

**BEFORE HEARING COMMISSIONERS  
FOR THE MANAWATŪ-WHANGANUI REGIONAL COUNCIL**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ  
MO TE KAUNIHERA Ā ROHE O MANAWATŪ-WHANGANUI**

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**IN THE MATTER** of the Resource Management Act 1991 (“**the Act**”)

**AND**

**IN THE MATTER** of the hearing of Submissions and Further Submissions on Proposed Plan Change 3 (Urban Form & Development) to the Manawatū-Whanganui Regional Plan (Horizons One Plan)

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**END OF HEARING REPLY OF LEANA SHIRLEY ON BEHALF OF MANAWATŪ-  
WHANGANUI REGIONAL COUNCIL**

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Dated: 8 March 2024

**MAY IT PLEASE THE COMMISSIONERS:**

- [1] My full name is Leana Mary Shirley
- [2] I am the reporting officer for Plan Change 3 (PC3) to the Manawatu-Whanganui Regional Council's One Plan Regional Policy Statement. I attended the hearings for this plan change on the 7<sup>th</sup> and 8<sup>th</sup> February 2024.
- [3] My Section 42A report, at paragraphs 8 to 12 outline my experience and qualifications.
- [4] I repeat the confirmation given in my Section 42A Report that I have read and will comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that this report has been prepared in compliance with that Code.

**A. SCOPE OF REPLY**

- [5] This reply has been prepared to:
- Provide answers to questions raised by Panel members during the hearing and outlined in Minute 3; and
  - Clarify other matters arising as a result of, or since the hearing.
- [6] This Reply is accompanied by my recommended re-drafting of the PC3 provisions in Appendix 1. Amendments are identified as follows:
- Purple underline and black ~~strikethrough~~ represents the changes and new provisions proposed in PC3 as notified
  - Blue underline and ~~strikethrough~~ represent the changes recommended through the s42A report
  - Black underline and black ~~underlined-strikethrough~~ represent the amendments recommended in my Rebuttal evidence; and

- Orange underline and ~~strikethrough~~ represent the further amendments recommended in this reply.

**B. RESPONSE TO QUESTIONS FROM THE PANEL**

**Question (a) Extent that the NPS-FM and NPS-IB should be given effect to through the PC3 provisions**

- [7] My view is that where the National Policy Statement for Freshwater Management (“NPS-FM”) and National Policy Statement for Indigenous Biodiversity (“NPS-IB”) contain provisions that relate to effects from urban development and expansion, then these may need to be ‘given effect to’ through PC3.
- [8] However, I note that the position above is subject to there being ‘scope’ in relation to these issues. While submissions on these topics may be ‘on’ the plan change, there must be a submission requesting relief on the point such that any modifications made at this stage are within the scope of submissions.
- [9] I deal with these issues below.

NPS-IB

- [10] As to scope, in my opinion the ability to consider further modifications is constrained due to the absence of submissions seeking relief on this matter. The only potentially relevant submission is that of Dr Sharon Stevens (submission number 8), who requests the One Plan promote the use of rain gardens inclusive of biodiversity.
- [11] Turning to what the NPS-IB requires, its objective is to “maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity...”. It introduces requirements for local authorities to prepare plan changes and, in the case of the regional council, biodiversity strategies, to give effect to this objective.
- [12] The timing provisions of the NPS-IB are relevant in that they require the regional council to prepare and notify a plan change:

- to give effect to the Significant Natural Area (SNA) provisions within 5 years of the NPS-IB coming into effect (clause 4.2(1)).
- To give effect to other elements of the NPS-IB within 8 years (clause 4.1(2)).

[13] In addition, regional councils must complete a regional biodiversity strategy within 10 years from commencement of the NPS-IB.

[14] PC3 is not the plan change being prepared for the purpose of giving full effect to the NPS-IB. A separate process is being undertaken by Council to scope any future plan change that may be required to give effect to the NPS-IB. At this early stage of the process, the level of inconsistency of the One Plan with the NPS-IB and the likely direction of any plan change is still being established.

[15] Horizons Regional Council controls land use to protect indigenous biodiversity through rules associated with its scheduling (not mapping) of rare, threatened, and at-risk habitats in Schedule F<sup>1</sup> of the One Plan. The scheduled areas and habitat type are supported by policy direction in Chapter 6<sup>2</sup> of the RPS and rules in Chapter 13<sup>3</sup> of the regional plan. The current One Plan does not map SNAs.

[16] In my view, UFD-P4(1)(e) provides appropriate protection based on the current approach in the One Plan to protect areas of significance. I do not consider further modification to be required to align with the NPS-IB at this stage.

[17] For these reasons, 'giving effect' to the NPS-IB does not require further changes to the provisions of PC3, and in any case it is my opinion that there are constraints to the 'scope' available within submissions to make further changes.

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<sup>1</sup> Now RP-SCHED6 under Plan Amendment 3

<sup>2</sup> Now RPS-ECO under Plan Amendment 3

<sup>3</sup> Now RP-ECO under Plan Amendment 3

## NPS-FM

- [18] The NPS-FM requires maintenance and improvement of water quality. It directs Councils to prepare and notify plan changes to give effect to the NPS ‘as soon as reasonably practicable’.
- [19] Council has commenced a plan change to give effect to the NPS-FM, this is known as ‘Oranga Wai’. The timing for notification of the Oranga Wai plan change is yet to be determined by Council, following announcements from the new coalition government in late 2023.
- [20] The Wellington Fish and Game Council submission (submission number 5) requests amendments to UFD-I3, UFD-O1(2), UFD-O3(1), UFD-P1(2) and UFD-P8(1) to better integrate PC3 with the requirements of the NPS-FM and ensure urban development creates healthier natural environments, particularly for freshwater.
- [21] In my opinion, the issue and objective cascade provides sufficient overarching direction to ensure there is no conflict with the NPS-FM. The suggested rewording of Issue 3 (UFD-I3)<sup>4</sup> includes reference to the impacts poorly planned development can have on the environment and Objective UFD-O3(1)(e) seeks to ensure urban development and expansion “manages adverse environmental effects”. I am satisfied that these provisions provide the overarching direction to ensure adverse environmental effects, including potential effects on freshwater, are managed.
- [22] Recognising the relationship between freshwater quality with urban intensification and expansion, Policies 3, 4 and 15 of the NPS-FM may have more relevance to matters addressed in this plan change, and others may have some indirect relevance. Further, clause 3.5 appears to have relevance, by providing direction to regional councils and territorial authorities, centred on an integrated approach to various aspects of freshwater management,

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<sup>4</sup> Refer to paragraphs 53-56 under the heading **Framing of the issues**

including with regard to the use and development of land through regional policy statement direction (clause 3.5(2)).

[23] Despite this, I wish to express caution regarding the potential side-effects or unintended consequences of isolating provisions of the NPS-FM for implementation through this plan change, without the thorough provision-by-provision analysis that will be undertaken through Oranga Wai. In my view, the consideration of these policies is necessary within the entire NPS-FM framework. I would not recommend changes that require more detailed consideration than what can be achieved at this stage of PC3.

[24] A minor intervention may nevertheless be appropriate for UFD-P4, to recognise the relationship between urban intensification and expansion and acknowledge and reinforce the NPS-FM direction to territorial authorities as per clause 3.5(4). As the provision would likely be relevant to territorial authority urban intensification and expansion plan change processes, such a policy would be reinforcing the same direction already provided through the NPS-FM.

[25] Clause 3.5(4) of the NPS-FM states:

*3.5(4)*

*Every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.*

[26] I suggest a new clause (g) be added to UFD-P4(1) as follows (deleted text is shown in orange ~~strikethrough~~ and new text in orange underline):

#### **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 and business<sup>5</sup> areas that enable different housing and/or business types, *site\** size and densities that relate well to the surrounding environment<sup>6</sup>,
- (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 enables provision of<sup>7</sup> *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; ~~and~~
- (f) the operation, maintenance and upgrade of nationally significant infrastructure\* is not compromised<sup>8</sup>, ~~and-~~
- (g) it promotes positive effects, and avoids, remedies, or mitigates the adverse effects (including cumulative effects) of urban development on the health and well-being of water bodies^, freshwater^ ecosystems, and receiving environments\*.

[27] I also recommend the NPS-FM definition for ‘receiving environments’ be included using the same format as other NPS definitions included in PC3 as follows:

*Receiving environment: has the same meaning as in clause 1.4 of the National Policy Statement for Freshwater Management 2020 (as set out below): includes, but is not limited to, any water body (such as a river, lake, wetland or aquifer) and the coastal marine area (including estuaries)*

[28] In my view this provides connection to the NPS-FM which seeks to prioritise the health and wellbeing of freshwater through Te Mana o Te Wai, without creating conflict with the existing provisions of Chapter 5 (now RPS-LF under Plan Amendment 3) of the RPS or interfering with the Oranga Wai plan change being undertaken by Council.

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<sup>5</sup> Submission point 14.2  
<sup>6</sup> Submission point 11.5 and 7.4  
<sup>7</sup> Submission points 7.5, 10.6, 12.9  
<sup>8</sup> Submission point 1.2

**Question (b) How altering reference to versatile soils to highly productive land will alter the effect of the provisions**

- [29] Altering the reference in the issue (UFD-I2), objective (UFD-O2), and policy (UFD-P3) so they refer to the NPS-HPL definition of highly productive land, has the effect of making those provisions relevant to areas mapped on NZLRI as having Class 3 soils across the region. At the same time, it means that these provisions would not apply to some areas of land in the region that have been identified for future urban development, or which have been subject to an urban rezoning, in accordance with the interim provisions under clause 3.5(7) of the NPS-HPL.
- [30] The most relevant examples of this latter category in the region are Palmerston North City Council's Braeburn Industrial Area and the Kākātangiata urban growth area. The Braeburn Industrial Area is located adjacent to Kākātangiata and Fonterra's Longburn plant.
- [31] While further areas of land will either be included or excluded by reference to the updated definition, the 'effect' of the change will not result in a significantly impactful regional direction. That is because the existing policy approach is only to "...consider the benefits of.." and "...must pay particular attention to the benefits of the retention of..." Class 1 and 2 versatile soils. While this was thought to be meaningful when the One Plan was adopted, the level of protection or recognition of the benefits of this resource has been overtaken by the stronger direction in the NPS-HPL. Therefore, given they are more recent and their relative strength, I consider the NPS-HPL provisions are likely to be given greater weight and retain more significance as to how highly productive land should be managed.
- [32] In some cases, where areas are excluded from definition as highly productive land (see above, the example of Kākātangiata and Braeburn), the effect of the change to the provisions would be that urban development within these areas would no longer need to have regard to the benefits of retaining versatile soils. Here, the change to the provisions would address inconsistency, clarifying that the approach consistent with the NPS-HPL applies, and that the benefit of



retaining any versatile soils within those existing urban zoned areas would not need to be considered in a consenting process.

[33] In my view and following discussion at the hearing, the change to highly productive land achieves consistency with the NPS-HPL, and while it is not likely to have significant effect in terms of how the provisions will apply to highly productive land, it will have slightly more significance to land that would then be excluded, ensuring consistency in terms of the resources that both the RPS and the NPS-HPL apply to in the meantime.

[34] With that said and having heard from the territorial authorities on this point, I also do not consider that there is any cost or negative to including the NPS-HPL definition of highly productive land. In my view it would provide clarity and assistance to territorial authorities, and I do not consider it would realistically lead to any confusion about the continued application of the NPS-HPL.

[35] Finally, I recall discussion at the hearing as to whether a modified definition could be made so that it excluded areas identified for future urban development but did not include class 3 soils. My concern about this approach is that it would add to confusion about the provisions, and I am not certain that I could achieve the drafting of such a provision in a tidy way. In my opinion this would compromise clarity of the definition.

[36] Overall, my recommendation remains that references to 'Class 1 and 2 versatile soils' be replaced with the defined term 'highly productive land' in PC3. If that is not preferred by the Panel, then I would prefer there to be no changes.

**Question (c) Extent of Class 3 soils surrounding urban environments**

[37] Attached as Appendix 2 to this reply is a series of maps showing the soil classification for each district in the region. These maps have been created for Council by Barker and Associates to assist with the planning process required by the NPS-HPL.

- [38] The extent of existing urban areas are shown in the maps as unmarked white areas. These maps do not provide detail on the number of hectares for each land use class but are useful to provide a high level visual of the soil types surrounding the region's urban areas.
- [39] In analysing the maps, Levin, Aokautere (Palmerston North) and Whanganui are the urban environments with larger amounts of Class 3 soils surrounding their current urban boundary.
- [40] For the region's smaller communities that do not meet the definition of an urban environment, there are Class 3 soils located adjacent to urban areas in Ohakune, Foxton, Taihape, and throughout the Tararua District.
- [41] I note that Marton is shown as being surrounded by Class 2 soils, however I have been advised that has been reclassified as Class 3 in Manaaki Whenua Landcare Research's 2021 national extended legend.

**Questions (d), (e) and (f): Nationally Significant Infrastructure and UFD-O3**

- [42] In this section, I answer several questions at once, being those questions relating to the effects of activities on infrastructure and, primarily, UFD-O3. i.e. questions:
- (d) Is there a valid basis to qualify provisions giving effect to the NPS-UD to require consideration of nationally significant infrastructure other than the National Grid (and by extension, nationally and regionally significant industry)?
  - (e) If the only legitimate qualification of provisions directing enabling of urban development relates to the National Grid, how should it be framed? In particular, should it include the qualification ("*to the extent reasonably possible*") in NPS-ET Policy 10?
  - (f) If Objective UFD-O3 is retained in essentially its current form:

- (i) should Objective UFD-O3(1)(f) be expanded to refer to facilities and assets of regional or national importance (as per Policy 3-1(b))?
- (ii) Should the level of direction be softened from “to ensure” e.g. to import the qualification in NPS-ET Policy 10 as above, or alternatively adopt the wording suggested by Counsel for Fonterra?
- (iii) should the wording be amended to make it clear that it is the operation, maintenance and upgrading of infrastructure that should not be compromised?
- (iv) What sort of “effects” is the objective focused on? Does this need clarification?

[43] Policy 1 of the NPS-UD seeks that planning decisions contribute to well-functioning urban environments. Policy 1 provides a list of what I understand as a non-exhaustive list of matters that contribute to well-functioning urban environments. I rely on legal advice for this interpretation.

