

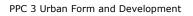
Section 32 Evaluation Report Urban Form & Development (Proposed Plan Change 3)

September 2022



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1. Executive Summary

This section 32 report evaluates Proposed Plan Change 3 (PPC) to the Manawatū-Whanganui Regional Council (Horizons)¹ One Plan. The report summarises the evaluation of alternatives, costs and benefits undertaken by Horizons in respect to proposed changes to the Regional Policy Statement (RPS) relating to urban growth. In summary, Horizons must establish that the PPC is the most appropriate way to achieve the purpose of the Act, including an assessment that the proposed changes are the most appropriate means available to achieve the objectives – when compared against alternative methods available, including 'doing nothing' (the 'status quo' option).

The PPC proposes to introduce new provisions to the RPS to give effect to the National Policy Statement on Urban Development 2020 (NPS UD). The report considers the legislative and planning context against the state of the One Plan currently (section 3), consultation undertaken on the PPC (section 5), and the issues that the PPC is designed to address (section 6).

The PPC is evaluated as having a low to medium scale and level of significance (section 7). This report goes on to conclude that (section 8) the PPC be the best available means to achieve the objectives and the sustainable management purpose of the RMA.

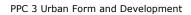
2. Purpose and Overview

The PPC proposes to introduce new provisions to the RPS to give effect to the National Policy Statement on Urban Development 2020 (NPS UD). The PPC sets out objectives and policies for the provision of sufficient development capacity to meet the expected demand for housing and business land, and for the planning of well-functioning urban environments. It is intended to improve the responsiveness and competitiveness of land and development markets, improve resilience to climate change, and ensure planning decisions relating to urban environments take into account the Te Tiriti o Waitangi. The NPS UD is the driver for this proposed plan change (PPC).

Issue	Contributing factors	Current response	Effect from intended outcomes
A need to give effect to the objectives and policies of the NPS UD	Growing population. Increasing urbanisation. Urban land markets not adequately facilitating housing development to keep up with growth. A need for a greater level of strategic planning for urban development and infrastructure.	The current One Plan provisions provide direction for some of the matters the NPS UD addresses (as outlined in Section 3.2.2 of this report), however the NPSUD introduced a new national policy approach to urban development, including several objectives and policies that need to be addressed in the RPS if it does not already do so.	Will improve policy response and guidance to urban development by providing a framework for achieving well- functioning urban environments, meeting housing demand and providing adequate infrastructure.

Key outcomes sought from the PPC include achieving the objectives of the NPS UD, addressing housing capacity shortfalls, ensuring Te Tiriti of Waitangi principles are accounted for in planning decisions, and providing clear guidance to the territorial authorities around urban intensification.

¹ The trading name of the Manawatū-Whanganui Regional Council.





This PPC is limited to what is required to give immediate effect to the NPS UD and where there are matters relating to urban growth (directly or indirectly) already addressed in the RPS provisions, these have been preserved pending further, substantive review. They will be read alongside the new objective and policies, and the NPS UD. Wider amendments and updates to the RPS are proposed as part of a programme commencing with the Freshwater Planning Process in 2024.

3. Statutory and Planning Framework

This section identifies the legislative and national, regional, and local policy framework that provides the context for the PPC.

3.1. Requirements of section 32 of the Resource Management Act 1991

Section 32 of the Resource Management Act 1991 (RMA) requires the preparation of evaluation reports when preparing plan changes to any regional (and district) plan.

Section 32 requires that each proposed objective in a plan change is to be evaluated by the extent to which it is the most appropriate way to achieve the purpose of the RMA. A section 32 evaluation must also examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by identifying other reasonably practicable options for achieving the objectives and assessing the efficiency and effectiveness of policies, rules, and other methods in considering whether they are the most appropriate means of achieving these objectives. The evaluation must consider the benefits and costs of the proposal (and "*if practicable*", to quantify those benefits and costs) and assess the risk of acting or not acting if there is uncertain or insufficient information.

This section 32 report has been prepared to fulfil the obligations of Horizons under s 32 of the RMA. This report should be read together with the text of the One Plan, the PPC, and any supporting appendices.

3.2. National context

3.2.1. Resource Management Act 1991

The RMA requires Horizons to change its RPS (and if relevant, regional plan) in accordance with the provisions of Part 2. Similarly, section 32(1)(a), RMA requires an evaluation report to examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. The purpose and principles are set out in Part 2, sections 5-8 of the RMA. Other sections of the RMA also considered relevant to the PPC are set out below

The purpose of the RMA, set out in section 5, is to promote the sustainable management of natural and physical resources. Sustainable management is defined as:

managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while -

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet
- the reasonably foreseeable needs of future generations; and
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.

Matters of national importance, and matters which Horizons must have particular regard to, are set out at sections 6, 7, and 8 respectively.



Section	Relevant matter	Explanation
S6(e)	the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga	Policy 1 of the NPS UD requires planning decisions to contribute to urban environments that, at a minimum, have or enable a variety of homes so Māori may express their cultural traditions and norms. The intent of this policy is to ensure homes (including where they are located, the type of homes provided and the cost of the homes) enable Māori to live in urban environments that meet their needs for cultural expression. The NPS UD also requires planning decisions to enable Māori to express their cultural traditions and norms and to take into account Te Tiriti o Waitangi.
Other s6 matters		Well-functioning urban environments, with well-planned infrastructure delivery, and resilience to the effects of climate change, all support matters arising out of section 6. This includes, to varying degrees, matters identified in (c), relating to protection of significant indigenous vegetation and significant habitats of indigenous fauna, and (h), the management of significant risks from natural hazards.

With respect to urban development, the following matter of national importance is relevant:

Section 7 requires Horizons to have particular regard to a range of 'other matters'. The section 7 matters relevant to this topic are:

Section	Relevant matter	Explanation
S7(b)	the efficient use and development of natural and physical resources	The NPS UD and this PPC include provisions to ensure urban environments are developed in way that results in the efficient use and development of natural and physical resources (including Objectives 3 and 8 of the NPS UD).
S7(ba)	the efficiency of the end use of energy	Provisions in relation to energy efficient urban developments are included in the NPS UD and this PPC (including Objective 8 of the NPS UD).
S7(c)	the maintenance and enhancement of amenity values	Objective 4 and Policy 6 of the NPS UD address this matter, as reflected in the PPC.
S7(f)	maintenance and enhancement of the quality of the environment	The PPC (and existing provisions in the One Plan) provide guidance on achieving a built form that relates well to its surrounding environment.
S7(i)	the effects of climate change	Objective 8 and Policies 1 and 6 of the NPS UD address this matter, with provisions included in the PPC to implement this direction.



Section 8 requires the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) to be accounted for in planning decisions. Well-functioning urban environments must also enable Māori to express their cultural traditions and norms. These matters have been reflected in the PPC. Iwi and hapū in the region have also been involved in the PPC process through ongoing engagement and dialogue. Section 5.2 below describes how this feedback has informed the Section 32 evaluation.

Section 30 gives Horizons the function of, amongst other things, the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in relation to housing and business land to meet the expected demands of the region (s 30(1)(ba)). This PPC responds to this regional function of Horizons. Further, sections 61, 62 and 67, RMA set out the content that must be included in the RPS and the Regional Plan and defines the relationships between regional and national planning documents.

3.2.2. National Instruments

Sections 55 and 58I, RMA describe how Horizons must recognise and give effect to national policy statements and national planning standards.

There are five National Policy Statements (NPS) currently in force:

- New Zealand Coastal Policy Statement 2010
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020
- NPS for Renewable Electricity Generation 2011
- NPS for Electricity Transmission 2008

The NZCPS remains relevant due to the management of development in the coastal environment, along with the following NPS and associated provisions:

- NPS Urban Development
- NPS Freshwater

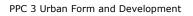
National Policy Statement Urban Development

The NPS UD is central to this PPC. It introduces the concept of a well-functioning urban environment and requires that planning decisions contributes to it. This is reflected in Objective 1 of the NPS UD. The meaning of well-functioning urban environment is set out in Policy 1. Along with providing for well-functioning urban environments, the RPS must provide for sufficient development capacity to meet the different needs of people and communities. Further, it must:

- Ensure urban development occurs in a way that takes into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
- Ensure that plans make room for growth both intensification and expansion, and that rules are not unnecessarily constraining growth.
- Develop, monitor, and maintain an evidence base about demand, supply and prices for housing and land to inform planning decisions.
- Provide for planning processes that implement the NPS UD requirements.

The NPS UD identifies Palmerston North City Council (PNCC) as a Tier 2 local authority. Horowhenua, Whanganui, and Manawatū District Council are Tier 3 local authorities. Some policies in the NPS UD apply only to Tier 1 and 2 urban environments, other policies apply to Tier 3 urban environments. Responsive planning requirements (Policy 8) apply to all tier local authorities. Criteria must be included in the RPS to determine what plan change requests will be treated as adding development capacity. It is the responsibility of Horizons, as the regional authority, to implement responsive planning and intensification requirements through the RPS change. These will then be given effect to/implemented by the territorial authorities within district plans.

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 amended the RMA to bolster and accelerate implementation of the NPS UD by enabling higher





densities in some localities/areas. This legislation is more relevant for district plan changes and the role of territorial authorities, given the directions to the TAs to include policies and rules in those planning documents. It does not directly impact the RPS.

Other National Policy Statements

All relevant national policy statements apply to urban development regardless of this PPC. No hierarchy exists to prioritise the relationship between provisions in the NPS UD and other National Policy Statements. Any conflict will be addressed at the time of any planning decision having attempted to reconcile the differences – all relevant documents should be read together.

The PPC includes provisions that respond to Objective 1 and Policy 3 of the NPS FM. This includes promoting resilient design methods in urban development, including water-sensitive design and nature-based solutions. More broadly, the NPS FM requires an integrated approach to freshwater and land use (urban) development with a focus on defining wetlands, identifying suitable water supply, wastewater and stormwater infrastructure, and discharges. A separate proposed plan change to fully implement the NPS FM will be notified in 2024.

In addition, the Government is proposing a National Policy Statement for Highly Productive Land (NPS-HPL) to improve the way highly productive land is managed under the Resource Management Act 1991, and a National Policy Statement for Indigenous Biodiversity (NPS-IB) which seeks to identify, protect, manage and restore indigenous biodiversity. As of August 2022, these proposed national policy statements had not been introduced by central government, although an exposure draft of the NPS IB had been released in June 2022.

There are also a number of National Environmental Standards and regulations in force; none are relevant to this topic.

3.2.3. National Planning Standards

The National Planning Standards were introduced in April 2019, with the purpose of improving the consistency of councils' resource management plans and policy statements. The One Plan is being transformed into the National Planning Standards format through Plan Amendment 3 (2022). This PPC has been prepared to be consistent with the National Planning Standards format.

3.2.4. Other relevant legislation and regulation

There is no other relevant legislation or regulation (other than any Treaty Settlement legislation which is considered in section 3.3.1 below).

3.3. Regional and local context

3.3.1. Iwi and hapū

When changing the Regional Policy Statement or Regional Plan, Horizons must take into account any relevant planning document recognised by an iwi authority and lodged with the Regional Council. In the case of PPC 3, this applies to the documents set out below, with the relevant provisions considered in preparation of the PPC, as highlighted also, through engagement with iwi and hapū. The PPC provisions which account for sustainable and compact urban environments, climate change, timing and integration of infrastructure, the involvement of iwi and hapū and their traditions and customs in the development of urban environments, the enabling of papakāinga and Marae, amongst others, are considered to reflect the relevant planning provisions below.



Iwi planning document	Relevant provisions
Ngāti Rangi Taiao Management Plan	 2.2.5 Future housing development projects will promote sustainable living and be in line with but not limited to the following attributes: a. be self-sufficient; b. be built with sustainable materials; c. have low to nil environmental impact; d. generate own power; e. have water storage facilities; f. have water recycling; and/or g. have composting toilets where this is beneficial. Where possible, renovations will also follow these principles 7.2.2 Ngāti Rangi encourages individual homes, papakāinga, marae and businesses towards self-sustaining fossil-fuel free power.
Nga Rauru Kiitahi Puutaiao Management Plan	2.4 TKOR will promote sustainable development techniques for infrastructure development.
	3.5.3 We believe our local councils must provide for the development of renewable energy resources and uses.
	5.3 Protect our wāhi tapu / wāhi tūpuna from inappropriate subdivision, modification and development that would cause adverse effects on the qualities and features which contribute to the cultural, spiritual and historical values of these sites.
Te Kāuru Eastern Manawatū River Hapū Collective Te Kāuru Taiao Strategy	No provisions specifically relating to urban development.
Ngāti Maniapoto Ko Tā Manaiapoto Mahere Taiao	8.3.1 To enable the people of Maniapoto to develop papakāinga and Marae.
	13.3.1 Promote and support urban planning to reduce transport emissions.
	14.3.2.4 Ensure new land use developments use low impact urban design and sustainable options for on-site stormwater management.
	18.3.1.3 Urban planning and development is conducted in accordance with best practice principles, and infrastructure services provide for the environmental, social, economic, and cultural needs of Maniapoto within the financial capacity of the community.
	22.2.3.2 2 The quality, location and design of infrastructure can have a significant influence on transport choices – such as whether to walk, cycle, use a private vehicle or take public transport. In rural areas and small towns, low population density and long distances reduce options considerably resulting in a high reliance on the private motor vehicle for daily activities and trucks for freight. The transport network is critical to industry in the rohe, particularly agriculture, forestry and tourism.
	22.2.6.2 There is a general lack of Maniapoto identity, culture and visibility in landscape and urban designs within Maniapoto rohe and community developments. Maniapoto participation in community planning and development will ensure Maniapoto

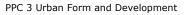


Iwi planning document	Relevant provisions
	values are recognised and acknowledged. For example, the use of traditional place names, interpretation panels and artworks for social infrastructure projects will enhance and raise awareness and understanding within communities of the role of Maniapoto and the historical contribution of Maniapoto lands made to this region.
Ngāti Tuwharetoa Iwi Environmental Management Plan	Protect important landscape features from inappropriate use and development.
Ki Uta, Ki Tai, Ngā Puna Rau o Rangitīkei, Catchment Strategy and Action Plan.	No provisions specifically relating to urban development.
He Mahere Pūtahitanga: A pan-tribal Iwi Planning Document on behalf of the Central North Island Forests	We want to reconnect, restore balance and find better ways to live with the land - for ourselves and our tamariki and mokopuna. Therefore, we want to ensure that: • we are visible; we are heard; and we are influential;
	• our relationship with our Treaty settlement lands is recognised;
	• we collectively have fair access to development opportunities for our land in a way that promotes sustainable management.

There are no Mana Whakahono a Rohe agreements established for the Manawatū-Whanganui Region at present.

