that UFD-O3(1)(c) be amended to exclude <b><u>"that relates well to its surrounding environment"</u></b></p>	Support	Kāinga Ora supports the submission as it is in line with the NPS-UD where it is recognised that urban environments, including their amenity values, develop and change over time.	
Rangitīkei District Council	12.1	Scope and Background	Support in Part	<p>Council recommends that this Section is updated to reflect the NPS-HPL. 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>	Support	<p>Kāinga Ora supports the inclusion of provisions that acknowledge the NPS-HPL.</p> <p>Kāinga Ora supports separate policies and methods to address growth within urban areas that are not defined as an 'urban environment' within the NPS-UD and RPS for clarity. Noting that these areas are also subject to providing for well-functioning urban environments.</p>	Allow
Rangitīkei District Council	12.6	UFD-P7	Support in Part	<p>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.</p>	Support	Kāinga Ora supports provisions that enable Maori to develop their own land which is consistent with its own submission.	Allow