[44] Objective UFD-O3 intends to implement NPS-UD Policy 1. Having reflected on discussions during the hearing, it is my view that a well-functioning urban environment is one that is sensitive to effects including reverse sensitivity effects on the surrounding environment, and as a matter of common sense, nationally significant infrastructure. In other words, I consider that a feature of a well-functioning urban environment is that it addresses compatibility issues with neighbouring land uses, including nationally significant infrastructure.

[45] For this reason, I maintain my view that it is appropriate for PC3 to include provision for management of reverse sensitivity effects on both the national grid (because of the NPS-ET) and also nationally significant infrastructure more broadly. I consider that nationally significant infrastructure is a suitable place to mark a distinction where particular consideration of these matters is appropriate.

- [46] Further, and a point that was inadvertently omitted in my previous recommendations, this should also cross-reference to the list in Chapter 3 (now RPS-EIT following adoption of Plan Amendment 3) of the One Plan to “facilities and assets of regional or national importance.”
- [47] I also consider it appropriate as a statement of objective that what this part of the objective is seeking to protect by the management of reverse sensitivity effects, is the operation, maintenance, and upgrade of that infrastructure/assets of national significance. I note that this is implemented further by the Policy (UFD-P4).
- [48] However, by stating the above, I do not mean that reverse sensitivity effects should be ignored in all other cases, such as for Fonterra, but for reasons previously expressed, I consider that a reliably clear definition is required and nationally significant infrastructure is suitable. I consider that reverse sensitivity effects on an industrial activity like the Fonterra Plant and the Braeburn area would still need to be considered as an ‘effect’ requiring management under UFD-O3, and I note that they would also need to be managed specifically, under UFD-P4.
- [49] If the Panel do not agree with my reasoning above regarding the ability to include nationally significant infrastructure in PC3 and prefer instead to refer only to the National Grid, I recommend it be referred to in PC3 as “electricity transmission network” as defined in the NPS-ET.
- [50] As to whether the words “to the extent reasonably possible” (taken from NPS-ET Policy 10) need to be incorporated, my view is that qualifications such as this are better located in the policies of PC3 rather than the objective.
- [51] Regarding the Panel’s question (f)(iv) whether there should be improved clarity in terms of what adverse “effects” are focussed on through UFD-O3, my view is that this should be kept broad at the objective level. I have recommended minor amendments to (e) to note that there should be ‘effective’ management of adverse effects, and made it clearer that these are effects on the ‘environment’, which itself is broadly defined in the RMA. Given

the place of the objective in setting a broad framework for implementation across the region and through policies, I would prefer to avoid greater specificity here that might overwhelm or affect the balance of the objective. However, in light of discussions at the hearing, I have recommended minor amendments to (f) to restructure and refocus the direction.

[52] For the reasons outlined above, I recommend the following amendments to UFD-O3(1)(e) and (f):

**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 the capacity and choice available within housing and business land<sup>9</sup> capacity and housing choice,
  - (c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment<sup>10</sup>,~~
  - (d) are, or planned to be,<sup>11</sup> well connected by a choice of transport modes including *public transport*\*, ~~and~~
  - (e) effectively manage adverse ~~environmental effects\*~~ on the environment, -and
  - (f) manage effects (including reverse sensitivity effects) to ensure~~on~~ the operation, maintenance and upgrade of nationally significant infrastructure\*, including infrastructure and facilities and assets of regional or national importance<sup>12</sup>; to ensure the infrastructure is not compromised-

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<sup>9</sup> Submission point 14.1

<sup>10</sup> Submission point 11.1 and 7.4

<sup>11</sup> Submission point 7.5

<sup>12</sup> Submission point 1.1, FS1.1

**Question (g): Framing of issues – should these be reviewed to amend implicit or explicit policy directions**

- [53] I retain my position from the hearings that the issues should be framed as ‘problems’ faced by the region and should not provide policy direction or solutions.
- [54] I have reviewed the three issues proposed through PC3 and in my view only one issue requires amendment, Issue 3 (UFD-I3). I have revised this issue with the intention of retaining the main threads but expressing it as a genuine issue rather than a statement of objective.
- [55] I have also reworded the section to reflect that these issues can apply outside of the urban environment to smaller towns and settlements, recognising Rangitikei District Council’s submission.
- [56] I recommend UFD-I3 be amended as follows (deletions shown in orange ~~strikethrough~~ and additions in orange underline)

**UFD-I3: Demand for housing, *business land\**, *infrastructure*<sup>^</sup> and *community services\****

~~A growing population increases demand for housing, *business land\**, *infrastructure*<sup>^</sup> and *community services\**. Growth in urban environments<sup>\*13</sup> needs to be provided for in a way that contributes to well-functioning urban environments\*, is integrated with *infrastructure*<sup>^</sup> planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance *nationally significant infrastructure*<sup>\*14</sup>, does not worsen<sup>15</sup> manages effects\* on the urban and natural environment (including freshwater)<sup>16</sup>, and improves resilience to the *effects\** of *climate change*<sup>^</sup>. Growth in smaller towns and communities that are not urban environments\* should also be provided in a manner which contributes to well-~~

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<sup>13</sup> Submission point 12.5

<sup>14</sup> Submission point 4.2, FS1.6, FS2.2, FS3.4

<sup>15</sup> Submission point 5.1

<sup>16</sup> Submission point 5.1

functioning communities that achieve the principles of well-functioning urban environments\*

Growth in urban environments\* that is not well planned and integrated with infrastructure and other required services may result in urban environments\* that are not well-functioning for the community. This can lead to effects on the urban and natural environment including for example, freshwater^, effects on existing infrastructure, and lack of resilience to the effects of climate change. It is important that growth in urban environments\* is provided for in a way that contributes to well-functioning urban environments\*.

These issues can also apply to smaller towns and settlements where it is also important for growth and development to contribute to well-functioning communities.

**Question (h): Additional information about the progress of Territorial Authorities in providing for predicted short, medium and long-term demand**

[57] The table that follows provides information from each Territorial Authority on their progress towards planning and provision for urban development and growth. It is noted that three of the region's seven primary Territorial Authorities do not have any urban environments.

Council	Summary of progress
Ruapehu District Council	<ul style="list-style-type: none"><li>• The Ruapehu District is predominantly rural with smaller urban settlements and does not have any urban environments.</li><li>• Advice from Ruapehu District Council is that the district is not currently in a growth phase and the Council are yet to initiate any form of district plan programme.</li></ul>
Whanganui District Council	<ul style="list-style-type: none"><li>• The Whanganui District includes one urban environment (Whanganui City) and a number of smaller settlements.</li></ul>

Council	Summary of progress
	<ul style="list-style-type: none"> <li>• The district’s projected population in 2023 is 48,950 and is projected to grow to 52,600 residents over the next 10 years. Beyond this, the District is predicted to grow to 54,700 people by 2044 and 56,500 by 2054.</li> <li>• Over this period the District is expected to grow to 21,460 households and require approximately 1160 additional residential units. This growth is anticipated to be a mixture of greenfield (545 residential units), infill developments (517 residential units) and rural (100 residential units).</li> <li>• The <a href="#">Whanganui Housing Strategy</a> was adopted in 2019.</li> <li>• A full review of the District Plan is planned to commence in 2024.</li> </ul>
Rangitikei District Council	<ul style="list-style-type: none"> <li>• The Rangitikei District is predominantly rural with smaller urban settlements and does not have any urban environments.</li> <li>• The district is growing with population predicted to reach over 25,000 people by 2050. This is almost 9,000 more than live in the District today.</li> <li>• Council has prepared and adopted it’s community spatial plan – Pae Tawhiti Rangitikei Beyond <a href="#">Pae-Tawhiti-Rangitikei-Beyond-Spatial-Plan-Web.pdf</a></li> <li>• The Spatial Plan looks at each town and rural settlement across the District, and considers how they might grow. Where towns and settlements are assessed as having a shortfall of “available land” for residential and rural lifestyle development, the spatial plan identifies potential growth areas.</li> <li>• Council has recently commenced a plan change process that focuses on residential and rural lifestyle development and is in the efficiency and effectiveness monitoring</li> </ul>



Council	Summary of progress
	<p>phase. The Plan Change will look to rezone land for greenfield development (where needed and appropriate) and will also look at ways to improve the variety and affordability of living options within existing urban areas.</p>
<p>Manawatū District Council</p>	<ul style="list-style-type: none"> <li>• The Manawatū District has one urban environment (Feilding) and a number of smaller urban settlements.</li> <li>• Current approach to growth is set out in the <a href="#">Feilding Urban Growth Framework Plan, 2013</a>, which is currently under review as Council considers growth options across the district’s villages and rural settlements (Manawatū Growth Strategy).</li> <li>• The Maewea Precinct 4 (residential) Area in Feilding is estimated to provide housing land for the next 15 years of demand (based on a medium(+) scenario).</li> <li>• The growth strategy work will quantify the amount of capacity available within existing urban land (Feilding and villages) for future intensification.</li> <li>• Council have enough capacity for industrial and commercial growth but note the Industrial and Demand assessment is over 10 years old.</li> <li>• Recent reporting includes; the Housing and Demand Assessment (Rongotea South Plan Change), 2023; Business and Residential Market Assessment (Property economics), 2021; Housing Stocktake, 2020; Feilding Residential Growth Update, 2018, and Feilding Framework Plan, 2023.</li> </ul>
<p>Palmerston North City Council</p>	<ul style="list-style-type: none"> <li>• The district’s population is growing and is projected to increase to 117,280 people (23.7% increase) by 2054.</li> </ul>

Council	Summary of progress
	<ul style="list-style-type: none"> <li>• The Council adopted its growth strategy in 2021 <a href="#">Te Mahere Whakatipu Taone, City Growth plan</a></li> <li>• Council completed its <a href="#">Housing and Business Development Capacity Assessment</a> in 2023</li> <li>• Council have prepared a draft Future Development Strategy which is due to be released for consultation on 22 March 2024.</li> <li>• Plan Changes have been progressed as follows: <ul style="list-style-type: none"> <li>- Plan Change E – Roxburgh residential area: pre-consultation undertaken in 2023. Notification planned for 2024.</li> <li>- Plan Change F - Ashhurst Growth Areas: currently in the preparatory phase.</li> <li>- Kākātangiata Urban Growth Area: currently in the preparatory phase</li> <li>- Plan Change G – Aokautere Urban Growth: Hearings held in late 2023.</li> <li>- Plan Change I – Medium Density Residential Zone: due to be notified in 2024.</li> <li>- Te Utanganui Central New Zealand Distribution Hub: currently in the preparatory phase through the development of the Te Utanganui Masterplan <a href="#">Te Utanganui – Central New Zealand Distribution Hub   Palmerston North City Council (pncc.govt.nz)</a>.</li> <li>- A private plan change application has been lodged for a residential zone plan change at 160 Napier Road, but is currently being assessed for completeness before formally accepting the private plan change.</li> </ul> </li> </ul>

Council	Summary of progress
Tararua District Council	<ul style="list-style-type: none"> <li>• The Tararua District is predominantly rural with smaller urban settlements and does not have any urban environments.</li> <li>• Council adopted a draft Urban Growth Strategy for consultation in December 2023. Consultation on the draft strategy commenced on 5 February and closes on 5 March 2024.</li> <li>• The draft Strategy considers growth for the District over the next 30 years, for the four main town centres (Dannevirke, Woodville, Eketāhuna, Pahiatua) and rural villages.</li> <li>• The draft strategy considers commercial and industrial growth in the main town centres and assumes a 1% per annum growth rate (based on the aspirational scenario).</li> <li>• The draft strategy makes rezoning recommendations for land that has been considered to be suitable for either residential, commercial or industrial activities in the future. It also contemplates Māori Multi-Purpose Zone and Papakāinga development.</li> <li>• The Strategy is proposed to be adopted by Council in April.</li> <li>• The final recommendations included in the Strategy will be incorporated into the Proposed District Plan review which is planned to be notified in July 2024.</li> </ul>
Horowhenua District Council	<ul style="list-style-type: none"> <li>• The district is experiencing high population growth and has been doing so for approximately eight years.</li> <li>• This growth is expected to continue for at least the next 20 years.</li> <li>• In response to growth, the Council has undertaken two plan changes. One in 2018 to increase intensification</li> </ul>

Council	Summary of progress
	<p>opportunities (Plan Change 2) and the second to rezone 420ha of land immediately east of Levin for residential and urban development, enabling 3,500 houses (Plan Change 4).</p> <ul style="list-style-type: none"> <li>• Plan Change 4 appeals have recently been resolved via Environment Court mediation and the plan change is set to become operative in March 2024.</li> <li>• Council also has a growth strategy (Horowhenua Growth Strategy 2040) which sets out where and how the District will grow to 2040. The strategy was prepared in 2018 and revised in 2022 in response to factors which included higher than expected growth and detail on the location of the Ōtaki to North Levin expressway. The 10 year growth areas in the Horowhenua Growth Strategy are exempt from the NPS-HPL.</li> <li>• Current work includes understanding the requirements associated with ensuring sufficient infrastructure is in place to enable the district to respond and provide for growth.</li> </ul>

**Question (i): Is UFD-P5 too directive given the competing directions of the NPS-UD to provide development capacity? Should it be softened?**

[58] In my view, UFD-P5 should be softened. My understanding from the territorial authority submitters is that the policy was generally appropriate and there was no issue, per se, with the language of ‘ensuring’ that the policy directives were met, nor was it raised in any evidence from these submitters.

[59] However, I also acknowledge that not all the directives would be able to be met by every individual subdivision development, given that the ‘ensure’

requirement intended as a broad directive to apply to urban environments within each territorial boundary. Accordingly, I consider that the way the policy should be softened is by making it clearer that territorial authorities are to ensure the directives within each urban environment 'overall'. I prefer this to removing the 'must ensure' requirement which I did not understand to be problematic to the territorial authority submitters.

[60] Further to the above, I note a point raised by Palmerston North City Council in their response to this question at the hearing. Mr Aplin-Thane who was presenting on behalf of Palmerston North City Council, expressed concern about UFD-P5(4) and how that would apply under the 'must' directive of UFD-P5. Clause (4) relates to enabling development across multiple or amalgamated properties. In some cases, development may only occur on one property (if for instance, that property was large). I therefore recommend amendments to UFD-P5(4) to address the concern raised by Mr Aplin-Thane at the hearing. Additions are shown in orange underline:

#### **UFD-P5: Built forms**

Territorial Authorities must ensure the<sup>17</sup> ~~The~~ form and design of subdivision, use and development in *urban environments\** is managed so that overall it:

- (1) *contributes to a well-functioning urban environment\**,
- (2) *provides for a range of housing types and densities and employment choices in a manner that integrates with existing and planned development infrastructure\**,
- (3) *recognises the importance of marae and papakāinga and enables their development, ongoing use and protection from incompatible development and reverse sensitivity adverse effects\**, where existing or planned *development infrastructure\** of sufficient capacity is, or can be, provided, and
- (4) enables, where appropriate, development across multiple or amalgamated *properties\** to achieve all of the above.