3.3.2. Other regional and local policies, plans and strategies

Planning document	Relevant provisions
Regional Land Transport Plan (RLTP)	Land use planning can have a significant influence on travel choice and transport network demand. Likewise, transport network investment can shape land use patterns within a region.
	The Land Transport Management Act 2003 requires the Manawatū Whanganui Regional Transport Committee to take the One Plan Regional Policy Statement into account when developing the RLTP.
	The following provision in the 2021-2031 Manawatū Whanganui RLTP is also of relevance:
	"Policy 5.5: Ensure the requirements of the National Policy Statement for Urban Development 2020 are met, including but not limited to development of a Future Development Strategy for Palmerston North in conjunction with Palmerston North City Council."
Regional Public Transport Plan (RPTP)	The Manawatū-Whanganui RPTP sets out the public transport system that Horizons Regional Council, in





Planning document	Relevant provisions
	partnership with local councils, proposes to fund and operate. The following objectives apply to all public transport services units, taxi services and shuttle services that Horizons provides financial assistance to:
	 A reliable, integrated, accessible and sustainable public transport system; An effective procurement system that delivers the desired public transport services; A safe and accessible network of supporting infrastructure; and Increasing patronage.
Wellington Regional Growth Framework – July 2021	The Wellington Regional Growth Framework (the Framework) is a spatial plan that has been developed by local government, central government and iwi partners in the Wellington-Horowhenua region to provide councils and iwi in the region with an agreed regional direction for growth and investment, and deliver on the Urban Growth Agenda objectives of the Government. The Framework includes Horowhenua District which is part of Horizons' Region.
	The Framework identifies a number of opportunities of relevance to this PPC, as well as to the NPS UD. These include:
	 Increase housing supply and improve housing affordability and choice in walkable neighbourhoods.
	 Increase housing density in high-quality urban environments to support community wellbeing.
	• Partner with iwi and Māori across the region to deliver improved housing and economic outcomes.
	• Enable growth that protects and enhances the quality of the natural environment and accounts for a transition to a zero-carbon future.
	• Improve multi-modal access to and between housing, employment, education and services, with a particular focus on a significant step change in mode share for public transport and active modes.
	• Encourage a more sustainable, resilient and affordable urban form that makes efficient use of existing infrastructure and resources.
	• Build climate change resilience and avoid increasing the risks and impacts of natural hazards.
	• Create more easily accessible employment opportunities.
Palmerston North City Council's 'Housing Capacity Assessment Report – June 2021'	This report provides a comprehensive analysis of the demand for, and supply of housing and future housing targets for Palmerston North.



Planning document	Relevant provisions
(A copy of this report is available at <u>https://www.pncc.govt.nz/Council-</u> <u>city/Official-</u> <u>documents/Research/Urban-</u> <u>development)</u>	The NPS UD requires the Council to set housing bottom lines (growth targets) which must be inserted into the District Plan and Regional Policy Statements – these are identified within this section 32 report and the PPC.
Horowhenua Growth Strategy 2040 (A copy of this strategy is available at: https://www.horowhenua.govt.nz/fil es/assets/public/council- documents/strategies/horowhenua- growth-strategy-2040-2022- update.pdf)	The purpose of the Growth Strategy is to help guide decisions about where, when and how to accommodate the projected increase of population, households and jobs to the year 2040. The Growth Strategy was updated in 2021/22 in response to increasing population and housing projections.
Territorial Authority (TA) District Plans	TA District Plans currently give effect to existing RPS Objectives 3-3 and 3-4, Policies 3-4 and 3-5 (see Section 3.3.2). The RPS has allocated responsibility to territorial authorities in the region for these functions.

3.4. One Plan

3.4.1. Existing One Plan approach

The One Plan became operative in December 2014. The One Plan is the consolidated Regional Policy Statement, Regional Plan and Regional Coastal Plan. It has been described as a "one-stop-shop" regional planning document that defines how the natural and physical resources of the region will be cared for and managed by Horizons together with territorial authorities, iwi and hapū, and the community.

The One Plan has an overarching focus on four keystone environmental issues: surface water quality degradation; increasing water demand; unsustainable hill country land use; and threatened indigenous biodiversity. The significant interconnection between the four keystone issues in particular was recognised when the One Plan was introduced and ultimately confirmed, and it was anticipated that work on one would contribute to progress on the other three. The identification of resource management issues of significance to iwi and hapū of the region are also highlighted. These issues and related provisions are all set out in the Regional Policy Statement (One Plan Part I) along with the objectives, policies and methods that are intended to address them.

The Regional Plan (One Plan Part II) specifies controls on resource use, setting out the framework of rules, standards and conditions to manage effects of activities on natural resources. The level of regulation – ranging from permitted activities which can be carried out without resource consent provided standards and conditions can be met, through to prohibited activities which may not occur at all – is commensurate with the environmental risks and the level of certainty about how they can be managed.

Across the breadth of activities the One Plan covers, provisions generally apply to all parts of the region (with the notable exceptions being targeted catchments where existing intensive farming land uses are regulated, and some activities only regulated in the coastal marine area). The



Regional Policy Statement also allocates responsibility for achieving some objectives specifically to the regional council, territorial authorities, or both levels of local government.

Section 3.4.2 (below) goes on to describe how the One Plan RPS provides direction to territorial authorities on some specific matters relating to urban development.

3.4.2. One Plan Part I – the Regional Policy Statement

Chapter 3 of the operative One Plan RPS addresses relevant provisions that link to this topic:

- Objective 3-3: The strategic integration of infrastructure with land use
- Objective 3-4: Urban growth and rural residential subdivision on versatile soils
- Policy 3-4: The strategic integration of infrastructure with land use
- Policy 3-5: Urban growth and rural residential subdivision on versatile soils

Provision	Outcome sought
Objective 3-3: The strategic integration of infrastructure with land use	Objective 3-3 seeks to avoid unplanned urban development (such as that initiated by private plan changes to district plans) which could result in the piecemeal and inefficient provision of infrastructure.
Policy 3-4: The strategic integration of infrastructure with land use	Policy 3-4 directs TAs to strategically plan for urban development, to avoid issues associated with piecemeal development.
Objective 3-4: Urban growth and rural residential subdivision on versatile soils	Objective 3-4 and Policy 3-5 seek to protect, where appropriate, highly versatile soils from irreversible loss under subdivision and fragmentation. NOTE: No changes to Objective 3-4 and Policy 3-5 are included in the PPC.
Policy 3-5: Urban growth and rural residential subdivision on versatile soils	

Responsibility for these functions has been allocated to territorial authorities in the region.

Objectives, policies and methods set out in other chapters of the RPS also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values. As noted earlier, these wider provisions have not been included in the scope of PPC and will be addressed as part of the next suite of plan reviews.

3.4.3. One Plan Part II – the Regional Plan

The Regional Plan specifies the regulatory controls on the use of natural and physical resources through objectives, policies and regional rules.

The Regional Plan does not include provisions to give effect to Regional Policy Statement Objectives 3-3 and 3-4, Policies 3-4 and 3-5 because responsibility for this function has been allocated to territorial authorities in the region.

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3.4.4. Plan changes and amendments

Since the One Plan was made operative in 2014, it has been updated through plan amendments and changes.

Plan Change / Amendment	Outcome
Plan Change 1 (2016)	Minor amendments to the Regional Plan to insert a new policy and consequential amendments, as directed by the National Policy Statement for Freshwater Management 2014
Plan Amendment 1 (2018)	Regional Plan and Glossary amended to comply with the National Environmental Standard for Plantation Forestry
Proposed Plan Change 2	Plan Change 2 seeks to improve the workability of the One Plan provisions that manage existing intensive farming land uses (dairy farming, commercial vegetable growing, cropping and intensive sheep and beef) in target water management sub-zones. The Plan Change is still in a statutory process. The decision of the Hearing Panel was adopted in April 2021; it has been appealed to the Environment Court.

3.5. Other methods

In addition to the regulations and other methods set out in the One Plan, Horizons has employed non-regulatory approach to address 'the strategic integration of infrastructure with land use and urban growth' and 'rural residential subdivision on versatile soils'. This includes agreements and protocols; funding and assistance; research, monitoring and reporting; education; and advocacy.

4. Proposed Plan Change

Changes to the RPS to implement to the NPS UD will involve:

- Introducing new objectives and policies to enable more land and infrastructure supply, provide for intensification and where appropriate, expansion out of urban centres, and which contribute to well-functioning urban environments.
- Include policies to implement the Treaty of Waitangi (Te Tiriti o Waitangi).
- Provide greater policy support for intensification where identified criteria are met.
- Insert housing bottom lines for PNCC as the tier 2 local authority.

A review of the RPS and regional plans (in effect, the One Plan) identified that the current objective and policy is not working effectively in managing urban growth within the respective districts. The provisions do not recognise well-functioning urban environments and are not responsive to out of sequence development. Further detail is also required around climate change resilience, and incorporating resource management issues of significance for Māori. The review also illustrated that Objective 3 and its policies (relating to urban development) were being implemented with mixed success through the district plans within the Region.

The NPS UD only applies to 'urban environments' as defined by the NPS UD (urban areas that are part of a housing and labour market of at least 10,000 people). Some provisions apply to all urban environments, while some only apply to tier 1 and 2 urban environments. As discussed below, the scope of the PPC is limited to providing for well-functioning urban environments, not more broadly, urban communities, as sought by some submitters through consultation.





5. Consultation

Consultation with stakeholders, iwi and hapū, and local authorities has been undertaken as part of this plan review process. This section provides a brief overview of consultation and engagement, including the timeline and methods used. It summarises the key themes of the feedback and provides more detailed analysis of matters raised that led to a reassessment of and/or changes to the proposal.

5.1. Stakeholder and community consultation

During the preparation of plan changes, Horizons is required to consult with specific groups, including the Minister for the Environment and any other affected Ministers, and affected local authorities. It may consult any other group or individual.

The following is a summary of the primary engagement undertaken in preparing Proposed Plan Change 3:

Stakeholder	Timeframe	Methods
Minister for the Environment	August 2021 and April 2022	A letter inviting input prior to drafting, then a second letter
Other Ministers where a potential interest was identified: Minister of Conservation Minister of Housing Minister for Economic and Regional Development Minister for Infrastructure Minister for Social Development and Employment Minister of Agriculture Minister of Education Minister of Health Minister of Housing Minister of Transport	August 2021 and April 2022	sharing a first draft of the proposed plan change and inviting comments to assist with further development.
Territorial Authorities	August 2021 and April 2022	
Greater Wellington Regional Council	August 2021 and April 2022	
Stakeholder/industry/sector/ environmental groups/NGOs	August 2021 and April 2022	

In addition, Council officers met with Horizons (Council) three times since September 2021 to update and confirm the planning approach and seek feedback as to issues of concern or requiring attention. Further detail of the engagement undertaken is attached as **Appendix B**.

Common themes in the feedback from engagement have been summarised below:

PPC 3 Urban Form and Development



Date	Group or organisation	Feedback received – key points	Response
May 2022	Territorial authorities	Some interest in a more regional flavour to the wording of the draft provisions. This would require more regional specific consultation with key parties. Without a more local focus, consider striping PPC back and allowing TAs to (for the most part) rely on the NPS UD for direction. Consider adding a new definition (e.g., 'well-functioning communities') that captures all settlements, even smaller ones – and where appropriate apply the provisions to these as well. Concern that reliance on 'documented demand' could be counter-productive, as planning processes should be proactive. The importance of planning for infrastructure was reinforced. Palmerston North City Council staff requested that the housing bottom lines include a breakdown with specific targets for infill, greenfield and rural/rural-residential. Note: A number of conversations were also held with staff from Whanganui District Council. These discussions occurred jointly with Te Runanga o Tupoho representatives and are outlined in Section 5.2 below.	This PPC is limited to what is required to give immediate effect to the NPS UD and where there are matters relating to urban growth (directly or indirectly) already addressed in the RPS provisions, these have been preserved pending further, substantive review. The focus on PPC is on urban environments, as directed by the NPS UD, although responsive planning provisions have also been included. Amendments were made in consideration of feedback regarding 'documented demand' (note: this is still referred to in places, in line with the intent of the NPS UD). The importance of planning for infrastructure is noted and is reinforced through the PPC. No breakdown of specific targets has been included within the RPS. This level of detail is not directed by the NPS UD and could have unintended consequences. It is considered that the bottom lines are sufficient, informed by the HBA, and a footnote has been included in this regard. This provides flexibility for PNCC and Horizons.
May 2022	Infrastructure providers	Largely supportive of the PPC. The draft provisions referred to 'associated infrastructure', but it was unclear what 'associated' means. A couple of other minor suggestions were put forward, such as providing	The reference to 'associated' is removed and reliance on NPS UD provisions instead. Other comments were noted, however, no further changes were made as it was considered that the



Date	Group or organisation	Feedback received – key points	Response
		additional references to infrastructure, referring to climate change adaption and referring to iwi settlement documents.	proposed provisions provide for the other outcomes.
October 2021, March 2022	Councillors	Supportive of provisions that align with the objectives and policies of the NPS UD, particularly around issues such as: -Including provisions that will support outcomes associated with the notion of '20 minute communities -Enabling intensification -Climate adaptation and energy efficiency -Strategic planning for infrastructure Some discussions were also had about the scope of the plan change (e.g., whether it should review highly productive land provisions, natural hazard provisions, etc.).	This feedback aligns with the objectives and policies of the NPS UD and is reflected in the PPC. This PPC is limited to what is required to give immediate effect to the NPS UD and where there are matters relating to urban growth (directly or indirectly) already addressed in the RPS provisions, these have been preserved pending further, substantive review.
October 2021, May 2022	Waka Kotahi	Largely supportive of the PPC. Their feedback included recommendations to add additional references to "well-functioning urban environments" and the need to integrate land-use and transport.	Some minor amendments were made in response, including strengthening wording around: - planning for infrastructure, - creating or maintaining quality urban environments that are well connected by a choice of transport modes, - making reference to spatial planning, and - using the defined term 'centre zone'. Other comments were noted, however, no further changes were made as it was considered that the proposed provisions provide for the other outcomes.



5.2. Engagement with iwi and hapū

Schedule 1 RMA requires, as a minimum, Horizons to formally consult with tangata whenua that may be affected by the preparation of the proposed policy statement or plan, through iwi authorities.² This must include all of the following actions:³

- (a) considering ways in which it may foster the development of iwi authorities' capacity to respond to an invitation to consult;
- (b) establishing and maintaining processes to provide opportunities for those iwi authorities to consult it;
- (c) consulting with those iwi authorities;
- (d) enabling those iwi authorities to identify resource management issues of concern to them; and
- (e) indicating how those issues have been or are to be addressed.

Prior to notification, Horizons must:⁴

- (a) provide a copy of the draft proposed policy statement or plan to iwi authorities previously consulted under clause 3;
- (b) allow adequate time and opportunity for those iwi authorities to consider the draft and supply advice; and
- (c) have particular regard to any advice received before notifying the plan change.