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<sup>17</sup> Submission point 10.8

**Question (j) Does UFD-P7(2)(b) need to provide greater clarity as to what papakāinga is, and when such a provision would apply to it**

[61] In considering this question, I have sought information from other parties including the territorial authorities, Horizons' Senior Policy Analyst who prepared the section 32 report and notified provisions, Horizons' Senior Policy Advisor (Māori) who was involved when PC3 was developed and assisted with iwi engagement, and a senior advisor from Te Puni Kōkiri whose role involves working with Māori to support whānau with developing papakāinga.

[62] It is my understanding that in preparing the section 32 report and developing the proposed provisions for PC3, Council considered whether PC3 should include a definition for papakāinga. Following discussions on this topic, I understand it was determined that a definition to be applied at a regional level was unlikely to be helpful and quite likely unable to be agreed upon given the diversity of iwi and hapū in the region.

[63] In reflecting on discussions at the hearing and the question posed by the panel, I make the following observations in relation to UFD-P7:

- the policies are quite specific in that the application of UFD-P7(1) and (2) specifically refers to Māori. In my opinion, this discounts this Policy being applied to any other cultural or ethnic group;
- The policies are grounded in Te Tiriti o Waitangi which is the founding document ensuring partnership between Māori and the Crown (of which local government is the representative of).
- UFD-P7 itself does not lend itself to non-Māori because the practice of papakāinga (to my knowledge) is a specifically Māori concept.
- Many iwi and hapū practice papakāinga differently, likely making it difficult to find one uniform answer that is supported across the region.
- A number of territorial authorities have a definition for papakāinga in their District Plans. For those who don't, work is underway with their local iwi

and hapū to address what papakāinga might entail for their district. Of the territorial authorities who spoke at the hearings, my impression was that lack of a definition of papakāinga in the RPS would not create issues at a local level and that the current approach was generally supported.

[64] For the reasons outlined above, I do not consider it necessary to define papakāinga through PC3 and I am comfortable that the level of direction provided through UFD-P7 enables appropriate application of the policy by local authorities.

**Question (k): Should UFD-P7(1) be amended to refer to iwi and hapū expressing their cultural traditions and norms**

[65] In my opinion, no. Policy 1(a)(ii) of the NPS-UD describes a well-functioning urban environment as one that as a minimum:

*“have or enable a variety of homes that:  
(ii) enable Māori to express their cultural traditions and norms”*

[66] While UFD-P7 is primarily giving effect to Policy 9 of the NPS-UD (in providing for iwi and hapū participation in plan development), it also envelops the elements of a well-functioning urban environment as it relates to Māori.

[67] I also note that through pre-notification engagement with iwi, a number of iwi highlighted the importance of PC3 enabling Māori to undertake their cultural practices and norms<sup>18</sup>. In response to this amendments were made to UFD-P7 and Method 2 of PC3 prior to notification.

[68] Given the higher order direction of the NPS-UD in Policy 1(a)(ii) and the engagement outcomes from hui during the section 32 process, I do not recommend amending UFD-P7(1) to refer to iwi and hapū specifically.

[69] To the extent there may be some concerns as to what may constitute Māori expression of cultural traditions and norms and the identity of who is wishing asserting such traditions and norms, my expectation is that territorial

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<sup>18</sup> Refer to section 5.2, pages 18-23 of the [section 32 report](#)

authorities will be well positioned to make judgments on these matters in consultation with hapū and iwi.

**Question (l) UFD-I3: does deletion of “do not worsen” consistent with the NPS-FM**

[70] I refer the Panel to my recommended rephrasing of UFD-I3 outlined in paragraphs 53-56 above. My rephrasing does not carry through the wording “do not worsen” and I agree that it should not be included. I accept that the NPS-FM seeks the maintenance or improvement of water quality.

**Question (m): UFD-I3: should the suggested addition be reframed to express the issues faced by smaller towns and communities more clearly**

[71] In reflecting the discussions from the hearing, I agree that the recommended wording of UFD-I3 would benefit reframing to better describe the issues experienced by smaller towns and communities.

[72] As outlined above in paragraphs 53-56, I recommend rephrasing UFD-I3. As part of this re-phrasing, I recommend a sentence be included at the end of UFD-I3 that relates specifically to smaller towns and settlements.

**Question (n): UFD-P4(1)(b): how can this policy address the risk of development solely providing for residential use, with no provision for business use, while also recognising that it can be impractical to require development to do both e.g. small-scale intensification**

[73] To address this concern, I suggest that the words “provides” be changed to “contributes to”, to be clear that that not every individual development or individual plan enabled area needs to provide for all things at once.

[74] I therefore recommend UFD-P4(1)(b) be amended as follows (deletions shown in orange ~~strikethrough~~ and additions in orange underline):

**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~~ contributes to a range of residential and business<sup>19</sup> areas that enable different housing and/or business types, *site*\* size and densities that relate well to the surrounding environment<sup>20</sup>,
  - (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 enables provision of<sup>21</sup> *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;~~;~~  
~~and~~
  - (f) the operation, maintenance and upgrade of nationally significant infrastructure\* is not compromised<sup>22</sup>, and
  - (g) it promotes positive effects, and avoids, remedies, or mitigates the adverse effects^ (including cumulative effects) of urban development on the health and well-being of water bodies^, freshwater^ ecosystems, and receiving environments\*.

**Question (o) UFD-P4(2)(c): should more clarity be provided on how connections for transport modes and to transport corridors are provided for**

[75] As outlined in my Section 42A evidence<sup>23</sup> and rebuttal evidence, reliance on the NPS-UD definition for ‘planned’ public transport has the potential to affect urban development proposals. Given the lack of control district plans and councils have on planning and delivery of public transport, changes were recommended to UFD-O3 and UFD-P4 to provide for this scenario. However in reflecting on discussions at hearings and having considered the UFD-P4(2)(c) in greater detail, I am concerned that the inclusion of the words ‘*can be*’ in clause (2)(c) also applies to transport corridors, which is considered development infrastructure by the NPS-UD. I consider my rebuttal version of UFD-(2)(c) to therefore be more permissive than was intended, as the planning

<sup>19</sup> Submission point 14.2

<sup>20</sup> Submission point 11.5 and 7.4

<sup>21</sup> Submission points 7.5, 10.6, 12.9

<sup>22</sup> Submission point 1.2

<sup>23</sup> Refer to paragraphs 93,166,167 and 173

of development infrastructure (such as transport corridors) is largely within the control of territorial authorities.

[76] In considering the Panel’s question regarding the need for this policy to provide more clarity, I have suggested the following amendments to UFD-P4(2)(c). I consider removing the words “or can be” is appropriate even though I accept the views that not every development area (particularly an expansion) will be ‘well connected’ at the time that it is proposed. In my view, phrased this way, it would require that a development proposal (or plan change to provide for expansion) addresses this item with a degree of certainty that is acceptable to the decision makers in the case, and it may also support conditions or plan provisions to ensure that this matter is provided for.

[77] For the reasons above, I recommend the following amendments to UFD-P4(2)(c) - (deletions shown in orange ~~strikethrough~~ and additions in orange underline):

**UFD-P4: Urban intensification and expansion**

(1)...

(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, or can be, well-connected along by a variety of transport modes~~  
and<sup>24</sup> transport corridors
- (c) is well-connected:
  - i. by a variety of transport modes, with demonstration of how provision of public transport will be enabled, and
  - ii. along transport corridors.

**Question (p): UFD-P8(1)(c): should direction be provided as to what level of resilience is required to the effects of climate change**

[78] Resilience to climate change is a topic that all regions will be dealing with and to my knowledge there is no widely agreed upon definition as to what level of resilience is required through the NPS-UD. In my initial section 42A report

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<sup>24</sup> Submission point 2.9

when considering whether to remove the term ‘best practice’ from UFD-P8(1)(c), my conclusions were that in the absence of further guidance or a definition of what is encompassed by best practice resilience, this policy creates uncertainty for users. I also stated the view that the word ‘resilience’ on its own sufficiently conveys that development of urban environments would need to have the capacity to withstand the impacts of climate change as addressed by this policy and required by the NPS-UD.

[79] The intention of Policy UFD-P8(1) is to ensure development of urban environments occurs in a way that reduces the risks to those environments from climate change. What is an appropriate level of resilience improvements should be at the discretion of the local authority and may vary depending on the urban environment and its constraints.

[80] In considering this further, I have analysed the provisions of Chapter 9 (now RPS-HAZ under Plan Amendment 3) of the RPS which addressed natural hazards. The sole objective of Chapter 9 seeks to ensure the adverse effects of natural hazards on people, property, infrastructure and the wellbeing of communities is avoided or mitigated. Policy 9-1 (now HAZ-NH-P9 under Plan Amendment 3) outlines the responsibilities of regional council and territorial authorities for hazard management. Policy 9-2 (now HAZ-NH-P10 under Plan Amendment 3) guides development in areas prone to flooding. This policy contains measures requiring flood hazard avoidance or mitigation of the 0.5% AEP (1 in 200 year) flood hazard. The policy also states that flood hazard avoidance must be preferred to flood hazard mitigation.

[81] In my view, these provisions provide some direction on the level of protection required for development, which will assist with ensuring resilience to the effects of climate change.

[82] I have also researched what other regions have done in relation to defining resilience. Greater Wellington Regional Council through the submissions and hearing process for the urban development stream on Plan Change 1, have proposed a definition for resilience for inclusion in the RPS (currently still going

through the hearings process for other topics). Their proposed definition reads as follows:

***Climate-resilience/Climate-resilient/Resilience and Resilient*** (in relation to climate change or natural hazards) –

*The capacity and ability of natural and physical resources, including people, communities, businesses, infrastructure, and ecosystems, to withstand the impacts and recover from the effects of climate change, including natural hazard events.*

[83] In my opinion, in the absence of more technical evidence (specific climate resilience and PC3) and national direction on resilience, I consider the proposed wording of UFD-P8 to be appropriate in its current form. This policy in combination with the provisions of Chapter 9 (now RPS-HAZ) provide sufficient guidance for development in urban environments, while also aligning with the NPS-UD. I therefore do not recommend any changes to UFD-P8.

**Question (q): Method 2: should the words “through the LTP” be deleted from the penultimate line**

[84] Yes, my position stated at the hearing remains. The intent of the recommended amendments to Method 2 is to identify that urban development should generally be planned through the Long-term Plan processes, while still acknowledging that in some cases funding may be sought through other means.

[85] I recommend removing the words “through the LTP” from the penultimate line of the sixth paragraph of Method 2, along with some minor restructuring of that final sentence and a minor deletion in the first line to improve readability as follows (deletions shown in orange ~~striketrough~~ and additions in orange underline)

### **Method 2 – Strategic Planning**

.....

Councils will generally plan and fund ~~for~~ future urban development through their Infrastructure Strategies and Long-term Plans (LTPs). In most cases, facilitating urban development is best done by planning and funding lead infrastructure through the LTP processes, however where necessary or appropriate Councils may seek alternative funding sources outside the LTP. Ultimately, if Councils do not plan for residential growth ~~through the LTP this can be the result can be in~~ unplanned or constrained residential growth.

**Question (r): AER: should these be amended to provide a link to UFD-P7**

[86] As noted by the Panel, the Anticipated Environmental Results (AERs) do not provide a link to UFD-P7. I believe this may have been an oversight in the drafting phase of PC3. There indeed should be a link within the AERs to UFD-P7. I have reviewed the AERs included in PC3 and recommend changes be made to UFD-AER1 and UFD-AER3<sup>25</sup> as follows:

Anticipated Environmental Result	Link to Policy	Indicator	Data Source
<b>UFD-AER1:</b> Urban growth occurs in a strategically planned manner.	UFD-P1, <del>UFD-P7</del>	<ul style="list-style-type: none"> <li>Urban growth</li> <li><u>Land use strategies</u></li> <li><u>Iwi and hapū involvement in development planning processes</u></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>A</sup> variations and changes</li> </ul>
<b>UFD-AER2:</b> <u>Highly productive land</u> <sup>26</sup> <u>is Class 1 and II versatile soils are retained, where appropriate for productive use.</u>	UFD-P3	<ul style="list-style-type: none"> <li>Urban growth and rural residential <i>subdivision</i>*</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>A</sup> variations and changes</li> </ul>
<b>UFD-AER3:</b> Urban intensification is achieved.	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6, <u>UFD-P7</u>	<ul style="list-style-type: none"> <li>Urban intensification</li> <li><i>Housing bottom lines</i><sup>*</sup> achieved</li> <li><u>Land use strategies</u></li> <li><u>Iwi and hapū involvement in development planning processes</u></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>A</sup> variations and changes</li> <li>NPS UD monitoring requirements</li> </ul>

<sup>25</sup> Scope provided by Rangitikei District Council submission point 12.20 – consequential amendments to AERs following amendments to provisions.

<sup>26</sup> Submission points 7.7, 10.2, 12.20

Anticipated Environmental Result	Link to Policy	Indicator	Data Source
<b>UFD-AER4:</b> <i>Development infrastructure*</i> is in place in time to facilitate urban intensification or expansion	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	<ul style="list-style-type: none"> <li>Urban intensification and growth</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>
<b>UFD-AER5:</b> New developments maximise energy and transport efficiency.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> <li>Solar energy provisions in <i>district plans</i><sup>^</sup></li> <li>Increases in <i>active transport*</i> and <i>public transport*</i>;</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> <li>Regional Land Transport Plan indicator monitoring</li> <li>Census: main means of travel</li> </ul>
<b>UFD-AER6:</b> Risks due to the impacts of <i>climate change</i> <sup>^</sup> are minimal to new developments.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> <li>Urban intensification and growth</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>

## C. OTHER MATTERS

### Plan Amendment 3 to the One Plan

[87] Plan Amendment 3 to the One Plan (PA3) gives effect to the National Planning Standards and was amended on 27 February 2024.