The approach to iwi engagement on the PPC was also in accordance with advice from Horizons Policy Advisors - Iwi and Hapū Relationships. There were three key milestones (plus additional engagement where an interest was expressed):

- (a) Initial engagement was undertaken at the start of September 2021; a letter was distributed to Horizons' iwi and hapū contact list to invite participation prior to preparation of the PPC. The letter noted how the NPS UD has particular relevance to iwi/Māori. Further contact was made with iwi and hapū with an identified interest in Tier 2 and Tier 3 urban environments shortly afterwards, to reiterate the invitation to participate.
- (b) A second letter was sent to the iwi and hapū contact list in April 2022, sharing a first draft of the PPC and inviting input to assist Council officers with further development of the provisions. It was emphasised that "the NPS UD specifically requires planning decisions that enable a variety of homes so Māori may 'express their cultural traditions and norms'" and "when reviewing the enclosed draft, you may wish to consider how well we have addressed issues of concern to Iwi/Māori".
- (c) A third letter was sent to the iwi and hapū contact list in June 2022 to share an updated version of the draft PPC and inviting further input in accordance with the RMA Schedule 1 Clause 4A requirement. A period of six weeks was provided for responses.

Copies of the three letters are included as **Appendix C**.

Section 32(4A) requires that this evaluation report include summaries of all advice received from iwi authorities concerning the proposed plan change and the response to that advice, including any proposed provision intended to give effect to the advice. The following is a summary of the advice received from iwi authorities specific to the draft and proposed provisions evaluated in this report:



² Clause 3(1)(d).

³ Clause 3B.

⁴ Clause 4A.

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Iwi Authority	Advice received	Response
Te Runanga o Tupoho	Numerous discussions occurred during the pre-notification period, as outlined in Appendix B . Many of these discussions also involved staff from Whanganui District Council (at the request of Te Runanga o Tupoho representatives). During some of the initial discussions, key topics included:	
	 -Taiao (environment) is to be at the forefront of thinking – decision making must enhance taiao. -Stormwater needs to be considered holistically – this could involve stormwater management plans. -Te Runanga o Tupoho also raised questions regarding the scope of the plan change and questioned its ability to be effective given how the proposed provisions are quite high level. 	Officers shared the Gap Analysis that had been prepared to inform the preparation of PP3 (Appendix D) with Te Runanga o Tupoho to provide more context regarding the proposed scope - including how the Regional Policy Statement must be read as a whole, not each chapter in isolation. There will still be provisions in those other sections that will remain relevant pending further, more fulsome review of the RPS. The role of the Regional Policy Statement in relation to the role of District Plans was also discussed.
	During a later discussion in July 2022 (also involving a staff member from Whanganui District Council), the key topics were:	
	- More direction in provisions around who is responsible to implement them.	Some additional direction has been provided in the s 32 report (at section 3.2.2) around responsibilities, and guidance is also provided in the methods. It is not considered necessary for the objectives and policies themselves to state responsibility, unless it is very specific – for example, the PNCC District Plan for enabling growth to meet housing bottom lines.
	-Support for "compact" urban environments.	Noted/provided for under PPC.
	-The importance of the Regional Public Transport Plan.	Noted/provided for under PPC.



Iwi Authority	Advice received	Response
	-Greenfield development vs infill development. Greenfield development should be supported by evidence - e.g., is it due to lack of infill capacity, climate change adaption?	The following addition to the PPC (under Methods) has been made: "ensure greenfield development is supported by sound evidence (e.g. due to lack of infill capacity, climate change adaption)"
quality are not very strong (quite voluntary). Would rather strengthen these requirements now and not wait for freshwater plan change. What about te mana o te wai?		Addressing water quality is a key priority for Horizons and is being progressed separately through the Oranga Wai work programme, which will result in a freshwater plan being notified in 2024. The freshwater plan will involve changes to the RPS and regional plan (both components of the One Plan). In the meantime, decision makers still need to refer to the NPS-FW and te mana o te wai (as far as they can practicably do so).
	- Could there be provisions regarding stormwater capacity/demand management?	There have been the following additions to the PPC (under Methods):
	-A discussion about infrastructure - development contributions policies can be a method to achieve the objectives.	"Territorial Authorities* may use methods such as Development Contributions Policies and Stormwater Management Plans to ensure the coordinated and efficient provision of new development, development infrastructure* and additional infrastructure*"
	- A discussion about using stronger wording than "promoting resilient design and construction methods" (in UFD-P8 of the PPC wording).	We have changed "promoting" to "ensuring" in UFD-P8 of the PPC wording, in line with the feedback received.
Muaūpoko Tribal Authority (MTA) (Note: MTA is governed by a	MTA provided a written response after they received a draft of the PPC (in accordance with the RMA Schedule 1 Clause 4A requirement). Their written response included a table with comments and identifying the relief sought. A summary of feedback is provided below:	



Iwi Authority	Advice received	Response
board of elected representatives from Ngai Te Ao, Ngārue, Ngāti Hine, Ngāti Pāriri, Ngāti Tamarangi, Ngāti Whanokirangi and Punahau)	 The unsustainable use of versatile soils and productive land may have significant adverse effects on water quality and mauri, protected by the National Policy Statement for Freshwater (NPSFM) and HRC-OP. Circumstances must be considered where rural-residential subdivision may be appropriate and a better use of land. 	This PPC is limited to what is required to give immediate effect to the NPS UD and where there are matters relating to urban growth (directly or indirectly) already addressed in the RPS provisions, these have been preserved pending further, substantive review. When the NPS HPL is released, this issue can be considered holistically and with all relevant information before Horizons. Further work will be required at this point in time. In the interim there is still policy support for the protection of versatile soils and productive land. The expansion of urban development is also more constrained when having regard the minimisation of urban sprawl, and use of productive land.
	• Redrafting is required to ensure the plan change is consistent with the National Policy Statement for Urban Development 2020 (NPS UD), specifically Policies 1 and 9.	As per below.
	• Policy 1 should be redrafted to ensure Māori are enabled to undertake their cultural practices and norms, as part of a well-functioning urban environment.	The wording in UFD-P7 and Method 2 of the PPC, has been changed in line with the feedback received.
	While the objective UFD-O3 partially addresses this, there is no relevant policy to ensure this will be achieved.	A 'well-functioning urban environment' has been included as a defined term (in accordance with the NPS UD definition). This definition explicitly refers to enabling cultural practices and norms. This means UFD-O3 also addresses this concern.
	• Policy 9 should be included, as written in the NPS UD, in full to ensure its intent is not diluted.	The objective and policy have been amended to reflect the NPS UD more fulsomely (see UFD-05 and UFD-P9). It is not the intention of Horizons to dilute the intent of these requirements/policy direction of the NPS UD.
	• MTA think it is important to include further acknowledgement of tangata whenua and tangata whenua communities in the scope and background of this chapter to ensure our issues are adequately considered and addressed.	Additional wording has been included in the scope and background section of the PPC, to note that: <i>Objectives, policies and methods set out in other chapters of this</i> <i>Regional Policy Statement also provide guidance on achieving a</i>



Iwi Authority	Advice received	Response
		built form that relates well to its surrounding environment, on matters including, but not limited to, resource management issues of significance to hap \bar{u}^* and iwi*.
	• The Plan Change as drafted does not provide protection for our sites of significance such as wāhi tapu. Policy direction must be explicit.	The need to protect sites of significance such as wāhi tapu has been included as a criterion when considering intensification and expansion of urban environments. There is also provision for s 6(e) matters and sites of significance in Chapter 2 of the operative One Plan.
	• Specific mention of enabling papakāinga is supported, however, marae are also important and should be recognised.	The wording in UFD-P6 of the PPC has been amended to also includer Marae, in line with the feedback received.
Te Ao Turoa Environmental Centre (on behalf of Rangitāne o Manawatū Iwi)	Te Ao Turoa Environmental Centre provided a written response after they received a draft of the PPC (in accordance with the RMA Schedule 1 Clause 4A requirement). Their written response included a table with comments and identifying the relief sought. A summary of feedback is provided below:	
	Redrafting is required to ensure the plan change is consistent with the National Policy Statement for Urban Development 2020 (NPS UD), specifically Policies 1 and 9.	As per below.
	Policy 1 should be redrafted to ensure Māori are enabled to undertake their cultural practices and norms, as part of a well- functioning urban environment. While the objective UFD-O3 partially addresses this, there is no relevant policy to ensure this will be achieved.	We have changed the wording in UFD-P7 and Method 2 of the PPC, in line with the feedback received. A 'well-functioning urban environment' has been included as a defined term (in accordance with the NPS UD definition). This definition explicitly refers to enabling cultural practices and norms. This means UFD-O3 also addresses this concern.
	Policy 9 should be included, as written in the NPS UD, in full to ensure its intent is not diluted.	The objective and policy have been amended to reflect the NPS UD more fulsomely (see UFD-05 and UFD-P9). It is not the



Iwi Authority	Advice received	Response
		intention of Horizons to dilute the intent of these requirements/policy direction of the NPS UD.
	Needs to be further acknowledgement of tangata whenua and tangata whenua communities in the scope and background of this chapter to ensure our issues are adequately considered and addressed.	Additional wording has been included in the scope and background section of the PPC, to note that: Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, resource management issues of significance to hapū* and iwi*.
	The Plan Change as drafted does not provide protection for our sites of significance such as wāhi tapu. Policy direction must be explicit.	The need to protect sites of significance such as wāhi tapu has been included as a criterion when considering intensification and expansion of urban environments. There is also provision for s 6(e) matters and sites of significance in Chapter 2 of the operative One Plan.
	Specific mention of enabling papakāinga is supported, however, marae are also important and should be recognised.	The wording in UFD-P6 of the PPC has been amended, in line with the feedback received.



This advice has been considered and given particular regard. Horizons has made the following changes in response to this advice:

1. the addition of the following wording in the 'Scope and Background' section of the PPC:

"Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values; resource management issues of significance to hapū* and iwi*", and

2. amendments to the 'Policies' and 'Methods' sections of the PPC, as outlined in the above table.

The Gap Analysis (included as **Appendix D**) provides additional context to explain the scope of the PPC. The Gap Analysis identifies instances where potential provisions have not been included in this PPC because existing provisions already apply. It also considers whether changes to the Regional Policy Statement would create a conflict with existing provisions and the need for the matters to addressed together as part of wider review of the RPS.

6. Key Resource Management Issues

The review of the current One Plan, RPS provisions has been informed by planning review, assistance from internal and external experts, councillor and staff workshops, and industry, stakeholder, community, and iwi and hapū engagement. This has been used to identify and assess the environmental, economic, social and cultural effects arising from the status quo (the existing RPS) and those that are anticipated from the implementation of the proposed provisions.

When considering housing supply, Horizons relied on PNCC's 'Housing Capacity Assessment Report – June 2021'.⁵

6.1. Effectiveness and efficiency of operative provisions

Council officers have reviewed the effectiveness of the RPS through a 'gap analysis' to consider whether, and to what extent, it already addressed the matters set out in the NPS UD. In order to align the RPS with the NPS UD more detail and guidance was required with regard to intensification, well-functioning urban environments, resilience to climate changes, and iwi and hapū involvement in planning decisions (although there is some direction in Chapter 2). Equally, the review showed that some of the other matters identified in the NPS UD as contributing to a "well-functioning urban environment" were already addressed (to varying extents) in other sections of the RPS, and could be addressed as part of a later, planned review of the One Plan.

Existing provisions partially address the issue by directing TAs to strategically plan for urban development, in order to avoid issues associated with piecemeal, fragmented development. However, a review of district planning strategies suggests mixed success in meeting Objective 3-3, and more could be done to secure good urban development outcomes in the region. Many local authorities in the region are actively addressing their urban growth issues through a range of plan and strategic initiatives. The RPS is a key document in the hierarchy of planning instruments that influences the context within which the territorial authorities are seeking to provide for growth. The role of the RPS is to provide for well-planned urban growth, while still providing flexibility for

⁵ A copy of this report is available at <u>https://www.pncc.govt.nz/Council-city/Official-documents/Research/Urban-development</u> .



territorial authorities (and developers) to deliver local, innovative solutions with high-quality urban outcomes.

The existing provisions are also inadequate in light of new national policy direction around urban development. Existing provisions fail to meet the minimum requirements of the NPS UD. As a minimum there is a requirement for the RPS to include housing bottom lines for Tier 2 Urban Environments (Clause 3.6(2)(a)) and a policy outlining the criteria for where local authorities must be responsive to plan changes (Clause 3.8(3))

In addition, policies of the NPS UD identify that the planning system as a whole must enable certain outcomes. In particular, Policies 3, 4, and 5 mention regional policy statements alongside district plans as being required to 'enable' certain density and height outcomes.

The above considerations have played a vital role in driving this PPC.

6.2. Issues identified

Based on the analysis and consultation outlined above, the following resource management issues have been identified:

Issue	Comment	Proposed response
Issue 1: Strategic planning and land use Poorly planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, development infrastructure and additional infrastructure. This can create adverse environmental effects and make it more difficult for development to meet the needs of current and future communities.	The current One Plan provisions do not adequately provide direction for all the matters the NPS UD addresses. The NPS UD has introduced new concepts (such as well functioning urban environments) and provides more specific direction around urban resilience to the effects of climate change. Challenges also currently exist around urban development matters such as meeting housing demand and providing adequate infrastructure.	Inclusion of targeted provisions to implement the objectives and policies of the NPS UD and to ensure urban development is strategically planned for to meet the needs of current and future communities.
Issue 2: Adverse effects* from urban growth and rural residential subdivision* on versatile soils Urban growth and rural residential subdivision* ("lifestyle blocks"), on versatile soils may result in those soils no longer being available for use as production land. These development pressures often occur on the	This is an existing issue identified in the RPS, that is applicable to the 'Urban Form and Development' Chapter.	No changes to the existing versatile soils provisions are being proposed in this PPC.



Issue	Comment	Proposed response
fringes of some of the Region's urban areas.		
Issue 3: Demand for housing, business land, infrastructure and community services A growing population increases demand for housing, business land, infrastructure and community services.	The current One Plan provisions do not adequately provide direction to respond to demand for housing, business land, and infrastructure in urban environments.	Inclusion of targeted provisions to implement the objectives and policies of the NPS UD. Provisions to ensure this demand is sufficiently planned for, so as not to adversely impact the quality of urban environments, the quality of life for residents and communities and the quality of the natural environment either as part of PPC or as already provided in the RPS. Provisions also seek to reduce increases in the use of non- renewable resources and greenhouse gas emissions.