[88] Given PA3 will be in effect at the time the Panel will be preparing their decision on PC3, the following consequential amendments will need to be made to the One Plan:

- Update of the National Policy Statements and New Zealand Coastal Policy Statement table (copied below) to identify that the One Plan has been reviewed to give effect to the NPS-UD within the Chapter titled: National policy statements and New Zealand Coastal Policy Statement.
- Include the abbreviations for the National Policy Statement on Urban Development and National Policy Statement for Highly Productive Land in the Abbreviations chapter of the One Plan.

<b>National Policy Statements and New Zealand Coastal Policy Statement</b>	
National Policy Statements (NPSs) and the New Zealand Coastal Policy Statement (NZCPS) form part of the Resource Management Act's policy framework and are prepared by central government. NPSs and the NZCPS contain objectives, policies and methods that must be given effect to by policy statements and plans. NPSs and the NZCPS must also be given regard to by consent authorities when making decisions on resource consent applications, alongside other considerations.	
The following table provides an overview of whether any relevant review/s of the One Plan has been undertaken in relation to NPSs and the NZCPS.	
<a href="#">National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023</a>	The One Plan has not yet been reviewed
<a href="#">National Policy Statement for Indigenous Biodiversity 2023</a>	The One Plan has not yet been reviewed
<a href="#">National Policy Statement for Highly Productive Land 2022</a>	The One Plan has not yet been reviewed
<a href="#">National Policy Statement for Freshwater Management 2020</a>	The One Plan has not yet been reviewed
<a href="#">National Policy Statement on Urban Development 2020</a>	The One Plan has not yet been reviewed
<a href="#">National Policy Statement for Renewable Electricity Generation 2011</a>	The One Plan has not yet been reviewed
<a href="#">New Zealand Coastal Policy Statement 2010</a>	The One Plan has not yet been reviewed
<a href="#">National Policy Statement on Electricity Transmission 2008</a>	The One Plan has not yet been reviewed

### **Incorrect labelling of effects and reverse sensitivity effects**

[89] I note that there are instances of the term 'effects' and 'reverse sensitivity effects' demarcated by an asterisk (\*) indicating that is term defined by PC3. I note that neither of these terms are defined by PC3 (or the RMA) and therefore do not need an indicator of this nature. All asterisks associated with these terms should be removed from the provisions and I have shown this with orange strikethrough in the attached provisions.

### **UFD-P7 numbering**

[90] As outlined at the hearing UFD-P7(2) mistakenly has two (c) clauses. This is an error that has carried over from notification. I recommend UFD-P7(2) be updated as follows:

- (2) *Land\** use strategies must be proactively developed and implemented to manage urban development in a manner which:
- (a) has regard to resource management issues of concern to *hapū\** and *iwi\**, including those identified in any relevant *iwi management plan\**,

- (b) enables papakāinga housing and marae ~~on Māori-owned land~~<sup>27</sup>,
- (c) enables early and ongoing engagement with iwi and hapū over urban intensification and expansion,
- (~~e~~d) ensures *urban environments*\* enable Māori to express their cultural traditions and norms, and
- (~~e~~e) identifies and protects culturally significant areas.

**D. SECTION 32AA**

[91] The Act requires that changes to PC3 following the preparation of the initial s 32 report must be subject to a further evaluation in similar terms, at a level of detail that corresponds to the scale and significance of the changes.

[92] A s32AA evaluation was undertaken on the primary changes recommended through my section 42A report.

[93] The section 32AA evaluation below covers the key changes recommended through Council’s reply:

- Amendments to create alignment with the NPS-FM
- Amendments to UFD-I3
- Amendments to UFD-P4 to provide clarification on how connections to transport modes and corridors should be provided for
- Amendments to UFD-P5 to soften the approach
- Amendments to the AERs to provide a link to UFD-P7

Alignment with the NPS-FM	
Option 1: no change to s42A and rebuttal evidence provisions	Option 2: incorporate changes
<u>Efficiency &amp; effectiveness</u> The provisions proposed through rebuttal evidence did not consider whether	<u>Efficiency &amp; effectiveness</u> The proposed amendment to UFD-P4 is a small intervention designed to connect PC3

<sup>27</sup> Submission points 7.11, 10.10, 12.13, 17.5



<p>alignment in relation to urban development with the NPS-FM is required. Recognising the relationship between urban intensification and development with freshwater quality has some merit and could serve to acknowledge and reinforce the NPS-FM direction to territorial authorities.</p> <p><u>Risk of acting or not acting</u></p> <p>The risk of not acting would be misalignment with the direction of the NPS-FM for urban development and expansion.</p> <p><u>Appropriateness</u></p> <p>Under this scenario, UFD-P4 would not recognise the relationship between urban intensification and expansion and the NPS-FM direction.</p>	<p>with the direction of the NPS-FM (specifically in relation to the requirements of territorial authorities under Clause 3.5(4) of the NPS-FM). In my view this minor intervention is an effective way to achieve that connection with the direction of the NPS-FM without demanding a more detailed consideration (which will be undertaken through the Oranga Wai process).</p> <p><u>Risk of acting or not acting</u></p> <p>The risk of acting is that the provision conflicts with the NPS-FM or other provisions of the One Plan associated with water quality. I am satisfied that the minor amendment proposed to UFD-P4 will not create misalignment with the NPS-FM or other chapters of the One Plan.</p> <p><u>Appropriateness</u></p> <p>I consider the proposed amendment to UFD-P4 to be the most appropriate way to align with the direction of the NPS-FM within the scope available and without compromising other chapters of the One Plan.</p>
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<b>Amendments to UFD-I3</b>	
<b>Option 1: no change to s42A and rebuttal evidence provisions</b>	<b>Option 2: incorporate changes</b>
<p><u>Efficiency &amp; effectiveness</u></p> <p>The wording of UFD-I3 is not effective as it describes an outcome.</p> <p><u>Risk of acting or not acting</u></p> <p>Not acting would result in an issue that pre-empts an outcome rather than creating</p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>Proposed amendments to UFD-I3 reframe the issue using language consistent with an issue rather than an outcome. This is a more effective way to describe an issue than as an outcome.</p>

<b>Amendments to UFD-I3</b>	
<b>Option 1: no change to s42A and rebuttal evidence provisions</b>	<b>Option 2: incorporate changes</b>
<p>the hierarchy for objectives and then policies.</p> <p><u>Appropriateness</u></p> <p>It is not appropriate for issues to be framed as outcomes.</p>	<p><u>Risk of acting or not acting</u></p> <p>By acting the issue will read as an issue that describes the problem for the region.</p> <p><u>Appropriateness</u></p> <p>In my view reframing UFD-I3 is appropriate.</p>

<b>Amendments to UFD-P4(2)(c) to provide clarification on how connections to transport modes and corridors should be provided for</b>	
<b>Option 1: no change to s42A and rebuttal evidence provisions</b>	<b>Option 2: incorporate changes</b>
<p><u>Efficiency &amp; effectiveness</u></p> <p>In general the wording is satisfactory, however does create some uncertainty around timing and expectations of how public transport will be provided for.</p> <p><u>Risk of acting or not acting</u></p> <p>Not acting would result in a policy that could be incorrectly applied, or urban development occurring without enabling public transport or connections to other transport corridors.</p> <p><u>Appropriateness</u></p> <p>It is not the intention of PC3 to be more permissive than the NPS-UD which outlines the requirements associated with provision of public transport as part of urban development. Retaining the existing wording is at risk of being interpreted in a</p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The proposed amendments to UFD-P4(2)(c) more clearly outline the policy requirements associated with enabling public transport and being well-connected to transport corridors. In my opinion, this is a more effective way of framing the policy.</p> <p><u>Risk of acting or not acting</u></p> <p>By acting the Policy is more likely to be interpreted and applied correctly.</p> <p><u>Appropriateness</u></p> <p>In my view rewording UFD-P4(2)(c) is appropriate.</p>

Amendments to UFD-P4(2)(c) to provide clarification on how connections to transport modes and corridors should be provided for	
<b>Option 1: no change to s42A and rebuttal evidence provisions</b>	<b>Option 2: incorporate changes</b>
way that is more permissive than the NPS-UD and intention of PC3.	

Amendments to UFD-P5 to soften the approach	
<b>Option 1: no change to s42A and rebuttal evidence provisions</b>	<b>Option 2: incorporate changes</b>
<p><u>Efficiency &amp; effectiveness</u></p> <p>In general the wording is satisfactory, however is directive in nature with the word “must ensure” included. However there is a risk that not every subdivision development would be able to be meet the directive of the Policy as proposed through rebuttal evidence. This would affect the effectiveness of the policy.</p> <p><u>Risk of acting or not acting</u></p> <p>Not acting would result in a policy that could be incorrectly applied, or unable to be applied to some urban developments.</p> <p><u>Appropriateness</u></p> <p>In its current form, the policy is potentially not the most appropriate way to guide urban development and provide for the direction of the NPS-UD.</p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The proposed amendments UFD-P5 provide better clarity on how the ‘ensure’ requirement is intended as a broad directive to apply to urban environments within each territorial boundary. The proposed way the policy should be softened is by making it clearer that territorial authorities are to ensure the directives within each urban environment ‘overall’.</p> <p><u>Risk of acting or not acting</u></p> <p>By acting the Policy is more likely to be interpreted and applied correctly.</p> <p><u>Appropriateness</u></p> <p>In my view rewording UFD-P5 is appropriate.</p>

Amendments to UFD-AER1 and UFD-AER3 to provide a link to UFD-P7	
Option 1: no change to s42A and rebuttal evidence provisions	Option 2: incorporate changes
<p><u>Efficiency &amp; effectiveness</u></p> <p>In general every provision should be associated with an Anticipated Environmental Result (AER) to enable monitoring of performance. The rebuttal version of the provisions does not create this link and is therefore not effective.</p> <p><u>Risk of acting or not acting</u></p> <p>Not acting would result in a policy did not have an AER link.</p> <p><u>Appropriateness</u></p> <p>In the current form, the AERs do not provide a mechanism for monitoring the effectiveness of UFD-P7.</p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The proposed amendments UFD-AER1 and UFD-AER2 enable a complete policy flow for UFD-P7. This is the most effective way to create a pathway to measure whether the outcomes of UFD-P7 are achieved.</p> <p><u>Risk of acting or not acting</u></p> <p>Acting will ensure the policy flow is complete and there are AERs and indicators which link to UFD-P7.</p> <p><u>Appropriateness</u></p> <p>In my view including a link to UFD-P7 in UFD-AER1 and UFD-AER3 is appropriate.</p>

Leana Shirley

**DATED: 8 MARCH 2024**



# **Urban Development Plan Change**

**S42A Redrafted provisions based on submitter expert evidence**

**Base document = Redrafted provisions based on submissions and pre-hearing agreements – December 2023**

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## RPS – UFD – Urban form and development Te tāone me te whakawhanaketanga

### Scope and Background

This chapter provides guidance on managing urban growth and development in a manner that ensures there is *sufficient development capacity\** and supply of *land\** in relation to housing and *business land\** to meet the expected demands of the Region, supported by integrated planning of *land\** use, *infrastructure*<sup>^</sup> and development. ~~deals with how activities involving urban development and versatile soils will be addressed.~~ In general, this chapter provides broad policy guidance for managing these activities. Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that integrates with its surrounding environment, when having regard to matters including, but not limited to, energy, *infrastructure*<sup>^</sup>, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values; and resource management issues of significance to *hapū\** and *iwi\**.

#### Urban development and the National Policy Statement on Urban Development 2020

The National Policy Statement on Urban Development 2020 (NPS UD) sets out objectives and policies for the provision of *sufficient development capacity\** to meet the expected demand for housing and *business land\** and to contribute to *well-functioning urban environments\**. Feilding, Palmerston North, Levin and Whanganui are the *urban environments\** in the Horizons Region. The NPS UD also requires local authorities to take into account the principles of the *Treaty of Waitangi (Te Tiriti o Waitangi)*<sup>^</sup> in planning decisions relating to *urban environments\**.

In addition to the urban environments listed above, the Horizons Region is characterised by a number of smaller settlements that are not considered ‘urban environments\*’ in the context of the NPS UD and as defined by this Plan. Development of these settlements should occur in the spirit of the NPS UD and the provisions of this chapter but are not subject to the direction applying to urban environments\*.<sup>1</sup>

#### Urban growth and rural residential *subdivision\** on highly productive land\* versatile soils<sup>2</sup>

Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto highly productive land\*~~the more versatile soils~~ almost always

<sup>1</sup> Submission points 7.1, 10.11, 12.2, 12.5, FS3.15, FS3.17

<sup>2</sup> Submission points 7.7, 10.2, 12.1, 12.6

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~~may result in a reduction of~~ reduces<sup>3</sup> options for their future productive use. Such reduction in options ~~This may~~ adversely affect~~s~~ the ability of future generations to meet their reasonably foreseeable needs.

## Issues

### UFD-I1: ~~The strategic integration of infrastructure with~~ **Strategic planning and land\*** use

~~Urban growth that is not strategically~~ Poorly planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, development infrastructure\* and ~~associated~~ additional infrastructure\*. It can also have the potential to create reverse sensitivity effects<sup>4</sup>. 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.

### UFD-I2: **Adverse effects\*** from urban growth and rural residential subdivision\* on versatile soils-highly productive land\*<sup>5</sup>

Urban growth and rural residential subdivision\* (“lifestyle blocks”), on highly productive land\* ~~versatile soils may almost always~~ results in a reduction of the productive capacity of that land<sup>6</sup> ~~these 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~~.

### 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 in urban environments\*<sup>7</sup> needs to be provided for in a way that contributes to well-functioning urban environments\*, is integrated with infrastructure^ planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance nationally significant infrastructure\*<sup>8</sup>, does not worsen<sup>9</sup> manages effects\* on the urban and natural environment (including freshwater)<sup>10</sup>, and improves resilience to the effects\* of climate change^.~~ Growth in smaller towns and communities that are not urban environments\* should also be provided in a manner which contributes to

<sup>3</sup> Submission point 13.1

<sup>4</sup> Submission point 4.1, FS1.5, FS2.1, FS3.3

<sup>5</sup> Submission points 7.7, 10.2, 12.4, 12.6

<sup>6</sup> Submission point 13.2

<sup>7</sup> Submission point 12.5

<sup>8</sup> Submission point 4.2, FS1.6, FS2.2, FS3.4

<sup>9</sup> Submission point 5.1

<sup>10</sup> Submission point 5.1

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~~well-functioning communities that achieve the principles of well-functioning urban environments\*.~~

Growth in urban environments\* that is not well planned and integrated with infrastructure and other required services may result in urban environments\* that are not well-functioning for the community. This can lead to effects on the urban and natural environment including for example, freshwater<sup>^</sup>, effects on existing infrastructure, and lack of resilience to the effects of climate change. It is important that growth in urban environments\* is provided for in a way that contributes to well-functioning urban environments\*.

These issues can also apply to smaller towns and settlements where it is also important for growth and development to contribute to well-functioning communities.

## Objectives

**UFD-O1: ~~The strategic integration of infrastructure<sup>^</sup> with land<sup>^</sup> use~~ Strategic planning and urban development**

~~Strategic planning for urban development ensures that occurs in a strategically planned manner which allows for the adequate and timely supply of land<sup>^</sup> and associated infrastructure<sup>^</sup>:~~

- ~~(1) sufficient development capacity\* and land supply for housing and business uses is provided to support growth,~~
- ~~(2) new development, development infrastructure\* and additional infrastructure\* are provided in a coordinated, integrated and efficient manner,~~
- ~~(3) the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and~~
- ~~(4) competitive land and development markets are supported in ways which improve housing affordability.~~

**UFD-O1: He mahere rautaki me te whanake ā-tāone<sup>11</sup>**

Mā te mahere rautaki me te whakawhanake tāone:

<sup>11</sup> Te reo translations have not been updated for this version. They will be for the provided post-hearing version.



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(1) ka whakawātea he whenua me te āhei kia whakawhanakehia\* mō te noho tangata me te pakihi hei tautoko whakatipu,

(2) ka whakaratohia he whakawhanake hou, tūāhanga whakawhanake me te tāpiri tūāhanga kia pai te ruruku, me te kōmitimiti,

(3) ka aro atu ki ngā hiahia kanorau o te tangata, o ngā hāpori me ngā whakatipuranga e heke mai nei mā te kōunga me te whakapūmau o teāhua o te tāone, ā

(4) ka tautoko i te makete hoko whenua, whakawhanake hoki kia taea te hoko whare.

**UFD-O2: Urban growth and rural residential *subdivision*\* on versatile soils highly productive land\*<sup>12</sup>**

To ensure that *Territorial Authorities*\* consider the benefits of retaining highly productive land\* Class I and II<sup>13</sup> ~~versatile soils~~<sup>14</sup> for use as *production land*\* when providing for urban growth and rural residential *subdivision*\*.

**UFD-O2: Māori translation to be updated**

**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 the capacity and choice available within housing and business land<sup>15</sup> ~~capacity and housing choice~~,
  - (c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment~~<sup>16</sup>,
  - (d) are, or planned to be,<sup>17</sup> well connected by a choice of transport modes including *public transport*\*, ~~and~~

<sup>12</sup> Submission points 7.7, 10.2, 14.4, 19.1

<sup>13</sup> As identified in the Land Use Capability Classification system.

<sup>14</sup> ~~For general information purposes these soils largely comprise the following soil series: Egmont, Kiwitea, Westmere, Manawatu, Karapoti, Dannevirke, Ohakune, Kairanga, Opiki and Te Arakura.~~

<sup>15</sup> Submission point 14.1

<sup>16</sup> Submission point 11.1 and 7.4

<sup>17</sup> Submission point 7.5

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(e) effectively manage adverse environmental—effects\* on the environment, and

(f) manage effects (including reverse sensitivity effects) to ensure on the operation, maintenance and upgrade of nationally significant infrastructure\*, including infrastructure and facilities and assets of regional or national importance<sup>18</sup>, to ensure the infrastructure is not compromised.

(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~~<sup>19</sup>

(b) it is able to be, or is,<sup>20</sup> well-serviced by existing or planned *public transport\* and active transport\**<sup>21</sup>, ~~or~~

(c) there is a high demand for housing or *business land\**, relative to other areas within that *urban environment\**.

#### UFD-O3: Te āhua me te heinga o te tāone<sup>22</sup>

To be updated

#### UFD-O4: Urban development and the Treaty of Waitangi (Te Tiriti o Waitangi)^

*Planning decisions\* regarding relating to*<sup>23</sup> *urban environments\** take into account the principles of the<sup>24</sup> *Treaty of Waitangi (Te Tiriti o Waitangi)^ principles.*

#### UFD-O4: Te Whakawhanaketanga tāone me Te Tiriti o Waitangi<sup>25</sup>

To be updated

#### UFD-O5: Urban development and climate change^

<sup>18</sup> Submission point 1.1, FS1.1

<sup>19</sup> Submission points 7.12, 10.1, 12.7

<sup>20</sup> Submission point 7.5

<sup>21</sup> Submission point 19.2

<sup>22</sup> Te reo translations have not been updated for this version. They will be for the provided post-hearing version

<sup>23</sup> Submission points 7.12, 10.1, 12.7

<sup>24</sup> Submission points 7.12, 10.1, 12.7

<sup>25</sup> Te reo translations have not been updated for this version. They will be for the provided post-hearing version

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*Urban environments\** are resilient to the *effects\** of *climate change*<sup>^</sup> and support reductions in *greenhouse gas*<sup>^</sup> emissions.

### UFD-O5: Whanake Tāone me te āhuarangi hurihuri

E manawaroa ana ngā taiao tāone ki ngā pānga o te āhuarangi hurihuri me te tautoko kia iti haere i ngā whakahā haurehu kati mahana.

## Policies

### UFD-P1: ~~The strategic~~ Integration of *infrastructure*<sup>^</sup> with *land*<sup>^</sup> use

*Territorial Authorities\** must proactively develop and implement appropriate *land*<sup>^</sup> use strategies to manage urban growth and ~~they should aligns their~~ *infrastructure*<sup>^</sup> asset management planning with those strategies, to ensure the efficient and effective provision of associated *infrastructure*<sup>^</sup> that:

- (1) for urban environments<sup>\*26</sup>, demonstrate how *sufficient development capacity\** for housing and *business land\** will be provided in the *short term\**, *medium term\** and *long term\** in a well-planned and integrated manner, and
- (2) for all settlements,<sup>27</sup> ensure there is co-ordination between the location, form and timing of urban growth-development<sup>28</sup> and the planning<sup>29</sup>, funding, delivery and implementation of *development infrastructure\**.

### UFD-P2: Providing *sufficient development capacity\**

*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*<sup>^</sup> in accordance with UFD-P1, UFD-P4, and UFD-P5,
- (2) *local authorities*<sup>^</sup> 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

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<sup>26</sup> Submission point 7.12, 10.1, 12.7

<sup>27</sup> Submission point 7.12, 10.1. 12.7

<sup>28</sup> Submission point 10.3

<sup>29</sup> Submission point 11.3

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(3) ensuring the urban intensification and expansion necessary to meet the *housing bottom lines*\* specified in Table X<sup>30</sup> is provided for in the Palmerston North District Plan.

Table X *Housing bottom lines*\* for Palmerston North, 2021-2051

<b><i>Housing bottom lines</i>* (number of dwellings)</b>	
Short- to medium-term July 2021 – June 2031 Includes an additional margin of 20%	Long-term July 2031 – June 2051 Includes an additional margin of 15%
5,046 <sup>34</sup>	7,925

**UFD-P3: Urban growth and rural residential *subdivision*\* on highly productive land<sup>32</sup> ~~versatile soils~~**

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 highly productive land\* ~~Class I and II versatile soils~~ for use as *production land*<sup>^</sup> in their assessment of how best to achieve sustainable management.

**UFD-P4: Urban intensification and expansion**

- (1) Intensification and expansion of *urban environments*\* is provided for and enabled in *district plans*<sup>^</sup> where:
- (a) it contributes to a *well-functioning urban environment*\*,
  - (b) it ~~provides for~~ contributes to a range of residential and business<sup>33</sup> areas that enable different housing and/or business types, *site*\* size and densities ~~that relate well to the surrounding environment~~<sup>34</sup>,
  - (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 enables provision of<sup>35</sup> *public transport*\*, and *additional infrastructure*\* required to service the *development capacity*\* is likely to be achieved, ~~and~~

<sup>30</sup> UFD-P2(3) inserted ~~xx Month 2024~~ as directed by clause 3.6 of the National Policy Statement on Urban Development 2020. *Housing bottom lines*\* established in the Palmerston North Housing Capacity Assessment Report - June 2021, adopted by Palmerston North City Council on 30 June 2021. *Housing bottom lines*\* will be updated every three years.

<sup>31</sup> Submission point 11.4

<sup>32</sup> Submission point 19.4, 14.5, 13.5, 12.6, 10.2, 7.7

<sup>33</sup> Submission point 14.2

<sup>34</sup> Submission point 11.5 and 7.4

<sup>35</sup> Submission points 7.5, 10.6, 12.9

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(e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character~~;~~, ~~and~~

(f) the operation, maintenance and upgrade of nationally significant infrastructure\* is not compromised<sup>36</sup>, and;

(g) it promotes positive effects, and avoids, remedies, or mitigates the adverse effects (including cumulative effects) of urban development on the health and well-being of water bodies<sup>^</sup>, freshwater<sup>^</sup> ecosystems, and receiving environments\*.

(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, or can be, well-connected along by a variety of transport modes and<sup>37</sup> transport corridors;~~

(c) is well-connected:

i. by a variety of transport modes, with demonstration of how provision of public transport will be enabled, and

ii. along transport corridors.

(d) manages adverse reverse sensitivity *effects\** on land with existing incompatible activities, including<sup>38</sup> adjacent to the *urban environment\** boundary~~;~~, ~~and~~

(e) does not compromise the operation, maintenance and upgrade of nationally significant infrastructure<sup>\*39</sup>.

(3) *District plans<sup>^</sup>* applying to *urban environments\** must enable heights and density of urban form which are equal to commensurate with<sup>40</sup> the greater of:

(a) demonstrated relative<sup>41</sup> demand for housing and/or business use in that location<sup>42</sup>, or

(b) the level of accessibility provided by existing or *planned\** *active transport\** or *public transport\** to areas with *community services\** and employment opportunities.

(4) Local authority transport plans and strategies must establish ways to contribute to *well-functioning urban environments\** through the provision

<sup>36</sup> Submission point 1.2

<sup>37</sup> Submission point 2.9

<sup>38</sup> Submission point 4.9

<sup>39</sup> Submission point 1.3, FS1.2

<sup>40</sup> Submission points 7.12, 10.1, 12.7

<sup>41</sup> Submission points 7.12, 10.1, 12.7

<sup>42</sup> Submission points 7.12, 10.1, 12.7

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of *public transport\** services and by enabling *active transport\**, including its associated infrastructure<sup>43</sup>.

### UFD-P5: Built forms

Territorial Authorities must ensure the<sup>44</sup> ~~The~~ form and design of subdivision, use and development in *urban environments\** is managed so that overall it:

- (1) contributes to a *well-functioning urban environment\**,
- (2) provides for a range of housing types and densities and employment choices in a manner that integrates with existing and planned *development infrastructure\**,
- (3) recognises the importance of marae and papakāinga and enables their development, ongoing use and protection from incompatible development and reverse sensitivity adverse *effects\**, where existing or planned *development infrastructure\** of sufficient capacity is, or can be, provided, and
- (4) enables, where appropriate, development across multiple or amalgamated *properties\** to achieve all of the above.

### UFD-P6: Significant ~~development capacity\*~~ criteria for evaluating unanticipated or out of sequence development<sup>45</sup>

- (1) Unanticipated or out of sequence development will add significantly to *development capacity\** where:
  - (a) the location, design and layout of the development will contribute to a *well-functioning urban environment\**,
  - (b) the development is well-connected along by a variety of transport modes and<sup>46</sup> transport corridors, and to *community services\**, and open space,
  - (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

<sup>43</sup> Submission point 2.10, FS3.1

<sup>44</sup> Submission point 10.8

<sup>45</sup> Submission points 7.12, 10.1, 10.12, 12.7

<sup>46</sup> Submission points 2.12, 6.6, FS3.2 and 3.8

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- housing bottom lines*<sup>\*</sup>, or specific housing and price needs in the market,
- (d) the development will be realised in the *short term*<sup>\*</sup> and before anticipated planned urban development,
  - (e) there is adequate existing or planned upgrades to<sup>47</sup> upgraded development infrastructure<sup>\*</sup> to support development of the *land*<sup>\*</sup> without adverse *effects*<sup>\*</sup> on the provision or capacity of other planned *development infrastructure*<sup>\*</sup> including planned *infrastructure*<sup>\*</sup> expenditure, and
  - (f) the development avoids adverse *effects*<sup>\*</sup> on *infrastructure*<sup>^</sup> and other physical resources of regional or national importance ~~as far as reasonably practicable~~<sup>48</sup>.
- (2) If the above criteria are met, the Regional Council and *Territorial Authorities*<sup>\*</sup> must have particular regard to the contribution the development will have towards achieving UFD-P2.

#### UFD-P7: Hapū and iwi involvement in urban development

- (1) Local authorities, in taking account of the principles of Te Tiriti o Waitangi (Treaty of Waitangi) in relation to urban environments, must Ensure ~~planning decisions~~<sup>\*</sup> involving ~~urban environments~~<sup>\*</sup> provide for ~~Treaty of Waitangi (Te Tiriti o Waitangi)~~<sup>^</sup> principles by enabling hapū and iwi involvement in urban development planning processes, including in decision making where appropriate, and to ensure provision is made for their needs, aspirations, and values, to ensure *urban environments*<sup>\*</sup> enable Māori to express their cultural traditions and norms.
- (2) *Land*<sup>\*</sup> use strategies must be proactively developed and implemented to manage urban development in a manner which:
- (a) has regard to resource management issues of concern to *hapū*<sup>\*</sup> and *iwi*<sup>\*</sup>, including those identified in any relevant *iwi management plan*<sup>\*</sup>,
  - (b) enables papakāinga housing and marae on Māori-owned land<sup>49</sup>,
  - (c) enables early and ongoing engagement with iwi and hapū over urban intensification and expansion,
  - (~~ed~~) ensures *urban environments*<sup>\*</sup> enable Māori to express their cultural traditions and norms, and
  - (~~ee~~) identifies and protects culturally significant areas.