7. Approach to Evaluation7.1. Evaluation of scale and significance

The level of detail undertaken for this evaluation has been determined by an assessment of the scale and significance of the environmental, economic, social and cultural effects anticipated from introducing and implementing the proposed provisions (i.e., objectives, policies and methods). Key considerations that informed this assessment included whether the provisions:

- Involve a matter of national importance;
- Are the subject of an NPS;
- Are consistent with national or regional direction through plans, other strategies or guidance;
- Involve a minor or major change to the current provisions;
- Will affect iwi and hapū and are consistent with iwi strategies and planning documents;
- Are controversial and / or will affect groups with specific interests or a large number of residents in the region;
- Are consistent with current best practice throughout New Zealand
- Will significantly reduce opportunities or restrict options for land or natural resource use; and
- Are likely to have a major financial impact on individuals/communities/businesses due to compliance and or administrative costs.

Based on this assessment, the scale and significance of the proposed provisions are considered to be low to medium, for the following reasons:

• The purpose of the PPC is to give effect to the NPS UD and planning decisions must give effect to the NPS regardless of what the RPS contains. However the importance of "well-functioning urban environments' means it is considered important for the RPS to reflect this national approach and provide clear direction to the territorial authorities;



- The scope of the PPC does not go beyond the intent of the NPS UD;
- The PPC will only result in a minor-moderate change to the operative One Plan, and will not result in any changes to the Regional Plan;
- The PPC is not inconsistent with iwi planning documents,
- The PPC has not generated a high level of stakeholder interest during pre-notification engagement, and
- Iwi and hapū in the region have been engaged as part of the proposed plan change process with feedback received, considered and accounted for as part of the PPC.

Consequently, a high level evaluation of these provisions has been identified as the appropriate approach in this report.

The evaluation assessment is included as Appendix E.

Proposed One Plan Provisions Objectives, Policies and Methods 8.1. Overview of provisions

The proposed provisions amend some existing and insert additional provisions in Chapter 3 of the operative One Plan RPS (or the Urban Form and Development Chapter under the National Planning Standards). These provisions should be referred to in conjunction with this evaluation report.

In summary, the proposed provisions/amendments comprise of:

- Regional Policy Statement
 - \circ $\;$ Amending the scope, background and issues for urban form and development.
 - Amending one operative One Plan objective (RPS Objective 3-3: 'The strategic integration of infrastructure with land use'),
 - Adding three new objectives,
 - Amending one operative One Plan policy (RPS Policy 3-4: The strategic integration of infrastructure with land use),
 - Adding six new policies,
 - \circ $\;$ Adding four new methods, and
 - \circ $\;$ Adding 22 new defined terms.

Together, these provisions are proposed to give effect to the NPS UD and to align with its objectives. This approach (referred to as the "proposed objectives") provides amendments to the RPS to ensure the compulsory requirements of the NPS UD are met, to provide for "well-functioning urban environments", responsiveness, resilience to climate change, and to account for the Te Tiriti o Waitangi in planning decision-making. It does not extend to revisiting all of the matters which contribute to well-functioning urban environments as set out in other sections of the RPS (hazards, transportation, and the like) as these sections will be read alongside the Urban Form and Development Section and are to be the subject of further review over time.

Note: As proposed, the Urban Form and Development Chapter will also include the retention of one operative One Plan objective and one operative One Plan policy in relation to urban growth and rural residential subdivision on versatile soils.

• Regional Plan

 $_{\odot}$ N/A – no changes are proposed to the Regional Plan.

A full copy of the proposed plan change provisions, marked up on the affected One Plan chapter (using the National Planning Standards format), is attached as **Appendix A**. The changes include



the addition of 22 defined terms to the One Plan. These terms have been defined in accordance with definitions provided in the NPS UD. These terms are also included in **Appendix A**.

9. Evaluation of Proposed Objectives

This section evaluates the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the RMA (as required by section 32(1)(a)). The evaluation considers existing, proposed and reasonable alternative objectives, and assesses their relevance, reasonableness and achievability.

Alternatives to the proposed objectives have been considered and investigated. The 'do nothing' option was considered; however, if this option were adopted, the RPS would be inconsistent with the requirements of the NPS UD and would not 'give effect' to it. The option has therefore not been considered in further detail within the report. Rather, the alternatives consist of:

Alternatives	Comments
Alternative 1 – Minimum NPS UD Requirements only, plus retain the existing operative RPS Objective 3-3: 'The strategic integration of infrastructure with land use'	This option would be limited to inclusion of the specific compulsory requirements for the RPS as articulated in the NPS UD. This would be a Table containing the housing bottom lines for Tier 2 Urban Environments (Clause 3.6(2)(a)) and a policy outlining the criteria for where local authorities must be responsive to plan changes (Clause 3.8(3)).
Alternative 2 – Expand the scope of the PPC, to address all environmental issues arising from urban development	This option would involve more substantial changes to the RPS following review of other chapters of the operative RPS that also provide guidance on achieving well-functioning urban environments. These matters include, but are not limited to, energy, infrastructure, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values. A broader review of the RPS is programmed including the freshwater planning process which will enable a more integrated review of all of these matters in light of national direction (current and pending) and supported by evidence.



9.1. Evaluation of Objectives

Note: Objective UFD-O2 'Urban Growth and rural residential subdivision on versatile soils' has been excluded from the evaluation as the PPC is not seeking to change the operative RPS provision (operative One Plan Objective 3-4).

UFD-O1 Strategic planning and urban development UFD-O3 Urban form and function UFD-O4 Urban development and the Treaty of Waitangi (Te Tiriti o Waitangi) UFD-O5 Urban development and climate change

General intent:

Proposed Objectives:

The intent of the proposed objectives is to give effect to the objectives of the NPS UD. The status quo (the existing operative RPS Objective 3-3: 'The strategic integration of infrastructure with land use') fails to meet the requirements of the NPS UD.

The intent is also to set the policy framework that will provide higher order direction to district plan development and plan changes. This is required because the status quo does not address the new terminology and concepts introduced by the NPS UD and provides very limited higher order direction which could potentially result in poor urban planning and environmental outcomes and limited land use integration.

Other potential objectives

Alternative 1: Only include compulsory requirements of the NPS UD, plus retain the existing operative RPS Objective 3-3: 'The strategic integration of infrastructure with land use'

The PPC would be limited to inclusion of the specific compulsory requirements for the RPS as articulated in the NPS UD. This would be a Table containing the housing bottom lines for Tier 2 Urban Environments (Clause 3.6(2)(a)) and a policy outlining the criteria for where local authorities must be responsive to plan changes (Clause 3.8(3)).

Alternative 2: Expand the scope of the PPC, to address all environmental issues arising from urban development

This option would require an evaluation and review of existing provisions in other chapters of the operative RPS that also provide guidance more generally on matters contributing to well-functioning urban environments, environmental effects arising from urban development, responsiveness planning, and Te Tiriti o Waitangi. This would be on matters including, but not limited to, energy, infrastructure, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values. An integrated review of these matters, with supporting evidence, is necessary to ensure a coherent response and to avoid inconsistency/conflict within the RPS.

Other relevant objectives in the Plan:



Objectives set out in other chapters of the RPS also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure and transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values. The relationship of these objectives with the proposed provisions, and their contribution to urban development, is discussed in **Appendix D – Gap Analysis**.

	Proposed objectives	Alternative 1	Alternative 2
Comment:	 The proposed objectives give effect to the NPS UD, which is presumed to give effect to Part 2 of the RMA. Proposed objectives align with other matters in Part 2 of the RMA, including in relation to: -providing for the diverse and changing needs of people, communities, and future generations -enabling people and communities to provide for their health and wellbeing -promoting sustainable management of natural and physical resources. This approach indicates that the matters informing well-functioning urban environments are listed as a minimum, thereby not impeding Alternative 2. 	This alternative would give effect to the NPS UD, which is presumed to give effect to Part 2 of the RMA. It provides limited regional level direction, however, which could potentially result in poor urban and environmental outcomes. A review of district planning strategies suggests mixed success in meeting Objective 3-3. Further guidance would provide for well-planned and supported urban growth which in turn leads to greater range of housing, better meeting of market demand, and well-functioning urban environments. This approach would not provide for these outcomes.	This alternative would give effect to the NPS UD, which is presumed to give effect to Part 2 of the RMA, but it would result in a much more substantial PPC. This approach would encounter difficulties as substantive evaluations of a number of applicable topics in the operative One Plan have yet to be undertaken. The need for any changes to strengthen existing provisions in other chapters should be considered following review of the effectiveness of the existing provisions in addressing key issues.

Relevance:

Addresses a relevant resource management issue The proposed objectives address the management of physical resources. Objectives seek to ensure that physical resources are managed in accordance with mandatory national direction. The existing operative RPS Objective 3-3 seeks to provide outcomes relating to effective and efficient infrastructure provision. The mandatory requirements

This approach would also address the management of physical resources.



	of the NPS UD would address housing	
	bottom lines.	
The objectives assist Council in carrying out its functions under S30(1)(a), (ba) and (gb).	This approach would also assist Council in carrying out its functions under S30(1)(a), (ba) and (gb).	This approach would also assist Council in carrying out its functions under S30(1)(a), (ba) and (gb).
The objectives give effect to the NPS UD. The PPC goes beyond the minimum requirements of the NPS UD to set a policy framework that provides contextual regional direction to territorial authorities. This approach is considered more effective than 'Alternative 1', as the PPC integrates the policies of the NPS UD into the One Plan to assist the planning system as a whole to enable directed outcomes. The objectives have been prepared with regard to other relevant plans, policies and strategies, providing vital regional context to the objectives.	This approach would meet the minimum requirements of the NPS UD. This approach is considered to be less effective than the PPC, as simply drawing down the provisions of the NPS UD would provide only a limited objective and policy framework with little regional context, and the management of plan development and plan changes would also proceed with very limited regional direction - potentially resulting in poor outcomes and limited integration.	This approach would achieve the same outcomes as the proposed approach in relation to giving effect to the NPS UD, although it would ensure that matters contributing to well-functioning urban environment are better integrated with the NPS UD provisions across all sections of the RPS and the One Plan as a whole. This may not be necessary if the short term given there are already existing provisions in the operative One Plan that provide additional guidance on achieving a built form that relates well to its surrounding environment, including hazards (which indirectly address climate change and greenhouse emissions). However, the approach would also not be effective in the short term given current statutory and resource
	out its functions under S30(1)(a), (ba) and (gb). The objectives give effect to the NPS UD. The PPC goes beyond the minimum requirements of the NPS UD to set a policy framework that provides contextual regional direction to territorial authorities. This approach is considered more effective than 'Alternative 1', as the PPC integrates the policies of the NPS UD into the One Plan to assist the planning system as a whole to enable directed outcomes. The objectives have been prepared with regard to other relevant plans, policies and strategies, providing vital regional	out its functions under S30(1)(a), (ba) and (gb).in carrying out its functions under S30(1)(a), (ba) and (gb).The objectives give effect to the NPS UD. The PPC goes beyond the minimum requirements of the NPS UD to set a policy framework that provides contextual regional direction to territorial authorities.This approach would meet the minimum requirements of the NPS UD to set a policy framework that provides contextual regional direction to territorial authorities.This approach is considered to be less effective than the PPC, as simply drawing down the provisions of the NPS UD would provide only a limited objective and policy framework with little regional context, and the management of plan development and plan changes would also proceed with very limited regional direction - potentially resulting in poor outcomes and limited integration.



Usefulness:			
Guides decision- making	The proposed objectives provide clear guidance on, and expectations for, urban development and growth.	Drawing down the NPS UD objectives would provide limited a contextual objective and policy framework, and the management of plan development and district plan changes would also proceed with very limited regional direction.	This approach would also specify clear guidance on, and expectations for, urban development and growth.
Meets best practice for objectives	The objectives are consistent with good practice and clear in scope and intent.	A review of district planning strategies suggests mixed success in meeting Objective 3-3. Further guidance would provide for well-planned and supported urban growth which in turn leads to greater range of housing, better meeting of market demand, and well-functioning urban environments. This approach would not provide for these outcomes.	This approach could provide additional guidance on achieving a built form that relates well to its surrounding environment. However, the appropriateness of such objectives needs to be established following review of the effectiveness of the existing RPS provisions, and any relevant national direction (NPS- FW, for example). The work programme for this is planned. For now, there is some existing guidance in the RPS as to some of the other matters informing well-functioning urban environments, climate change and the te Tiriti o Waitangi.
Reasonableness:			
Will not impose unjustifiably high costs on the community / parts of the community	The proposal is not anticipated to impose any unreasonable costs on the community. Components of the proposal seek to improve housing affordability.	This alternative approach could impose additional, unnecessary costs on the community during district plan change and territorial authority consent processes, by failing to provide sufficiently clear direction.	This alternative approach is also not anticipated to impose any unreasonable costs on the community. It is envisaged that components of the proposal would seek to improve housing affordability. There is more cost



			involved in the breadth of review required for the RPS with associated plan change costs, and potentially additional implementation costs.
Acceptable level of uncertainty and risk	There is low uncertainty with this option. The objectives clearly align with the objectives of the NPS UD.	These objectives would clearly align with the objectives of the NPS UD. A review of district planning strategies suggests mixed success in meeting Objective 3-3. Further guidance would provide for well-planned and supported urban growth which in turn leads to greater range of housing, better meeting of market demand, and well-functioning urban environments. This approach would not provide for these outcomes.	Expanded objectives could align with the objectives of the NPS UD. However, a higher level of risk exists with this approach, due to the lack of evidence that currently exists to support it.
Achievability			
Consistent with identified tangata whenua and community outcomes	The objectives are considered consistent with provisions in relevant iwi planning documents and engagement outcomes. Proposed objective UFD-O4 specifically addresses urban development and the Treaty of Waitangi (te Tiriti o Waitangi).	This alternative approach would provide less contextual objective and policy framework than the proposed objectives. Plan development and plan changes would proceed with very limited regional direction. It would not provide the same level of guidance around issues of significance to Māori and the te Tiriti o Waitangi.	This alternative approach would be consistent with provisions in relevant iwi planning documents and engagement outcomes. It would require the scope of the plan change to be expanded to revisit existing provisions in the operative One Plan that provide additional guidance on the NPS UD matters, including iwi and hapū matters through Chapter 2. This would have benefits for Māori, although any review of Chapter 2 would need to occur alongside iwi and hapū.



Realistically able to be achieved within the	The objectives are considered to be readily achievable and able to be	This alternative approach is also considered to be readily achievable and	The resourcing requirements to implement this alternative approach	
Council's powers,	implemented within Council's function and	able to be implemented within Council's	within the required NPS UD	
skills and resources	expertise.	function and expertise.	timeframe is not readily achievable.	
			There is not sufficient capacity to	
			fast-track the evaluation of operative	
			One Plan provisions (the Section 35	
			evaluation programme) in the time	
			available. Further, there is already a	
			work programme for review of the	
			RPS, over the coming years.	

Overall assessment of the appropriateness of the proposed objectives

The proposed objectives achieve the purpose of the RMA and give effect to the NPS UD. They are anticipated to be more effective and efficient than the two alternatives, primarily because:

- They set the policy framework that will provide robust higher order direction to District Plan Development and Plan Changes,
- They best give effect to higher order directions,
- Alternative One is considered to be less effective as it fails to provide sufficient higher order direction for district planning, which could potentially result in poor urban and environmental outcomes and limited land use integration. It could also impose additional, unnecessary costs on the community during district plan change and territorial authority consent processes, by failing to provide sufficiently clear direction, and
- Alternative Two is considered to be less efficient as it unnecessarily expands the scope of the PPC (instead of utilising existing provisions in the operative One Plan that provide additional guidance on achieving a built form that relates well to its surrounding environment). In addition, this approach would not be supported by any evaluation of the effectiveness of a relevant provision in the operative One Plan.



10. Evaluation of provisions to achieve the Objectives

This section evaluates the policies and methods associated with each of the objectives.

10.1. Identification and assessment of options to achieve the objectives

The Council has, through the research, consultation, information gathering, and analysis undertaken in relation to this topic, identified and considered the following reasonably practicable alternative options in relation to achieving the objectives:

- Option 1 the proposed provisions
- Option 2 minimum NPS UD Requirements only, plus retain the existing operative RPS Objective 3-3: 'The strategic integration of infrastructure with land use'

The consultation input used to inform this process is outlined in section 5 above. The level of detail undertaken for the evaluation of the proposed policies and methods has been determined by the assessment of scale and significance in section 7.

In summary, these were considered to be the preferred option to be put forward for evaluation of their efficiency and effectiveness to achieve the objectives.

10.2. Evaluation of options

An evaluation of the options has been undertaken in relation to the costs, benefits and the certainty and sufficiency of information. This evaluation is to determine the effectiveness and efficiency of the approaches, and whether the preferred option is the most appropriate way to achieve the relevant objectives. It is informed by the consultation summarised in section 5 above.



10.3. Evaluation of proposed provisions to achieve Objectives

Note: Given the assessment of the scale and significance of the proposal, specific quantification of the costs and benefits in this report is considered neither necessary, beneficial nor practicable in relation to the PPC. This assessment also does not outline costs or benefits inherent to giving effect to the NPS UD. This is because Horizons is required to give effect to the NPS UD under s 55 of the RMA, and the costs and benefits of requiring local authorities to undertake that exercise have been assessed in the s 32 completed by the Minister for the Environment as part of the process of publishing the NPS UD. Instead, this report identifies more generally where any additional costs and benefits from the alternative approaches identified by Horizons may lie.

Option 1 – proposed provisions	Costs	Benefits	Effectiveness and efficiency
Policies	Environmental	Environmental	Effectiveness
UFD-P1: Integration of infrastructure with land use UFD-P2: Providing sufficient development capacity	No additional direct or indirect costs have been identified. Specific environmental costs will only arise when development enabled by the PPC proceeds, and they will be the subject of assessment at the time.	Promotes integrated, compact development that delivers high quality environmental outcomes. Includes provision for climate change and energy efficiency benefits. More specific environmental benefits will only arise when development enabled by the PPC proceeds, and they will be the subject of assessment at the time.	_
UFD-P3: Urban growth and rural residential	-	providing higher order direction for district plan development and plan changes, and is directed towards	
subdivision on versatile soils	Cost of implementing and complying with the plan change.	Maximises the development capacity of urban environments.	achieving the objectives of the NPS U
UFD-P4: Urban intensification and expansion	Costs of providing and maintaining infrastructure and amenities.	Provides greater flexibility, choice and opportunities to provide varied housing types, including more affordable	Efficiency
UFD-P5: Built forms		options. Urban environments will more effectively be able to	Co-ordinated and integrated urban development will occur, reducing the potential for inefficient use of natural and physical resources.
UFD-P6: Significant	Social	accommodate the demand for business land.	
development capacity criteria	No additional direct or indirect costs have been identified.	Social	
UFD-P7: Hapū and iwi involvement in urban		Provides greater flexibility, choice and opportunities to	
development	Cultural	provide varied housing types, including more affordable	
UFD-P8: Urban development and climate change	No additional direct or indirect costs have been identified.	options. Provides urban development outcomes that will benefit future generations.	
	Economic growth and employment costs		
<u>Methods</u>	No additional costs have been identified.	Cultural	
1 Monitoring and reporting		Planning decisions that enable a variety of homes so that Māori may express their cultural traditions and norms. Iwi	
2 Strategic planning		and hapū involvement is provided for in planning processes, with the protection of significant areas of	
3 District plans		significance.	
4. Advocacy			



Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions

e NPS rban ne It is considered that there is sufficient information to act as the proposed provisions give effect to the NPS UD and they set the policy framework that will provide higher order direction to District Plan Development and Plan Changes. The risk of not acting is high as the current RPS does not give effect to the NPS UD.

UD.

Economic growth and employment opportunities

Economic growth and employment opportunities anticipated to be increased due to ensuring sufficient development capacity exists in urban environments and creating and/or maintaining well-functioning urban environments.

Partially promotes integrated development that delivers

Existing provisions partially address the objectives by

directing TAs to strategically plan for urban development,

No additional direct or indirect benefits have been identified.

No additional direct or indirect benefits have been

Economic growth and employment opportunities

No additional opportunities have been identified.

to avoid issues associated with piecemeal development.

high quality environmental outcomes.

Benefits

Environmental

Economic

Social

Cultural

identified.

Effectiveness and efficiency

Option 2 – minimum NPS UD Requirements only, plus retain the existing operative **RPS Objective 3-3: `The strategic** integration of infrastructure with land use'

Policies

Minimum NPS UD Requirements

Operative One Plan Policy 3-4: The strategic integration of infrastructure with land use

<u>Methods</u>

N/A

Environmental

Costs

Lack of regional direction, potentially resulting in fragmented decision making and inconsistent environmental outcomes across districts.

Economic

Cost of preparing the plan change.

Cost of implementing and complying with the plan change.

Costs of providing and maintaining infrastructure and amenities.

Social

Well-functioning urban environments are less likely to be achieved. This results in less ability for people to have access to a variety of housing choices, community facilities and recreational opportunities.

Insufficiently planning for the needs of future generations.

Cultural

Planning decisions may be less likely to enable a variety of homes so Māori may express their cultural traditions and norms. No specific recognition of the principles of te Tiriti o Waitangi and the early involvement of iwi and hapū in urban planning. Does not respond to the issues identified in the cl 4A consultation undertaken through the PPC process.

Economic growth and employment costs



PPC 3 Urban Form and Development



Effectiveness

This approach would give effect to the NPS UD.

However, this approach would not be as effective in providing regional direction for district plan development and plan changes around urban growth and broad environmental and social benefits arising from intensification and expansion (where appropriate) of urban areas.

Efficiency No additional direct or indirect benefits have been identified.

This approach has less certainty in regard to achieving co-ordinated and integrated urban development that reduces the potential for inefficient use of natural and physical resources.

Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions

As previously stated, existing provisions partially address the issue by directing TAs to strategically plan for urban development, to avoid issues associated with piecemeal development. There is a risk that this option would fail to adequately provide regional direction for district plan changes. The risk of not acting is therefore high. This option may also reduce well-planned and supported urban growth which in turn leads to greater range of housing, better meeting of market demand, and wellfunctioning urban environments.

Economic growth and employment opportunities may not be as well catered for due to a less comprehensive approach to urban form and development.





11. Summary

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal, having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option, as:

- The proposed amendments achieve the purpose of the RMA and give effect to the NPS UD.
- They set the policy framework that will provide higher order direction to District Plan Development and Plan Changes, having regard to higher order documents.
- It provides for well-planned and supported urban growth which in turn leads to greater range of housing, better meeting of market demand (including affordability, and well-functioning urban environments which are resilient against climate change.
- It avoids additional, unnecessary costs on the community during plan change and consenting process, by providing more certainty around urban growth and development.
- It best accounts for the involvement of iwi and hapū and the te Tiriti o Waitangi principles in urban planning decision making, and further, addresses feedback from Māori on the PPC.

Overall, it is considered that the set of proposed provisions are the most appropriate given that the benefits outweigh the costs, and there are efficiencies to be gained from adopting these provisions. Conversely, the risk of not acting on these provisions could result in perpetuation of the implementation issues experienced with the current Operative One Plan approach, leading to inefficient use of the region's natural and physical resources and poor urban outcomes.

Appendix A - Proposed Plan Change Provisions

Urban Development Plan Change

Proposed provisions for public notification – October 2022

Key

ney	
One Plan wording to be retained	Black
One Plan wording to be removed	Black with strikethrough
New wording	Blue



PPC 3 Urban Form and Development

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*^ 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*^, 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)^* in planning decisions relating to *urban environments**.

Urban growth and rural residential *subdivision** on versatile soils

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

Issues

UFD-I1: The strategic integration of *infrastructure* withStrategic 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**. 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

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

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

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

Objectives

UFD-O1: The strategic integration of *infrastructure*^ with *land*^ useStrategic 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*^ and associated *infrastructure*^:

(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

Mā te mahere rautaki me te whakawhanake tāone:

(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 hapori me ngā whakatipuranga e heke mai nei mā te kounga 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

To ensure that *Territorial Authorities*^{*} consider the benefits of retaining Class I and II⁶ versatile soils⁷ for use as *production land*^{*} when providing for urban growth and rural residential *subdivision*^{*}.

UFD-O2: Te tupu o ngā tāone me te whakaahu whenua hei nohoanga taiwhenua, I runga oneone whai pūkenga

Kia hua ai ka whakāroarotia ngā painga o te pupuri tonu i ngā oneone whai pūkenga o te Momo I me te Momo II kia whakamahia hei whenua whakaputa hua i ngā wā e whakarato ana mō te tupu tāone me te wawaetanga whenua nohoanga taiwhenua.

UFD-O3: Urban form and function

The intensification and expansion of *urban environments**:

- (1) contributes to well-functioning urban environments* that
 - (a) enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future,
 - (b) increase housing capacity and housing choice,
 - (c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,
 - (d) are well connected by a choice of transport modes including *public transport**, and
 - (e) manage adverse environmental effects*.

(2) enable more people to live in, and more businesses and *community services** to be located in, areas of an *urban environment** where:

(a) it is in or near a *centre zone** or other area with many employment opportunities, or

(b) it is well-serviced by existing or planned public transport*, or

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

UFD-O3: Te āhua me te heinga o te tāone

Te kaha kē ake me te tipu haere o ngā taiao tāone:

(1) tautoko ana ngā tāiao tāone e pai haere ana



⁶ As identified in the Land Use Capability Classification system.

⁷ For general information purposes these soils largely comprise the following soil series: Egmont, Kiwitea, Westmere, Manawatu, Karapoti, Dannevirke, Ohakune, Kairanga, Opiki and Te Arakura.

(a) e whai wāhi ana ngā tāngata katoa, hapori mai, whakatipuranga mai kia pai tō rātou oranga ā-ōhanga, ā-ahurea, tō rātou hauora me te haumaru i āianei, ā, haere ake nei,

(b) kia nui atu ngā whare hei nohoanga me te nui o te whiriwhiri

(c) kia kounga, kia whakapūmau, kia raungaiti hoki te āhua o te tāone e hāngai ana ki tōna taiao ake,

(d) kia pai te hononga mā te whiriwhiri momo waka tae atu ki ngā waka tūmatanui, ā,

(e) kia whakahaere i ngā pānga taiao tūkino.

(2) e taea ai e te tangata te noho, ngā pakihi me ngā ratonga hapori te tū ki ngā wāhi o te taiao tāone ki reira:

(a) ka tūtata ki tētahi wāhi pū, tētahi atu wāhi rānei he nui ngā mahi mā te tangata,

(b) ka nui ngā ratonga e taea e te waka tūmatanui o tērā ka maheretia

(c) ka tino nui te tono whare hei noho te whenua hei pakihi rānei e hāngai ana ki ētahi atu wāhia o roto o taua taiao tāone.

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

Planning decisions* regarding urban environments* take into account the Treaty of Waitangi (Te Tiriti o Waitangi)^ principles.

UFD-O4: Te Whakawhanaketanga tāone me Te Tiriti o Waitangi

Ka mahi tahi ngā mahi whakatau māherehere mō ngā taiao tāone me te Te Tiriti o Waitangi principles.

UFD-O5: Urban development and climate change^

Urban environments^{*} are resilient to the *effects*^{*} of *climate change*[^] and support reductions in *greenhouse gas*[^] 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[^] with land[^] use

*Territorial Authorities** must proactively develop and implement appropriate *land*^ use strategies to manage urban growth and they should aligns their



infrastructure^ asset management planning with those strategies, to ensure the efficient and effective provision of associated *infrastructure*^A that:

(1) 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) ensure there is co-ordination between the location, form and timing of urban growth and the 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[^] in accordance with UFD-P1, UFD-P4, and UFD-P5,

(2) local authorities^ being responsive to unanticipated or out of sequence plan changes that would add significantly to development capacity* and contribute to well-functioning urban environments* in accordance with UFD-P6, and

(3) ensuring the urban intensification and expansion necessary to meet the housing bottom lines^{*} specified in Table X^8 is provided for in the Palmerston North District Plan.

Table A Housing L	011011111165	101 1 annerston North, 2021-203	
Housing bottom lines* (number of dwellings)			
Short- to medi	um-term	Long-term	
July 2021 – Jւ	ine 2031	July 2031 – June 2051	
Includes an additi	onal margin	Includes an additional margin	
of 20%	, D	of 15%	
5,045		7,925	

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

Urban growth and rural residential subdivision* on UFD-P3: 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 Class I and II versatile soils for use as production land^A in their assessment of how best to achieve sustainable management.

⁸ UFD-P2(3) inserted xx Month 2022 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.





UFD-P4: Urban intensification and expansion

- (1) Intensification and expansion of *urban environments** is provided for and enabled in *district plans*^ where:
 - (a) it contributes to a *well-functioning urban environment**,

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

(c) higher density development is in close proximity to *centre zones**, *public transport**, *community services**, employment opportunities, and open space,

(d) development is well serviced by existing or planned *development infrastructure*^{*} and *public transport*^{*}, and *additional infrastructure*^{*} required to service the *development capacity*^{*} is likely to be achieved, and

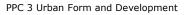
(e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.