<sup>47</sup> Submission point 7.10

<sup>48</sup> Submission point 1.4, FS1.3

<sup>49</sup> Submission points 7.11, 10.10, 12.13, 17.5

**Key**

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**UFD-P8: Urban development and *climate change*<sup>^</sup>**

(1) *Urban environments*<sup>\*</sup> are developed in ways that support reductions in<sup>50</sup> ~~reduce~~ *greenhouse gas*<sup>^</sup> emissions and improve resilience to the *effects*<sup>\*</sup> of *climate change*<sup>^</sup> by:

- (a) use of urban design, building form and *infrastructure*<sup>^</sup> to minimise the contribution to *climate change*<sup>^</sup> of the development and its future use, including (but not limited to) *energy efficiency*<sup>\*</sup> (including methods to ensure whole-of-life *energy efficiency*<sup>\*</sup>), *water*<sup>\*</sup> efficiency, *waste*<sup>\*</sup> minimisation, transportation modes (including use of *public transport*<sup>\*</sup> and *active transport*<sup>\*</sup>) water-sensitive design and nature-based solutions,
- (b) urban development being compact, well designed and sustainable, and
- (c) requiring best practice<sup>51</sup> resilience to, the impacts of *climate change*<sup>^</sup>, including *sea level rise*<sup>\*</sup> and any increases in the scale and frequency of *natural hazard*<sup>\*</sup> events.

(2) *Territorial Authority*<sup>\*</sup> decisions and controls:

- (a) on *subdivision*<sup>\*</sup> and *land*<sup>\*</sup> use must ensure that sustainable transport options such as *public transport*<sup>\*</sup>, walking and cycling are<sup>52</sup> ~~can be~~ integrated into *land*<sup>\*</sup> use development, and
- (b) on *subdivision*<sup>\*</sup> and housing, including the layout of the *site*<sup>\*</sup> and layout of lots in relation to other houses/*subdivisions*<sup>\*</sup>, must encourage energy-efficient house design and access to solar energy.

**Methods**

Many of the policies in this chapter will be implemented by the Regional Council and *Territorial Authorities*<sup>\*</sup> in plan changes, *district plans*<sup>^</sup> and in decisions on *resource consents*<sup>^</sup> and designations. Non-regulatory approaches are also required to achieve urban form and development policies; these are outlined below in Method 4. The policies in this chapter will also be implemented by methods in other chapters in this Plan.

<b>Method 1</b>	<b>Monitoring and reporting</b>
Description	The aim of this method is to collect information on development and <i>infrastructure</i> <sup>^</sup> trends, needs and pressures in the Region, so that these trends and pressures can be responded to appropriately and in a timely manner, through management of the built environment.

<sup>50</sup> Submission point 11.6

<sup>51</sup> Submission points 7.13, 17.6

<sup>52</sup> Submission point 13.6



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	The Regional Council, together with <i>Territorial Authorities</i> *, must meet the evidence-based decision-making requirements of Subpart 3 of the NPS UD, in relation to <i>urban environments</i> *. This includes a requirement for the Regional Council, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council (with the Wellington Regional Leadership Committee while Horowhenua District Council are part of the Wellington Regional Leadership Committee)</u> <sup>53</sup> to jointly prepare and publish <i>Housing and Business Development Capacity Assessments</i> * and <i>Future Development Strategies</i> *.
Who	Regional Council and <i>Territorial Authorities</i> *
Links to Policy	This method implements UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P7 and UFD-P8.
Target	<ul style="list-style-type: none"> <li>Information collected on development and <i>infrastructure</i><sup>^</sup> trends and pressures in the Region.</li> <li>Monitoring and reporting undertaken that meets the requirements of the NPS UD.</li> </ul>

<b>Method 2</b>	<b>Strategic planning</b>
Description	<p>The aim of this method is to undertake strategic planning to meet the objectives and policies of this Chapter.</p> <p>The Regional Council, together with Palmerston North City Council <u>and Horowhenua District Council (through the Wellington Regional Leadership Committee while Horowhenua District Council are part of the Wellington Regional Leadership Committee)</u><sup>54</sup>, will determine housing <i>development capacity</i>* that is <i>feasible</i>* and likely to be taken up in <i>short term</i>*, <i>medium term</i>*, and <i>long term</i>* through <i>Housing and Business Development Capacity Assessments</i>*. In addition, the Regional Council, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council (through the Wellington Regional Leadership Committee while Horowhenua District Council are part of the Wellington Regional Leadership Committee)</u><sup>55</sup> will jointly prepare <i>Future Development Strategies</i>*.</p> <p>Other <i>Territorial Authorities</i>*, together with the Regional Council, will undertake strategic planning to meet the objectives and policies of this Chapter through similar, but appropriately scaled approaches. This includes the use of structure plans for greenfield residential developments.</p> <p>These strategies will enable decision-making to be based on sufficient information to:</p> <p>(a) coordinate the intensification of <i>urban environments</i>* and the development of extensions to <i>urban environments</i>* with <u>regional council and territorial authority</u><sup>56</sup> <i>infrastructure</i><sup>^</sup> planning,</p> <p>(b) provide the required <i>development infrastructure</i>* in an integrated, timely, efficient and effective way,</p>

<sup>53</sup> Submission point 17.7

<sup>54</sup> Submission point 17.8

<sup>55</sup> Submission point 17.8

<sup>56</sup> Submission point 11.3

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	<p>(c) identify and manage impacts on key values and resources identified by this RPS, and (d) ensure greenfield development is supported by sound evidence (e.g. due to lack of infill capacity, climate change adaption).</p> <p>The above may involve the preparation of spatial plans as a method for applying an integrated strategic planning approach.</p> <p><u>Councils will generally plan and fund for future urban development through their Infrastructure Strategies and Long-term Plans (LTPs). In most cases, facilitating urban development is best done by planning and funding lead infrastructure through the LTP processes, however where necessary or appropriate Councils may seek alternative funding sources outside the LTP. Ultimately, if Councils do not plan for residential growth through the LTP this can result in unplanned or constrained residential growth.</u></p> <p>Methods to achieve <i>active transport</i>* and <i>public transport</i>* strategic outcomes will include providing <i>public transport</i>* services, increasing accessibility via <i>active transport</i>* and micro-mobility devices such as e-bikes and e-scooters, and by implementing the Regional Public Transport Plan.</p> <p>Methods to achieve <i>climate change</i><sup>^</sup> strategic outcomes will include having regard to targets set in the New Zealand Emissions Reduction Plan in decision-making.</p> <p>The Regional Council and <i>Territorial Authorities</i>* will engage with hapū and iwi when undertaking strategic planning to meet the objectives and policies of this Chapter, including to ensure <i>urban environments</i>* enable Māori to express their cultural traditions and norms.</p>
Who	Regional Council and <i>Territorial Authorities</i> *
Links to Policy	This method implements UFD-P1 to UFD-P8.
Target	<ul style="list-style-type: none"> <li>• Urban development strategic planning documents prepared.</li> <li>• Requirements of the NPS UD met.</li> </ul>

<b>Method 3</b>	<b><i>District plans</i><sup>^</sup></b>
Description	<p>The Regional Council will formally seek changes to <i>district plans</i><sup>^</sup>, if necessary, to ensure <i>district plans</i><sup>^</sup>, as soon as reasonably practicable, identify and provide for urban intensification and expansion in a manner consistent with the objectives and policies in this chapter.</p> <p><i>District plans</i><sup>^</sup> must include policies, rules and/or methods to enable a variety of housing types (such as minor dwellings and the development of one and two bedroom homes) and lot sizes to provide for housing densities</p>

Key

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	<p>that meet housing demand and mixed-use development (including affordable housing) in <i>urban environments</i>*.</p> <p><i>Territorial Authorities</i>* may use methods such as Development Contributions Policies and Stormwater Management Plans to ensure the coordinated and efficient provision of new development, <i>development infrastructure</i>* and <i>additional infrastructure</i>*.</p>
Who	Regional Council and <i>Territorial Authorities</i> *
Links to Policy	This method implements UFD-P1 to UFD-P8.
Target	<ul style="list-style-type: none"> <li>• <i>District plan</i><sup>^</sup> changes, if necessary.</li> <li>• Regional Council submissions to <i>Territorial Authorities</i>* on proposed <i>district plan</i><sup>^</sup> changes.</li> </ul>

<b>Method 4</b>	<b>Advocacy</b>
Description	<p>Easily accessible information will be developed and made available to:</p> <p>(a) raise awareness and understanding of natural hazards, <i>greenhouse gas</i><sup>^</sup> reductions, and <i>climate change</i><sup>^</sup>, and</p> <p>(b) advocate infill and intensification as a more sustainable urban development option than greenfield development and urban expansion.</p> <p>Work plans to reduce emissions and adapt to <i>climate change</i><sup>^</sup> will be developed and made available, to raise awareness and understanding.</p> <p>Other methods will include:</p> <p>(a) providing guidance on integrating <i>land</i>* use with <i>development infrastructure</i>* and <i>additional infrastructure</i>*, and for delivering high quality urban design, and</p> <p>(b) preparing and disseminating information to raise awareness and understanding of ways to achieve <i>well-functioning urban environments</i>*.</p> <p>Where appropriate, the Regional Council will <u>promote and</u><sup>57</sup> advocate the objectives and policies in this chapter to external agencies that contribute to shaping urban form and development, such as Kāinga Ora.</p>
Who	Regional Council and <i>Territorial Authorities</i> *
Links to Policy	This method implements UFD-P4, UFD-P5, UFD-P7 and UFD-P8.
Target	<ul style="list-style-type: none"> <li>• Submissions to reforms and strategies from central government agencies, including Kāinga Ora.</li> <li>• Ongoing advice and advocacy to interested parties.</li> </ul>

## Principal Reasons

<sup>57</sup> Submission point 17.9

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**UFD-PR1: Strategic urban development**

Objectives UFD-O1 and UFD-O2 have been adopted to provide guidance on the importance of integrating urban growth with *infrastructure* provision, and the retention of versatile soils for use as production land. Objective UFD-O1 and Policy UFD-P1 set up an overarching framework for ensuring urban development occurs in a strategically planned manner. Proactively developing and implementing appropriate *land* use strategies to enable urban growth and manage its *effects*\* will ensure the efficient and effective provision of *development infrastructure*\* and *additional infrastructure*\*, and contribute to the objectives of the National Policy Statement on Urban Development 2020.

**UFD-PR2: Urban growth and rural residential *subdivision*\* on highly productive land<sup>58</sup> versatile soils**

The RMA requires those with functions under it to have regard to resource costs and benefits of development. For example, directing urban growth and rural residential *subdivision*\* away from highly productive land\* onto less versatile soils may increase travel distances, costs of service provision or other economic or environmental costs of *land*\* development. However, allowing urban expansion onto highly productive land\* versatile soils adjacent to urban areas will result in a reduction of options for their future productive use, which is a cost to future generations. There are a range of factors required to enable *land*\* to be used for productive use. *Territorial Authorities*\* need to weigh all relevant matters when making *land*\* use decisions.

**UFD-PR3: Urban form, function and development**

Objectives UFD-O1, UFD-O3 to UFD-O5, along with Policies UFD-P1 to UFD-P2 and UFD-P4 to UFD-P8, give effect to the requirements of the National Policy Statement on Urban Development 2020 and are intended to achieve its objectives. The intended results include the provision of *well-functioning urban environments*\* and improvements to the responsiveness and competitiveness of *land*\* and development markets. 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.

**Anticipated Environmental Results**

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<sup>58</sup> Submission points 7.7, 10.2, 12.19

Draft only – not Council policy

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Anticipated Environmental Result	Link to Policy	Indicator	Data Source
<b>UFD-AER1:</b> Urban growth occurs in a strategically planned manner.	UFD-P1, <u>UFD-P7<sup>59</sup></u>	<ul style="list-style-type: none"> <li>Urban growth</li> <li><u>Land use strategies</u></li> <li><u>Iwi and hapū involvement in development planning processes</u></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>
<b>UFD-AER2:</b> <u>Highly productive land<sup>60</sup> is Class 1 and II versatile soils are retained</u> , where appropriate for productive use.	UFD-P3	<ul style="list-style-type: none"> <li>Urban growth and rural residential <i>subdivision</i><sup>*</sup></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>
<b>UFD-AER3:</b> Urban intensification is achieved.	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6, <u>UFD-P7</u>	<ul style="list-style-type: none"> <li>Urban intensification</li> <li><i>Housing bottom lines</i><sup>*</sup> achieved</li> <li><u>Land use strategies</u></li> <li><u>Iwi and hapū involvement in development planning processes</u></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> <li>NPS UD monitoring requirements</li> </ul>
<b>UFD-AER4:</b> <i>Development infrastructure</i> <sup>*</sup> is in place in time to facilitate urban intensification or expansion	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	<ul style="list-style-type: none"> <li>Urban intensification and growth</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>
<b>UFD-AER5:</b> New developments maximise energy and transport efficiency.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> <li>Solar energy provisions in <i>district plans</i><sup>^</sup></li> <li>Increases in <i>active transport</i><sup>*</sup> and <i>public transport</i><sup>*</sup></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> <li>Regional Land Transport Plan indicator monitoring</li> <li>Census: main means of travel</li> </ul>
<b>UFD-AER6:</b> Risks due to the impacts of <i>climate change</i> <sup>^</sup> are minimal to new developments.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> <li>Urban intensification and growth</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>

<sup>59</sup> Scope provided by Rangitikei District Council submission point 12.20

<sup>60</sup> Submission points 7.7, 10.2, 12.20

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## Definitions to be added to One Plan

<b>Active transport</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means forms of transport that involve physical exercise, such as walking or cycling, and includes transport that may use a mobility aid such as a wheelchair.</p>
<b>Additional infrastructure</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means:</p> <ul style="list-style-type: none"> <li>(a) public open space</li> <li>(b) community infrastructure as defined in section 197 of the Local Government Act 2002</li> <li>(c) land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities</li> <li>(d) social infrastructure, such as schools and healthcare facilities</li> <li>(e) a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)</li> <li>(f) a network operated for the purpose of transmitting or distributing electricity or gas</li> </ul>
<b>Business Land</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means land that is zoned, or identified in an FDS or similar strategy or plan, for business uses in urban environments, including but not limited to land in the following:</p> <ul style="list-style-type: none"> <li>(a) any industrial zone</li> <li>(b) the commercial zone</li> <li>(c) the large format retail zone</li> <li>(d) any centre zone, to the extent it allows business uses</li> <li>(e) the mixed use zone, to the extent it allows business uses</li> <li>(f) any special purpose zone, to the extent it allows business uses.</li> </ul>
<b>Centre Zone</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means any of the following zones:</p> <ul style="list-style-type: none"> <li>(a) city centre zone</li> <li>(b) metropolitan centre zone</li> <li>(c) town centre zone</li> <li>(d) local centre zone</li> <li>(e) neighbourhood centre zone</li> </ul>