- (2) In addition to meeting the criteria in (1) above, the expansion of *urban environments** must only occur where it:
 - (a) is adjacent to existing or planned urban areas,
 - (b) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,
 - (c) is well-connected along transport corridors,
 - (d) manages adverse reverse sensitivity *effects** on land with existing incompatible activities adjacent to the *urban environment** boundary.
- (3) *District plans*^ applying to *urban environments** must enable heights and density of urban form which are equal to the greater of:
 - (a) demonstrated demand for housing and/or business use, or
 - (b) the level of accessibility provided by existing or planned* active transport* or public transport* to areas with community services* and employment opportunities.
- (4) Local authority transport plans and strategies must establish ways to contribute to *well-functioning urban environments** through the provision of *public transport** services and by enabling *active transport**.

UFD-P5: Built forms

The form and design of subdivision, use and development in u*rban environments** is managed so that 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 development across multiple or amalgamated *properties** to achieve all of the above.

UFD-P6: Significant *development capacity** criteria

(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 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 *housing bottom lines**, or specific housing and price needs in the market,

(d) the development will be realised in the *short term*^{*} and before anticipated planned urban development,

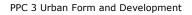
(e) there is adequate existing or upgraded *development infrastructure** to support development of the *land** without adverse *effects** on the provision or capacity of other planned *development infrastructure** including planned *infrastructure** expenditure, and

(f) the development avoids adverse *effects*^{*} on *infrastructure*^ and other physical resources of regional or national importance as far as reasonably practicable.

(2) If the above criteria are met, the Regional Council and *Territorial Authorities** must have particular regard to the contribution the development will have towards achieving UFD-P2.

UFD-P7: Hapū and iwi involvement in urban development

- (1) Ensure planning decisions* involving urban environments* provide for Treaty of Waitangi (Te Tiriti o Waitangi)^ principles by enabling hapū and iwi involvement in urban development planning processes, including in decision making where appropriate, to ensure provision is made for their needs, aspirations, and values, to ensure urban environments* enable Māori to express their cultural traditions and norms.
- (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,

(c) enables early and ongoing engagement with iwi and hapū over urban intensification and expansion,

(c) ensures *urban environments** enable Māori to express their cultural traditions and norms, and

(d) identifies and protects culturally significant areas.

UFD-P8: Urban development and *climate change*^

(1) *Urban environments** are developed in ways that reduce *greenhouse gas*^ emissions and improve resilience to the *effects** of *climate change*^ by:

(a) use of urban design, building form and *infrastructure*^ to minimise the contribution to *climate change*^ of the development and its future use, including (but not limited to) *energy efficiency** (including methods to ensure whole-of-life *energy efficiency**), *water** efficiency, *waste** minimisation, transportation modes (including use of *public transport** and *active transport**) water-sensitive design and nature-based solutions,

(b) urban development being compact, well designed and sustainable, and

(c) requiring best practice resilience to, the impacts of *climate change*^, including *sea level rise** and any increases in the scale and frequency of *natural hazard** events.

(2) *Territorial Authority** decisions and controls:

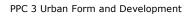
(a) on *subdivision** and *land** use must ensure that sustainable transport options such as *public transport**, walking and cycling can be integrated into *land** use development, and

(b) on *subdivision*^{*} and housing, including the layout of the *site*^{*} and layout of lots in relation to other houses/*subdivisions*^{*}, must encourage energy-efficient house design and access to solar energy.

Methods

Many of the policies in this chapter will be implemented by the Regional Council and *Territorial Authorities** in plan changes, *district plans*^ and in decisions on *resource consents*^ 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.

Method 1	Monitoring and reporting
Description	The aim of this method is to collect information on development and <i>infrastructure</i> ^ 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.





	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 and Palmerston North City Council to jointly prepare and publish <i>Housing and Business Development Capacity Assessments</i> [*] and <i>Future Development Strategies</i> [*] .
Who	Regional Council and Territorial Authorities*
Links to Policy	This method implements UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P7 and UFD-P8.
Target	 Information collected on development and <i>infrastructure</i>^A trends and pressures in the Region. Monitoring and reporting undertaken that meets the requirements of the NPS UD.

Method 2	Strategic planning
Description	The aim of this method is to undertake strategic planning to meet the objectives and policies of this Chapter.
	The Regional Council, together with Palmerston North City Council, will determine housing <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 and Palmerston North City Council will jointly prepare <i>Future Development Strategies*</i> .
	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.
	These strategies will enable decision-making to be based on sufficient information to:
	(a) coordinate the intensification of <i>urban environments</i> * and the development of extensions to <i>urban environments</i> * with <i>infrastructure</i> ^
	 planning, (b) provide the required <i>development infrastructure</i>* in an integrated, timely, efficient and effective way, (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).
	The above may involve the preparation of spatial plans as a method for applying an integrated strategic planning approach.
	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.
	Methods to achieve <i>climate change</i> [^] strategic outcomes will include having regard to targets set in the New Zealand Emissions Reduction Plan in decision-making.
	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.
Who	Regional Council and Territorial Authorities*
Links to Policy	This method implements UFD-P1 to UFD-P8.
Target	Urban development strategic planning documents prepared.Requirements of the NPS UD met.

Method 3	District plans^
Description	The Regional Council will formally seek changes to <i>district plans</i> ^, if necessary, to ensure <i>district plans</i> ^, 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.
	<i>District plans</i> [^] 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 that meet housing demand and mixed-use development (including affordable housing) in <i>urban environments</i> [*] .
	<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> *.
Who	Regional Council and Territorial Authorities*
Links to Policy	This method implements UFD-P1 to UFD-P8.
Target	 District plan[^] changes, if necessary. Regional Council submissions to <i>Territorial Authorities</i>* on proposed district plan[^] changes.

Method 4	Advocacy
Description	 Easily accessible information will be developed and made available to: (a) raise awareness and understanding of natural hazards, greenhouse gas^ reductions, and climate change^, and (b) advocate infill and intensification as a more sustainable urban development option than greenfield development and urban expansion. Work plans to reduce emissions and adapt to climate change^ will be developed and made available, to raise awareness and understanding. Other methods will include: (a) providing guidance on integrating land* use with development infrastructure* and additional infrastructure*, and for delivering high quality urban design, and (b) preparing and disseminating information to raise awareness and understanding of ways to achieve well-functioning urban environments*. Where appropriate, the Regional Council will advocate the objectives and policies in this chapter to external agencies that contribute to shaping urban form and development, such as Kāinga Ora.



Who	Regional Council and Territorial Authorities*	
Links to Policy	This method implements UFD-P4, UFD-P5, UFD-P7 and UFD-P8.	
Target	 Submissions to reforms and strategies from central government agencies, including Kāinga Ora. Ongoing advice and advocacy to interested parties. 	

Principal Reasons

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 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** 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 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

PPC 3 Urban Form and Development



Anticipated Environmental Result	Link to Policy	Indicator	Data Source
UFD-AER1: Urban growth occurs in a strategically planned manner.	UFD-P1	 Urban growth 	 District plan[^] variations and changes
UFD-AER2: Class I and II versatile soils are retained, where appropriate for productive use.	UFD-P3	 Urban growth and rural residential subdivision* 	 District plan[^] variations and changes
UFD-AER3: Urban intensification is achieved.	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	 Urban intensification Housing bottom lines* achieved 	 District plan[^] variations and changes NPS UD monitoring requirements
UFD-AER4: Development infrastructure* is in place in time to facilitate urban intensification or expansion	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	 Urban intensification and growth 	 District plan[^] variations and changes
UFD-AER5: New developments maximise energy and transport efficiency.	UFD-P4, UFD-P8	 Solar energy provisions in district plans^ Increases in active transport* and public transport* 	 District plan[^] variations and changes Regional Land Transport Plan indicator monitoring Census: main means of travel
UFD-AER6: Risks due to the impacts of <i>climate change</i> [^] are minimal to new developments.	UFD-P4, UFD-P8	 Urban intensification and growth 	 District plan[^] variations and changes



Definitions to be added to One Plan

Active transport	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	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.
Additional infrastructure	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	means:
	(a) public open space
	(b) community infrastructure as defined in section 197 of the Local Government Act 2002
	(c) land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities
	(d) social infrastructure, such as schools and healthcare facilities
	(e) a network operated for the purpose of telecommunications (as defined in
	section 5 of the Telecommunications Act 2001) (f) a network operated for the purpose of transmitting or distributing electricity
	or gas
Business Land	has the same meaning as in clause 1.4 of the National Policy Statement on Urban
	Development 2020 (as set out below):
	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:
	(a) any industrial zone
	(b) the commercial zone
	(c) the large format retail zone
	(d) any centre zone, to the extent it allows business uses
	(e) the mixed use zone, to the extent it allows business uses
	(f) any special purpose zone, to the extent it allows business uses.
Centre Zone	has the same meaning as in clause 1.4 of the National Policy Statement on Urban
	Development 2020 (as set out below):
	means any of the following zones:
	(a) city centre zone
	(b) metropolitan centre zone
	(c) town centre zone
	(d) local centre zone (e) neighbourhood centre zone
Community	has the same meaning as in clause 1.4 of the National Policy Statement on Urban
services	Development 2020 (as set out below):
	means the following:
	(a) community facilities
	(b) educational facilities
	(c) those commercial activities that serve the needs of the community.





Development capacity	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	means the capacity of land to be developed for housing or for business use, based on:
	 (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and (b) the provision of adequate development infrastructure to support the development of land for housing or business use.
Development infrastructure	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	means the following, to the extent that they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002):
	 (a) network infrastructure for <i>water</i>* supply, wastewater, or stormwater (b) land transport (as defined in section 5 of the Land Transport Management Act 2003).
Feasible	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	means: (a) for the short term or medium term, commercially viable to a developer based on the current relationship between costs and revenue
	(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.
Future Development	has the same meaning as in the National Policy Statement on Urban Development 2020 (as set out below):
Strategy	means the Future Development Strategy required by subpart 4 of Part 3.
Housing and Business	has the same meaning as in the National Policy Statement on Urban Development 2020 (as set out below):
Development Capacity Assessment	means the Housing and Business Development Capacity Assessment required by subpart 5 of Part 3.
Housing bottom lines	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.
Infrastructure- ready	has the same meaning as in clause 3.4(3) of the National Policy Statement on Urban Development 2020 (as set out below):
	Development capacity is infrastructure-ready if: (a) in relation to the short term, there is adequate existing development infrastructure to support the development of the land, (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, (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).
Long Term	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below): means between 10 and 30 years.
Medium Term	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	means between 3 and 10 years.
Plan-enabled	has the same meaning as in clause 3.4(1) of the National Policy Statement on Urban Development 2020 (as set out below):
	Development capacity is plan-enabled for housing or for business land if: (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 (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 (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.
	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.
Planned	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	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.



Planning decision	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	means a decision on any of the following: (a) a regional policy statement or proposed regional policy statement
	(b) a regional plan or proposed regional plan(c) a district plan or proposed district plan
	(d) a resource consent
	(e) a designation(f) a heritage order
	(g) a water conservation order
Public transport	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	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:
	(a) a vehicle designed or adapted to carry more than 12 persons (including the driver), or
	(b) a rail vehicle, or
	(c) a ferry.
Short term	has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):
	means within the next 3 years.
Sufficient development capacity	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):
	means development capacity that must be the following in order to meet expected demand for housing and business land: (a) plan-enabled; and
	(b) infrastructure-ready; and
	(c) for housing, feasible and reasonably expected to be realised; and(d) for business land, suitable to meet the demands of different business sectors;
	and
	(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.
Urban	has the same meaning as in clause 1.4 of the National Policy Statement on Urban
environment	Development 2020 (as set out below):
	means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:
	(a) is, or is intended to be, predominantly urban in character; and(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.

Well-functioning	has the same meaning as in Policy 1 of the National Policy Statement on Urban
urban	Development 2020 (as set out below):
environments	
	well-functioning urban environments are urban environments that, as a minimum:
	(a) Have or enable a variety of homes that:
	(i) meet the needs, in terms of type, price, and location, of different households; and
	(ii) enable Māori to express their cultural traditions and norms; and
	(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
	(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
	(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
	(e) support reductions in greenhouse gas emissions; and
	(f) are resilient to the likely current and future effects of climate change.



Appendix B - Further detail of the engagement undertaken

Date	Hapū / Iwi / Stakeholder/s	Engagement	
9 October 2020 & 26 February 2021	Palmerston North City Council – staff	Meetings to initiate discussions about the NPS UD and potential approaches for implementation.	
14 July 2021	Territorial Authorities - staff	A brief overview of the upcoming plan change was provided to policy staff from local councils at the Regional Planning Forum. Attendees were invited to provide initial comments (none received).	
13 August 2021	Palmerston North City Council – staff	A face-to-face conversation about the plan change timeframes and opportunities for PNCC to be involved/provide recommendations regarding provisions. There was also discussion around issues that are only applicable to Tier 2 Councils such as the future need to prepare a Future Development Strategy.	
Late August 2021	Ministries, interested parties, Iwi, TAs	Letters were emailed out explaining the NPS UD, our upcoming plan change, and timeframes. Horizons invited questions and input prior to drafting provisions.	
3 September 2021	Spark New Zealand	An officer responded to our letter to request an opportunity to workshop with other network utility providers, to discuss opportunities and challenges.	
		Further correspondence between Horizons' staff and the officer led to agreement that a workshop would be held once a first draft of provisions had been drafted – see below for additional information.	
13 September 2021	A Wellington Regional Growth Framework representative, Greater Wellington Regional Council and Horowhenua District Council - staff	A virtual meeting was held to discuss opportunities for aligned strategic planning in relation to urban development and growth. Greater Wellington Regional Council shared some additional information after the meeting, including the project plan for aligning their RPS Change with the Wellington Regional Growth Framework, and notes about what elements of the Wellington Regional Growth Framework could be incorporated as part of the RPS.	
23 September 2021	Iwi with an identified interest in Tier 2 & 3 urban environments	A follow-up email to the letter Horizons previously sent, reiterating the offer to discuss the project in further detail and inviting input.	
23 September	Rangitāne o Manawatū	Staff received a response: "Thanks for the heads up and happy to have at hui once a draft is developed to hui about."	
2021		Note: staff shared a draft at a later date (see below).	
23 September 2021	Muaūpoko Tribal Authority	Expressed an interest in meeting to discuss in mid – late November. Staff responded that this could be discussed at a face- to-face at the Iwi Regional Hui on 1 December (and to let us know if a different approach is preferred).	

Date	Hapū / Iwi / Stakeholder/s	Engagement	
		Note: The Iwi Regional Hui on 1 December was cancelled due to Covid. Staff offered to set up a separate discussion, but this offer was not accepted.	
23 September 2021	Te Runanga o Tupoho	Te Runanga o Tupoho representatives expressed an interest in meeting to discuss. A hui was arranged for 6 October 2021.	
September 2021	Report to Council	A policy report to Council included an overview of the NPS UD. It noted a workshop to Council would follow to allow discussion.	
6 October 2021	Hui in Whanganui with Te Runanga o Tupoho	 A hui was held in Whanganui. The key items raised were: Stormwater to be considered holistically – consider the use of stormwater management plans. Taiao (environment) is to be at the forefront of thinking – decision making must enhance taiao. Horizons' staff to speak with staff from Whanganui DC about a coordinated approach to further conversations with Runanga o Tupoho. 	
11 October 2021	Whanganui District Council - staff	Staff spoke to a staff member from Whanganui District Council. It was agreed that there would be a joint meeting with Te Runanga o Tupoho in the future.	
		We also spoke about our plan change timeframes and their spatial planning work, and future opportunities for alignment.	
13 October 2021	Council Workshop	An overview of the NPS UD and the requirement to undertake a plan change was provided to Councillors. Councillors were supportive of provisions that align with the objectives and policies of the NPS UD, particularly around issues such as:	
		 Including provisions that will support outcomes associated with the notion of '20 minute communities Enabling intensification Climate adaptation and energy efficiency Strategic planning for infrastructure 	
		Some discussions were also had about the scope of the plan change (e.g., whether it should review highly productive land provisions, natural hazard provisions, etc). These were investigated and are discussed in Appendix D .	
18 October 2021	Waka Kotahi	 Waka Kotahi provided written comments, to be considered when drafting provisions. Waka Kotahi noted they are supportive of introducing the policy outcomes sought by the NPS UD into the RPS, and they would support RPS provisions that include a focus on: well-functioning urban environments accessibility links to housing capacity assessments land-use/transport integration emissions reduction. 	
1 November 2021	Palmerston North City Council – staff	PNCC provided some notes from a meeting they had with the Horizons Transport Team, in regard to intensification and the role of regional council transport services.	





Date	Hapū / Iwi / Stakeholder/s	Engagement	
11 November 2021	Palmerston North City Council – staff	Staff attended a meeting with Palmerston North City Council staff to discuss intensification requirements. Horizons provided an update on the plan change and timeframes, including re-iterating the invitation for PNCC's input.	
25 November 2021	Manawatū DC - staff	 A conversation was held regarding a plan change MDC are preparing in regard to rural-residential zoning, including discussions on flood mapping and the iwi/Māori space. A few items were discussed of relevance to the PPC: Out of sequence urban growth: Horizons need to factor in the affordability of infrastructure to council, including ongoing costs Papakāinga: there is desire for this from whanau in Manawatū District. Consider servicing requirements, flood hazards and allowing for this across multiple land titles. 	
1 December 2021	Horowhenua DC - staff	 A phone conversation about Horizons urban development plan change, and work Horowhenua District Council is undertaking. Including: HDC are starting an intensification plan change in early 2022. The National Policy Statement for Highly Productive Land should be out early next year and may be useful to assist with the NPS UD plan change Horowhenua staff suggested a workshop with TAs when Horizons have drafted provisions (Note: this was actioned – see below). Horowhenua staff noted greenfield development will be needed in addition to intensification, to cater for demand in their district. 	
17 January 2022	Spark New Zealand	Another conversation with staff from Spark. It was noted that Spark will have an interest in the definition of 'infrastructure' and 'regionally significant infrastructure'. It was agreed that Horizons would share draft provisions (once available) and set up a workshop, as earlier discussed.	
8 February 2022	Whanganui District Council - staff	Staff spoke to a staff member at Whanganui District Council to arrange to progress discussions with Te Rūnanga o Tūpoho. A hui was set up for 16 February 2022.	
16 February 2022	Zoom meeting with Whanganui DC staff and Te Runanga o Tupoho representatives	A key focus of the hui was to discuss the NPS UD, the Horizons plan change, the related timeline and some potential provisions Horizons is considering that may be of particular interest to iwi. Staff from Whanganui DC also provided an update on work they are doing on a residential spatial plan.	
		It was agreed (and actioned) that Horizons would share provisions currently being drafted that may be of particular interest to iwi, a project timeline would be shared, and another hui would occur once Te Runanga o Tupoho had time to consider the information.	
8 March 2022	Councillor workshop	Draft provisions were discussed with Councillors, with a focus on the draft objectives. Councillors were supportive and also raised	



Date	Hapū / Iwi / Stakeholder/s	Engagement
		some questions about the scope. These were investigated and are discussed in Appendix D .
14 March 2022	Rangitikei District Council - staff	Staff responded to an email from Rangitikei District Council staff about a spatial planning project they are undertaking, and also provided an update on the progress of our plan change.
19 April 2022	Zoom meeting with Whanganui DC staff and Te Runanga o Tupoho representatives	 Staff provided a working draft of the proposed plan change provisions shortly prior to the meeting. At the meeting staff provided an overview of the NPS UD and the proposed scope of our plan change. Key feedback we received is noted below. Whanganui DC: At a high level it appears to align with what they are trying to achieve They agreed a gap analysis was needed to help explain the scope.
		 Questions about productive land. We explained that this is outside of the scope, and we are awaiting the NPS HPL for further direction.
		 Te Runanga o Tupoho representatives: There was some surprise in regard to how high level the proposed provisions are. They would like to see more detail around issues such as climate change, water and the environment. We explained how some of these are addressed in other chapters and were going to be the subject of a further plan change as part of review of RPS. Horizons also noted the gap analysis it was undertaking. Te Runanga o Tupoho asked to see this when it is complete (this was actioned). The importance of infrastructure was discussed - intensification cannot happen without infrastructure. A discussion occurred regarding how provisions will be implemented. The proposed methods were discussed.
		A learning from this discussion was in regard to the need for the scope to be clearly explained as part of the PPC documentation, along with the roles of regional and district councils.
26 and 27 April 2022	Ministries, interested parties, Iwi, TAs	A letter was sent out that included draft wording for the proposed plan change. Horizons invited input to assist with developing the provisions by 24 May. Horizons invited TAs to attend a zoom workshop to help develop the draft provisions/PPC further.
2 May 2022	Spark New Zealand	Staff made contact to arrange a workshop for 17 May. The Spark representative also provided contact details for other infrastructure providers and Horizons invited them to join.
17 May 2022	Zoom meeting with Infrastructure providers: - Spark - Transpower - Incite (consultancy) - Chorus	Staff provided a PowerPoint of the NPS UD PPC and our progress to date and invited feedback on the draft provisions. Attendees were largely supportive of the PPC. A key issue discussed was how the draft provisions referred to 'associated infrastructure' – questions were raised as to what 'associated' means. A couple of other minor suggestions were put forward,



Date Hapū / Iwi / Engagement Stakeholder/s		Engagement	
	- Kiwirail	which were not in conflict with the proposed provisions. Further detail is provided in Appendix D.	
18 May 2022	Zoom meeting with staff from Manawatū DC, Rangitīkei DC and Horowhenua DC	 Staff offered all TAs in the region an opportunity to discuss the draft jointly. These are the Councils that accepted. Some key points that came out of the discussion are: Some interest in a more regional flavour to the wording of the draft provisions. This could potentially include a session with planners in the region to discuss regional issues - like a spatial planning meeting. Alternatively, if the wording isn't going to have more of a local focus, then consider striping it back and allowing TAs to (for the most part) rely on the NPS UD for direction. There was also interest in adding a new definition (e.g., 'well-functioning communities') that captures all settlements, even smaller ones – and where appropriate apply the provisions to these (so urban areas with less than 10,000 people aren't excluded). The importance of planning for infrastructure was also highlighted. 	
		Some minor amendments were made as a result. In other instances, Horizons identified that the desired outcomes were already being provided for within the proposed provision, or that suggestions were dealing with issues outside of the scope of the PPC (see Appendix D).	
23 May 2022	Palmerston North City Council – staff	A submission was provided from PNCC regarding the draft wording. They requested greater detail be provided in the proposed provisions regarding housing bottom line targets. This request has not been actioned, in line with the NPS UD.	
23 May 2022	Horowhenua DC - staff	Horowhenua DC staff provided written comments regarding dra provisions that elaborated on the items discussed on 18 May.	
		Some minor amendments were made as a result.	
24 May 2022	Rangitikei DC - staff	Rangitikei DC staff provided written comments regarding draft provisions that elaborated on the items discussed on 18 May.	
		Some minor amendments were made as a result.	
25 May 2022	Manawatū DC - staff	Manawatū DC staff provided written comments regarding draft provisions that elaborated on the items discussed on 18 May.	
		Some minor amendments were made as a result.	
26 May 2022	Waka Kotahi	Waka Kotahi provided written comments regarding draft wording. In summary, they noted support for the PPC and alignment of the RPS with the NPS UD. The feedback included suggested changes which could be made to the proposed provisions to strengthen alignment with the NPS UD and broader government transport outcomes.	
		Some minor amendments were made as a result.	
9 June 2022	All iwi contacts	Staff sent a copy of the revised PPC to the Horizons iwi and hapū contact list in accordance with the RMA Schedule 1 Clause 4A requirement. Staff provided six weeks for feedback.	



Date	Hapū / Iwi / Stakeholder/s	Engagement	
17 June 2022	Te Runanga o Tupoho representatives	Staff shared the gap analysis with Te Runanga o Tupoho representatives and offered the opportunity to discuss it further.	
14 July 2022	Te Runanga o Tupoho representatives and Whanganui DC staff	At the request of Te Runanga o Tupoho representatives, staff set up a zoom meeting (that also included a staff member from Whanganui DC) to discuss the gap analysis and talk about the relationship between regional planning and district planning. During this discussion some suggestions were provided regarding the PPC, and some minor amendments were made as a result.	
21 July 2022	Muaūpoko Tribal Authority	Muaūpoko Tribal Authority provided a written response after they received a draft of the PPC (in accordance with the RMA Schedule 1 Clause 4A requirement). Their written response included a table with comments and identifying the relief sought. A summary of feedback is provided in Section 5.2 of the Section	
		32 Report.	
21 July 2022	Te Ao Turoa Environmental Centre	Te Ao Turoa Environmental Centre provided a written response after they received a draft of the PPC (in accordance with the RMA Schedule 1 Clause 4A requirement). Their written response included a table with comments and identifying the relief sought.	
		A summary of feedback is provided in Section 5.2 of the Section 32 Report.	

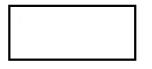


Appendix C – Letters sent to the iwi and hapū contact list

3 September 2021



OMS10 23 RM: LB



tēnā koe I roto i ngā āhuatanga o te wā.

HORIZONS REGIONAL COUNCIL ONE PLAN - PREPARATION OF A PLAN CHANGE

I am writing to let you know that Horizons Regional Council (Horizons) is initiating a change to the Regional Policy Statement in the One Plan to meet the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD). The NPS-UD is intended to improve the responsiveness and competitiveness of land and development markets so that it is easier for people to live in the homes they want, where they want.

The NPS-UD requires Horizons to include provisions in its Regional Policy Statement to support intensification in appropriate urban areas. City and district councils that have urban environments of at least 10,000 people will also need to amend their district plans to meet the requirements of the NPS-UD. Within the Horizons region, this affects Horowhenua District Council (Levin), Manawatū District Council (Feiding), Palmerston North City Council (Palmerston North) and Whanganui District Council (Whanganui). Horizons' One Plan should appropriately support the plans and policies of these Councils.

It is important that Iwi/Māori are engaged in preparing plans and strategies that shape urban environments. The NPS-UD specifically requires planning decisions that have or enable a variety of homes so Māori may express their cultural traditions and norms. For example, supporting kaumātua and papakāinga housing, housing located in relation to the whenua and sites of cultural significance, or housing that enables whānau to undertake cultural practices.

We welcome the opportunity to discuss any questions and feedback that you may have about the NPS-UD, and or, the plan change. We particularly welcome your ideas on how best to enable a variety of homes described above. Please contact Horizons on our Freephone (0508 800 800) to speak with me, or email oneplan@horizons.govt.nz. We intend to start drafting our changes in November 2021, to share a draft with you in March or April 2022, and notify the Plan Change in July or August 2022. We look forward to working with you. Mā iti mā rahi ka rapa te whai.

Hei konā mai i roto i aku mihi

R.B. Dela

Robert Marshall SENIOR POLICY ANALYST

Enclosure NPS-UD information sheet

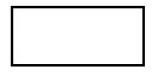
Taumarunui | Whanganui | Marton | Woodville | Palmerston North | Kairanga 24 hour freephone 0508 800 800 | fax 06 952 2929 | email help@horizons.govt.nz Private Bag 11025, Manawatū Mail Centre, Palmerston North 4442 Image: Image:





26 April 2022

OMS10 23 RM: LB



tēnā koe I roto i ngā āhuatanga o te wā.

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

I wrote to you in August last year to inform you that Horizons Regional Council (Horizons) is initiating a change to the Regional Policy Statement in the One Plan and to invite your comments on potential provisions. We have now considered the initial feedback from iwi and stakeholders, and used it to assist us in preparing a first draft of the proposed plan change (enclosed). We invite you to review the draft and to provide feedback to assist us in developing it further.

The plan change is occurring to meet the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD). The NPS-UD is intended to improve the responsiveness and competitiveness of land and development markets so that it is easier for people to live in the homes they want, where they want. The feedback from this current round of iwi and stakeholder engagement will help us develop the draft. Following this we will further engage with iwi, prior to publically notifying the proposed plan change in August this year (as required by the NPS-UD).

It is important that Iwi/Māori are engaged in preparing plans and strategies that shape urban environments. The NPS-UD specifically requires planning decisions that enable a variety of homes so Māori may 'express their cultural traditions and norms'. When reviewing the enclosed draft, you may wish to consider how well we have addressed issues of concern to Iwi/Māori.

Please respond by 24 May 2022 if you have any comments to assist with further development of the plan change. After this date we will make amendments and share a revised draft with you. I am also available to discuss any questions or feedback you have. Please contact Horizons on our Freephone (0508 800 800) to speak with me, or email oneplan@horizons.govt.nz. I look forward to working with you. Mā iti mā rahi ka rapa te whai.

Hei konā mai i roto i aku mihi

R ller

Robert Marshall SENIOR POLICY ANALYST

Enclosure Draft wording for urban development plan change

Taumarunui | Whanganui | Marton | Woodville | Palmerston North | Kairanga 24 hour **freephone 0508 800 800 | fax** 06 952 2929 | **email** help@horizons.govt.nz Private Bag 11025, Manawatū Mail Centre, Palmerston North 4442







9 June 2022

OMS10 23 RM: LB



, tēnā koe I roto i ngā āhuatanga o te wā.

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

I wrote to you in April to share draft wording for a proposed change to the Regional Policy Statement in the One Plan and to invite your feedback. The draft wording I shared was prepared after considering input from iwi and stakeholders since first making contact in September 2021.

After considering the feedback we received on the draft wording we have made some changes. We invite you to review the updated draft (enclosed) and to provide feedback to assist us in further developing it before it is publicly notified. Please note that a legal review prior to public notification may also result in some changes.