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<b>Community services</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the following:</p> <ul style="list-style-type: none"> <li>(a) community facilities</li> <li>(b) educational facilities</li> <li>(c) those commercial activities that serve the needs of the community.</li> </ul>
<b>Development capacity</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the capacity of land to be developed for housing or for business use, based on:</p> <ul style="list-style-type: none"> <li>(a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and</li> <li>(b) the provision of adequate development infrastructure to support the development of land for housing or business use.</li> </ul>
<b>Development infrastructure</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>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):</p> <ul style="list-style-type: none"> <li>(a) network infrastructure for <i>water*</i> supply, wastewater, or stormwater</li> <li>(b) land transport (as defined in section 5 of the Land Transport Management Act 2003).</li> </ul>
<b>Feasible</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means:</p> <ul style="list-style-type: none"> <li>(a) for the short term or medium term, commercially viable to a developer based on the current relationship between costs and revenue</li> <li>(b) for the long term, commercially viable to a developer based on the current relationship between costs and revenue, or on any reasonable adjustment to that relationship.</li> </ul>
<b>Future Development Strategy</b>	<p>has the same meaning as in the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the Future Development Strategy required by subpart 4 of Part 3.</p>

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<b>Highly Productive Land<sup>61</sup></b>	<p><a href="#">has the same meaning as in the National Policy Statement for Highly Productive Land 2020 (as set out below)</a></p> <p><a href="#">means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)</a></p>
<b>Housing and Business Development Capacity Assessment</b>	<p>has the same meaning as in the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the Housing and Business Development Capacity Assessment required by subpart 5 of Part 3.</p>
<b>Housing bottom lines</b>	<p>Housing bottom lines means the amount of development capacity that is sufficient to meet expected housing demand plus the appropriate competitiveness margin, as required by clause 3.6(1) of the National Policy Statement on Urban Development.</p>
<b>Infrastructure-ready</b>	<p>has the same meaning as in clause 3.4(3) of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>Development capacity is infrastructure-ready if:</p> <ul style="list-style-type: none"> <li>(a) in relation to the short term, there is adequate existing development infrastructure to support the development of the land,</li> <li>(b) in relation to the medium term, either paragraph (a) applies, or funding for adequate infrastructure to support development of the land is identified in a long-term plan,</li> <li>(c) in relation to the long term, either paragraph (b) applies, or the development infrastructure to support the development capacity is identified in the local authority’s infrastructure strategy (as required as part of its long-term plan).</li> </ul>
<b>Long Term</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means between 10 and 30 years.</p>
<b>Medium Term</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means between 3 and 10 years.</p>

<sup>61</sup> Submission point 14.6



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<p><u>Nationally significant infrastructure</u><sup>62</sup></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 all of the following:</u></p> <ul style="list-style-type: none"> <li><u>(a) State highways</u></li> <li><u>(b) The national grid electricity transmission network</u></li> <li><u>(c) Renewable electricity generation facilities that connect with the national grid</u></li> <li><u>(d) The high-pressure gas transmission pipeline network operating in the North Island</u></li> <li><u>(e) The refinery pipeline between Marsden Point and Wiri</u></li> <li><u>(f) The New Zealand rail network (including light rail)</u></li> <li><u>(g) Rapid transit services (as defined in this clause)</u></li> <li><u>(h) Any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers</u></li> <li><u>(i) The port facilities (but not the facilities of any ancillary commercial activities) of each port company referred to in item 6 of Part A of Schedule 1 of the Civil Defence Emergency Management Act 2002</u></li> </ul>
<p><b>Plan-enabled</b></p>	<p>has the same meaning as in clause 3.4(1) of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>Development capacity is plan-enabled for housing or for business land if:</p> <ul style="list-style-type: none"> <li>(a) in relation to the short term, it is on land that is zoned for housing or for business use (as applicable) in an operative district plan</li> <li>(b) in relation to the medium term, either paragraph (a) applies, or it is on land that is zoned for housing or for business use (as applicable) in a proposed district plan</li> <li>(c) in relation to the long term, either paragraph (b) applies, or it is on land identified by the local authority for future urban use or urban intensification in an FDS or, if the local authority is not required to have an FDS, any other relevant plan or strategy.</li> </ul> <p>For the purpose of this definition, land is zoned for housing or for business use (as applicable) only if the housing or business use is a permitted, controlled, or restricted discretionary activity on that land.</p>
<p><b>Planned</b></p>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>in relation to forms or features of transport, means planned in a regional land transport plan prepared and approved under the Land Transport Management Act 2003.</p>

<sup>62</sup> Submission point 1.5, FS1.4

Key

One Plan wording to be retained	Black
Notified One Plan wording to be removed	<del>Black with strikethrough</del>
Notified changes	Purple
S42A recommended changes – new text	<u>Blue text underlined</u>
S42A text to be removed	<del>Blue with strikethrough</del>
S42A rebuttal evidence – new text	<u>Black text underlined</u>
Council reply – new text	<u>Orange text underlined</u>
Council reply – text to be removed	<del>Orange with strikethrough</del>

<b>Planning decision</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means a decision on any of the following:</p> <ul style="list-style-type: none"> <li>(a) a regional policy statement or proposed regional policy statement</li> <li>(b) a regional plan or proposed regional plan</li> <li>(c) a district plan or proposed district plan</li> <li>(d) a resource consent</li> <li>(e) a designation</li> <li>(f) a heritage order</li> <li>(g) a water conservation order</li> </ul>
<b>Public transport</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means any existing or planned service for the carriage of passengers (other than an aeroplane) that is available to the public generally by means of:</p> <ul style="list-style-type: none"> <li>(a) a vehicle designed or adapted to carry more than 12 persons (including the driver), or</li> <li>(b) a rail vehicle, or</li> <li>(c) a ferry.</li> </ul>
<b>Receiving environment</b>	<p><u>has the same meaning as in clause 1.4 of the National Policy Statement for Freshwater Management 2020 (as set out below):</u></p> <p><u>includes, but is not limited to, any water body (such as a river, lake, wetland or aquifer) and the coastal marine area (including estuaries)</u></p>
<b>Short term</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means within the next 3 years.</p>
<b>Sufficient development capacity</b>	<p>has the same meaning as in clauses 3.2(2) and 3.3(2) of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means development capacity that must be the following in order to meet expected demand for housing and business land:</p> <ul style="list-style-type: none"> <li>(a) plan-enabled; and</li> <li>(b) infrastructure-ready; and</li> <li>(c) for housing, feasible and reasonably expected to be realised; and</li> <li>(d) for business land, suitable to meet the demands of different business sectors; and</li> <li>(e) for Palmerston North only, meet the expected demand plus a competitiveness margin of 20% for the short term, 20% for the medium term, and 15% for the long term.</li> </ul>

**Draft only – not Council policy**

**Key**

One Plan wording to be retained	Black
Notified One Plan wording to be removed	<del>Black with strikethrough</del>
Notified changes	Purple
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Council reply – text to be removed	<del><u>Orange with strikethrough</u></del>

<b>Urban environment</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:</p> <p>(a) is, or is intended to be, predominantly urban in character; and</p> <p>(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.</p>
<b>Well-functioning urban environments</b>	<p>has the same meaning as in Policy 1 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>well-functioning urban environments are urban environments that, as a minimum:</p> <p>(a) Have or enable a variety of homes that:</p> <p>(i) meet the needs, in terms of type, price, and location, of different households; and</p> <p>(ii) enable Māori to express their cultural traditions and norms; and</p> <p>(b) have or enable a variety of <i>sites</i>* that are suitable for different business sectors in terms of location and <i>site</i>* size; and</p> <p>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</p> <p>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p>

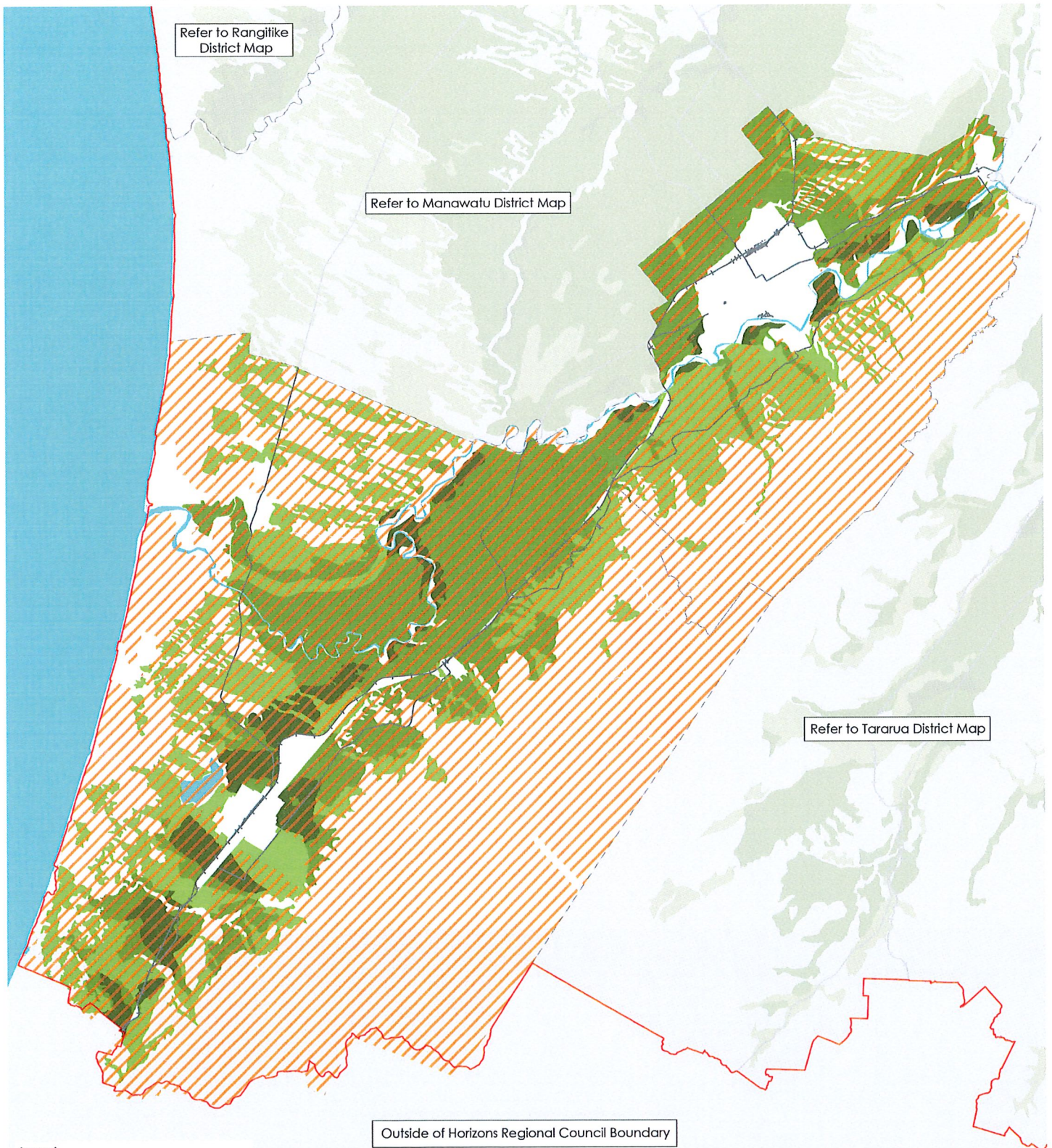
# 1.0

## NZLRI LUC 1-3 & Rural Zoning

1. Horowhenua District & Palmerston North District/City
2. Manawatu District
3. Rangitikei District
4. Ruapehu District
5. Tararua District
6. Whanganui District

# Horowhenua and Palmerston North City

Scale: 1:200,000 @ A3  
Date: November 2023



## Legend

- NZLRI LUC 1
- NZLRI LUC 2
- NZLRI LUC 3
- Existing rural zones\*
- Horizons Regional Council boundary
- District council boundaries
- Water bodies
- State highways
- Railways

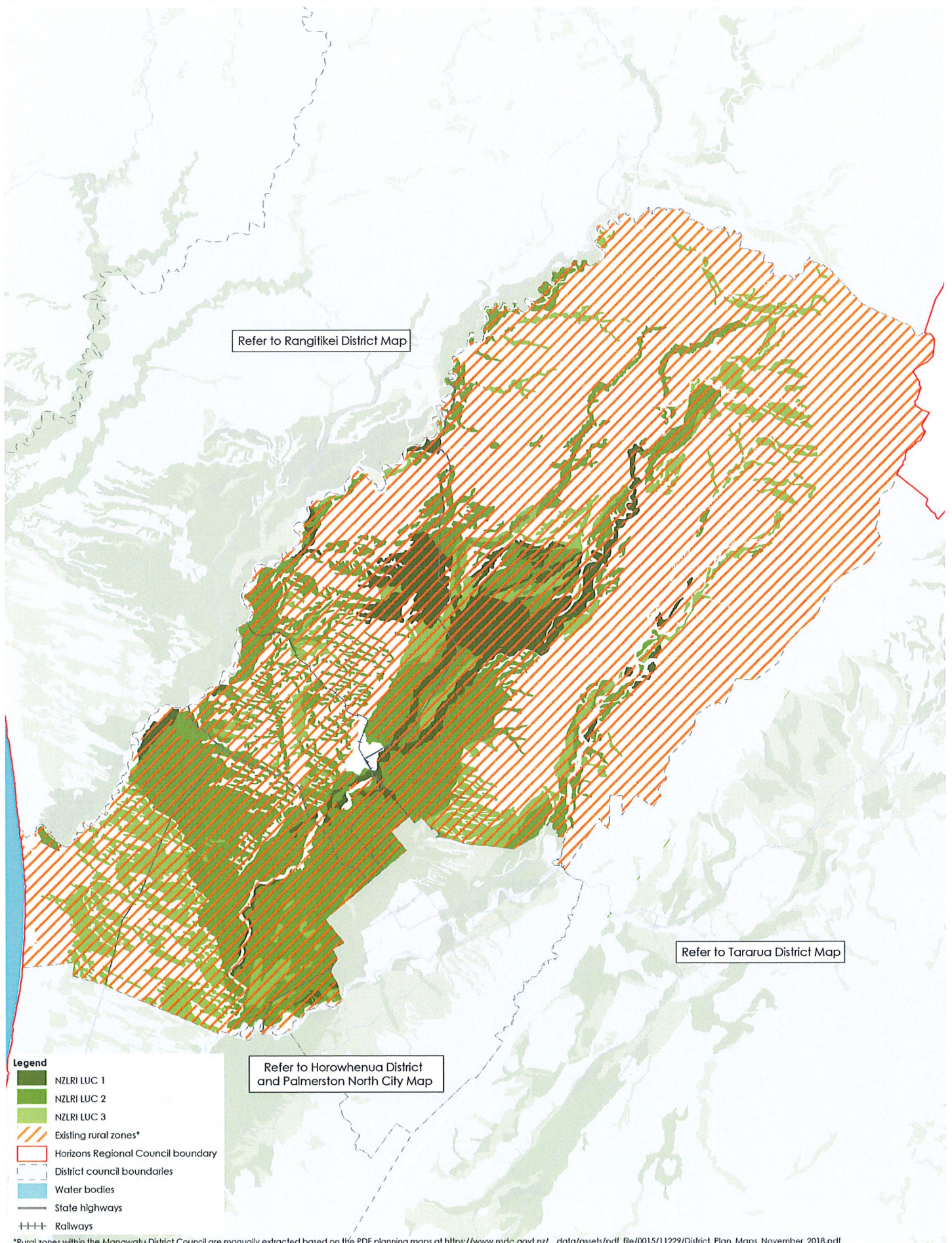
\*Rural zones within the Horowhenua District Council are manually extracted based on the online planning map viewer of <https://mapit.horowhenua.govt.nz/HDCGPGISNZ/>

\*Rural zones within the Palmerston North City Council are extracted through the public GIS portal of <https://data-pncc.opendata.arcgis.com/datasets/PNCC::pncc-district-plan-zones/explore>

# Manawatu District

Scale: 1:280,000 @ A3

Date: November 2023

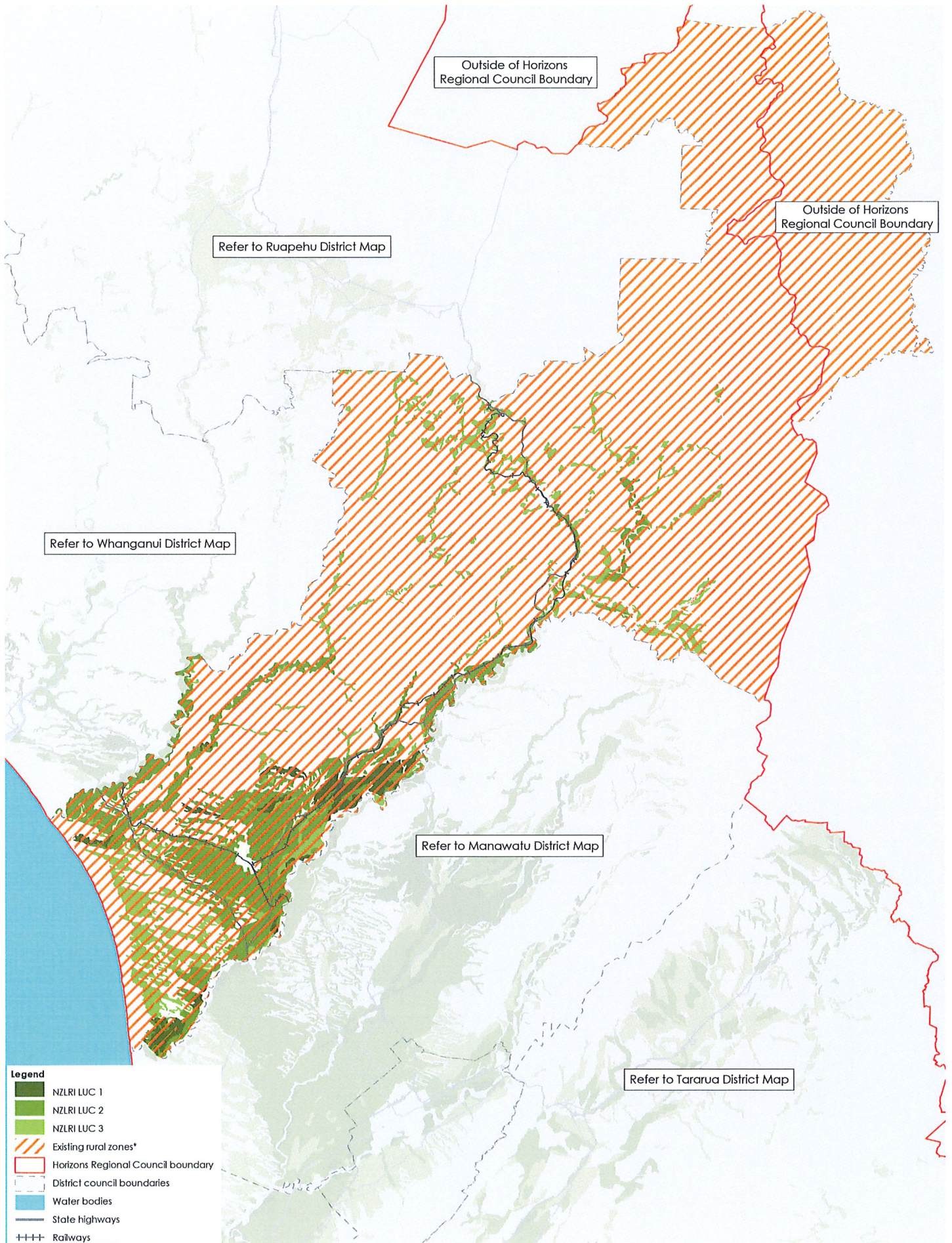


\*Rural zones within the Manawatu District Council are manually extracted based on the PDF planning maps at [https://www.mdc.govt.nz/\\_data/assets/pdf\\_file/0015/11229/District\\_Plan\\_Maps\\_November\\_2018.pdf](https://www.mdc.govt.nz/_data/assets/pdf_file/0015/11229/District_Plan_Maps_November_2018.pdf)

# Rangitikei District

Scale: 1:400,000 @ A3

Date: November 2023

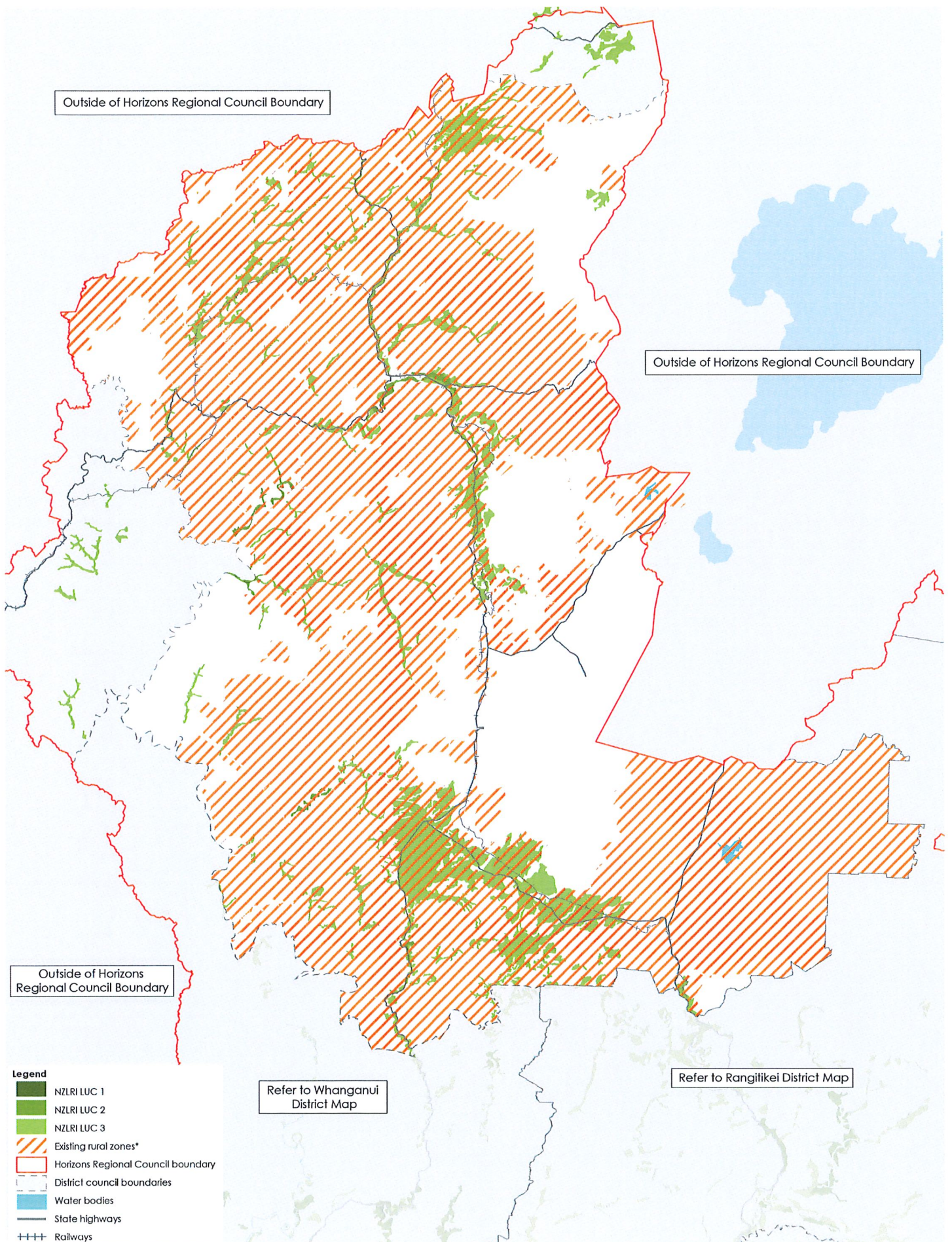


\*Rural zones within the Rangitikei District Council are extracted through the public GIS portal at <https://geohub-rangitikeidc.opendata.arcgis.com/datasets/>

# Ruapehu District

Scale: 1:400,000 @ A3

Date: November 2023



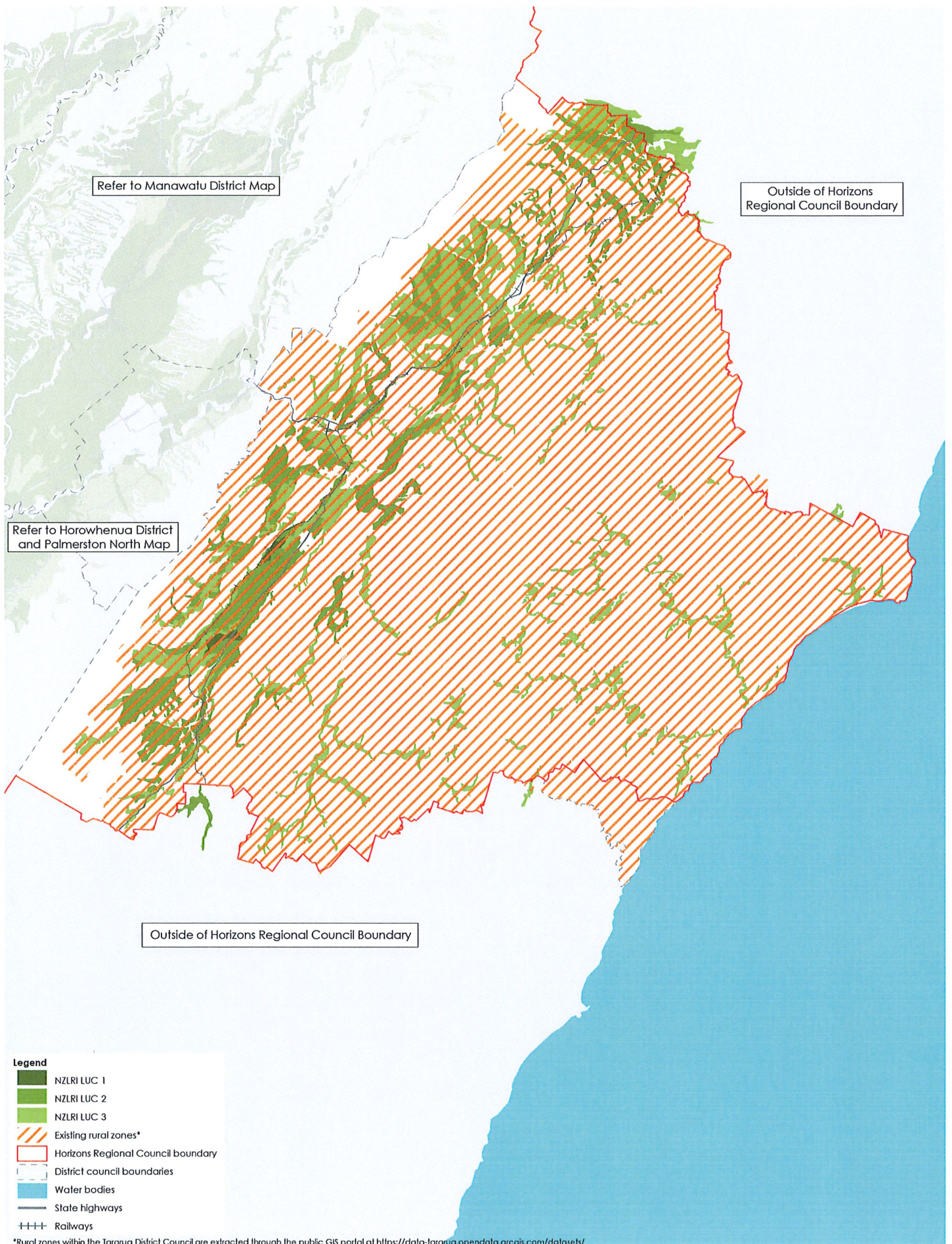
\*Rural zones within the Ruapehu District Council are manually extracted based on the PDF planning maps at <https://www.ruapehudc.govt.nz/our-services/district-plan-and-resource-consents/districtplan/district-plan-maps>



# Tararua District

Scale: 1:360,000 @ A3

Date: November 2023



\*Rural zones within the Tararua District Council are extracted through the public GIS portal at <https://data-tararua.opendata.arcgis.com/datasets/>

# Whanganui District

Scale: 1:260,000 @ A3

Date: November 2023