The change is occurring to meet the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD). The NPS-UD is intended to improve the responsiveness and competitiveness of land and development markets so that it is easier for people to live in the homes they want, where they want.

It is important that Iwi/Māori are engaged in preparing plans and strategies that shape urban environments. The NPS-UD specifically requires planning decisions that enable a variety of homes so Māori may 'express their cultural traditions and norms'. When reviewing the enclosed draft, you may wish to consider how well we have addressed issues of concern to Iwi/Māori.

Please respond by 21 July 2022 if you have any comments to assist with further development of the plan change. I am also available to discuss any questions or feedback you have. Please contact Horizons on our Freephone (0508 800 800) to speak with me, or email oneplan@horizons.govt.nz. I look forward to working with you. Mā iti mā rahi ka rapa te whai.

Hei konā mai i roto i aku mihi

B ller

Robert Marshall SENIOR POLICY ANALYST

Enclosure Revised draft wording for urban development plan change

Taumarunui | Whanganui | Marton | Woodville | Palmerston North | Kairanga 24 hour **freephone 0508 800 800 | fax** 06 952 2929 | **email** help@horizons.govt.nz Private Bag 11025, Manawatū Mail Centre, Palmerston North 4442





Appendix D – Gap Analysis

The below gap analysis identifies instances where potential provisions have not been included in the PPC because existing provisions already apply. It also considers whether changes to the Regional Policy Statement would create a conflict with existing provisions.

Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
The importance of highly productive land – there can be a conflict between urban growth objectives and the need to protect highly productive land	Councillor workshop, staff	Yes. Objective 3-4: Urban growth and rural residential subdivision on versatile soils To ensure that territorial authorities consider the benefits of retaining Class I and II versatile soils for use as production land^ when providing for urban growth and rural residential subdivision. Policy 3-5: Urban growth and rural residential subdivision on 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 Class I and II versatile soils for use as production	No additional provisions are proposed. We are proposing to retain the existing One Plan provisions. While urban expansion can impact highly productive land, it would go beyond the key focus of the NPS UD to amend existing highly productive land provisions. Further technical assessment is required to support any change in approach. In addition, it would not be a good use of resources at this point in time, when a NPS HPL is expected to be released shortly.	The existing provisions address immediate Councillor and staff concerns. When the NPS HPL is released, this issue can be considered alongside the RPS provisions, and any other national direction. Further work will be required at this point in time.	Investigate further when NPS HPL is released.
Climate adaptation and mitigation provisions are needed within the urban development plan change And Urban development needs to be energy efficient.	Councillor workshop, staff	Yes. However, a greater focus on urban environments is required under the NPS UD. Objectives, policies and methods that directly or indirectly address climate change are in Chapters 3, 4, 5 and 9 of the One Plan, including: Policy 3-6: Renewable energy^ (a) The Regional Council and Territorial Authorities^ must have particular regard to: (i) the benefits of the use and development of renewable energy^ resources including: (A) contributing to reduction in greenhouse gases, (B) reduced dependency on imported energy sources, (C) reduced exposure to fossil fuel price volatility, and (D) security of supply for current and future generations, (ii) the Region's potential for the use and development of renewable energy^ resources, and (iii) the need for renewable energy^ activities to locate where the renewable energy^ resource is located, and	Additional provisions, including the below objective, (relating to both adaptation and mitigation) are proposed to give effect to the NPS UD. <u>The NPS UD includes an objective that:</u> "New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change." <u>Proposed Objective:</u> Urban environments* are resilient to the effects* of climate change^ and support reductions in greenhouse gas^ emissions.	The additional provisions being proposed are not in conflict with existing One Plan provisions, and also give effect to the NPS UD. Note: The Resource Management Amendment Act 2020 is introducing a requirement to have regard to the following (see clause 17) when preparing or changing an <i>RPS:</i> (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and (e) any national adaptation plan made in accordance with	Proceed with additional provisions as part of proposed plan change.

Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
		(iv) the benefits of enabling the increased generation capacity and efficiency of existing renewable electricity generation facilities, and		section 5ZS of the Climate Change Response Act 2002.	
		 (v) the logistical or technical practicalities associated with developing, upgrading, operating or maintaining an established renewable electricity generation activity. 		However , this does not come into force until 30 November	
		(b) The Regional Council and Territorial Authorities [^] must generally not restrict the use of small domestic-scale renewable energy [^] production for individual domestic use.		2022. The following will apply (see Clause 104): <u>26 Transitional effect of climate</u>	
		Policy 3-7: Energy efficiency (a) The Regional Council and Territorial Authorities [^] must have particular regard to the efficient end use of energy in consent decision-making processes for large users of		<i>change amendments</i> (1) This clause applies to a proposed policy statement or plan, change, or variation that,	
		 (b) Territorial Authority^ decisions and controls on subdivision and housing, including layout of the site* and layout of the lots in relation to other houses/subdivisions, must 		<i>immediately before the effective date,—</i> (<i>a</i>) <i>has been publicly notified</i>	
		encourage energy-efficient house design and access to solar energy. (c) Territorial Authority^ decisions and controls on subdivision and land^ use must		under clause 5 or 26(1)(b) of Schedule 1; but (b) has not proceeded to the	
		ensure that sustainable transport options such as public transport, walking and cycling can be integrated into land^ use development.		stage at which no further appeal is possible. (2) This clause also applies to	
		Policy 9-5: Climate change [^] The Regional Council and Territorial Authorities [^] must take a precautionary approach when assessing the effects of climate change and sea level rise [*] on the scale and frequency of natural hazards [^] with regard to decisions on:		applications for resource consents that were lodged with a local authority immediately before the effective date.	
		(a) stormwater discharges[^] and effluent disposal,(b) coastal development and coastal land[^] use,		(3) The proposed policy statement, plan, change, or variation, or resource consent	
		(c) activities adjacent to rivers[^],(d) water[^] allocation and water[^] takes,		must be determined as if the climate change amendments had not been enacted.	
		(e) activities in a Hill Country Erosion Management Area*,(f) flood mitigation activities, and(g) managing storm surge.			
The plan change is an opportunity to include provisions that	Councillor workshop, staff	Partially – in relation to strategically planning for growth. However, a greater focus is required under the NPS UD.	Additional provisions are proposed to give effect to the NPS UD.	Existing provisions in the One Plan do not go far enough to address NPS UD objectives around urban intensification.	Proceed with additional provisions as part of
will support outcomes associated with the notion of '20 minute communities'.		Existing provisions: Objective 3-3: The strategic integration of infrastructure^ with land^ use Urban development occurs in a strategically planned manner which allows for the adequate and timely supply of land^ and associated infrastructure^.	The proposed plan change provisions will support the outcomes associated with the notion of '20 minute communities' (including by enabling compact urban environments). This aligns with NPS UD Objectives (particularly Objective 3).	The additional provisions being proposed are not in conflict with existing One Plan	proposed pla change.



Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
		Policy 3-4: The strategic integration of infrastructure^ with land^ use Territorial Authorities^ must proactively develop and implement appropriate land^ use strategies to manage urban growth, and they should align their infrastructure^ asset management planning with those strategies, to ensure the efficient and effective provision of associated infrastructure^.	We propose to amend Objective 3-3 and Policy 3-4 of the One Plan. Its scope will increase to capture additional objectives in the NPS UD.	provisions, and also give effect to the NPS UD.	
Planning for urban development requires consideration of natural hazard risks. Note: this includes risks from sea level rise.	Councillor workshop, staff	Yes. Chapter 9 of the One Plan addresses Natural Hazards.	 Outside of scope of this plan change - introducing new (or amending existing) natural hazard provisions is not necessary to give effect to the NPS UD as part of this plan change. Further technical evaluation is required as to the effectiveness of the natural hazard provisions against higher order documents, including the NPS UD, and this work will be carried as part of a scheduled RPS review work programme. Further, the Regional Policy Statement must be read as a whole, not each topic in isolation. The draft proposed plan change notes that: "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure^, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values; resource management issues of significance to hapū* and iwi*" 	No action required for urban development plan change. Consider further during S35 evaluation of One Plan Natural Hazards provisions.	Proceed by identifying in the 'scope' section of the plan change that "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance"
Transport planning provisions are needed within the urban development plan change / Regional Council must play a role in enabling urban development through its approach to public transport provision.	PNCC	Yes. However, a greater focus on urban environments is required under the NPS UD. Objective 3-2: Energy An improvement in the efficiency of the end use of energy and an increase in the use of renewable energy^ resources within the Region. Objective 3-3: The strategic integration of infrastructure^ with land^ use Urban development occurs in a strategically planned manner which allows for the adequate and timely supply of land^ and associated infrastructure^. Policy 3-1: Benefits of infrastructure^ and other physical resources of regional or national importance (a) The Regional Council and Territorial Authorities^ must recognise the following infrastructure^ as being physical resources of regional or national importance:	Additional provisions are proposed to give effect to the NPS UD.	The existing One Plan provisions address some urban development transport planning issues. However, they do not go far enough to address NPS UD objectives around the role of public transport in urban environments. The additional provisions being proposed are not in conflict with existing One Plan provisions, and also give effect to the NPS UD.	Proceed with additional provisions as part of proposed plan change.



Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
Greenfield development will be needed in addition to intensification, to achieve growth	PNCC, Horowhenua DC	(iv) the road^ and rail networks as mapped in the Regional Land Transport Strategy Policy 3-2: Adverse effects^ of other activities on infrastructure^ and other physical resources of regional or national importance The Regional Council and Territorial Authorities^ must ensure that adverse effects^ on infrastructure^ and other physical resources of regional or national importance from other activities are avoided as far as reasonably practicable, including by using the following mechanisms: (h) ensuring effective integration of transport and land^ use planning and protecting the function of the strategic road^ and rail network as mapped in the Regional Land Transport Strategy. Policy 3-7: Energy efficiency* (c) Territorial Authority^ decisions and controls on subdivision and land^ use must ensure that sustainable transport options such as public transport, walking and cycling can be integrated into land^ use development. Partially - greenfield development needs to have regard to various existing One Plan provisions (e.g., protecting highly productive land and indigenous biodiversity). The Regional Policy Statement must be read as a whole, not each topic in isolation. Existing One Plan provisions will be applicable.	The proposed plan change includes provisions that enable greenfield development in certain circumstances, but existing One Plan provisions also apply. Integrated planning between land use and infrastructure is also required. Further, the Regional Policy Statement must be read	Existing provisions in the One Plan do not go far enough to address NPS UD objectives around urban development (which includes greenfield development).	Proceed with additional provisions as part of proposed plan change.
requirements			as a whole, not each topic in isolation. The PPC notes that: "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure^, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values; resource management issues of significance to hapū* and iwi*"	The additional provisions being proposed are not in conflict with existing One Plan provisions, and also give effect to the NPS UD.	
Water quality in urban environments needs to be a priority.	Councillor workshop, staff, iwi engagement	Chapter 5 of the One Plan addresses water, including water quality.	The proposed plan change includes a provision that promotes water-sensitive design and nature-based solutions in urban environments.	The proposed plan change provision is not in conflict with existing RPS provisions.	Investigate further through NPS FM plan change so this issue can be



Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
				Further provisions will need to be investigated through the NPS FM plan change.	considered holistically.
					And proceed with additional provision.
The ongoing need to protect indigenous biodiversity	Councillor workshop, staff	Chapter 6 of the One Plan addresses indigenous biodiversity.	Outside of scope of this plan change - introducing new (or amending existing) indigenous biodiversity provisions is not necessary to give effect to the NPS UD as part of this plan change. Further technical evaluation is required as to the effectiveness of the indigenous biodiversity provisions against higher order documents, including the NPS UD, and this work will be carried as part of a scheduled RPS review work programme. The Regional Policy Statement must be read as a whole, not each topic in isolation. The draft proposed plan change notes that: "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure^, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values; resource management issues of significance to hapū* and iwi*"	No action required for urban development plan change. Consider further during S35 evaluation of One Plan Indigenous Biodiversity provisions. In addition, a NPS IB is expected to be released shortly that will provide further direction.	Proceed by identifying in the 'scope' section of the plan change that "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance" And investigate further when NPS IB is released.
Infrastructure is vital for intensification and expansion	Staff, stakeholders, iwi engagement	Policy 3-2: Adverse effects^ of other activities on infrastructure^ and other physical resources of regional or national importance The Regional Council and Territorial Authorities^ must ensure that adverse effects^ on infrastructure^ and other physical resources of regional or national importance from other activities are avoided as far as reasonably practicable, including by using the following mechanisms: (a) ensuring that current infrastructure^, infrastructure^ corridors and other physical resources of regional or national importance, are identified and had regard to in all resource management decision-making, and any development that would adversely affect the operation*, maintenance* or upgrading* of those activities that would adversely affect the operation*, maintenance* or upgrading* of infrastructure^ and other physical	The proposed plan change addresses this issue further in numerous provisions. The proposed provisions are worded to avoid a conflict with existed Policy 3-2.	The proposed provisions are not in conflict with Policy 3-2 of the One Plan.	Proceed with additional provisions as part of proposed plan change.



Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	1
		resources of regional or national importance are not located near existing		
		such resources or such resources allowed by unimplemented resource		
		<i>consents</i> [^] or other RMA authorisations,		
		(c) ensuring that there is no change to existing activities that increases their		
		incompatibility with existing infrastructure^ and other physical resources of		
		regional or national importance, or such resources allowed by		
		unimplemented resource consents^ or other RMA authorisations,		
		(d) notifying the owners or managers of <i>infrastructure</i> ^ and other physical		
		resources of regional or national importance of consent applications that		
		may adversely affect the resources that they own or manage,		
		(e) ensuring safe separation distances are maintained when establishing		
		rules^ and considering applications for buildings, structures^ and other		
		activities near overhead electric lines and conductors e.g., giving effect to		
		the New Zealand Code of Practice for Electrical Safe Distances (NZECP		
		34:2001), prepared under the Electricity Act 1992, and the Electricity		
		(Hazards from Trees) Regulations 2003 prepared under the Electricity Act		
		1992,		
		(f) ensuring safe separation distances are maintained when establishing		
		rules^ and considering applications for buildings, structures^ and other		
		activities near transmission gas pipelines e.g., giving effect to the		
		Operating Code Standard for Pipelines - Gas and Liquid Petroleum		
		(NZS/AS 2885) and the Gas Distribution Networks (NZS 5258:2003), the		
		latter promulgated under the Gas Act 1992,		
		(g) ensuring that any planting does not interfere with existing <i>infrastructure</i> ^,		
		e.g., giving effect to the Electricity (Hazards from Trees) Regulations 2003		
		promulgated under the Electricity Act 1992 and Section 6.4.4 External		
		Interference Prevention of the Operating Code Standard for Pipelines -		
		Gas and Liquid Petroleum (NZS/AS 2885), and		
		(h) ensuring effective integration of transport and <i>land</i> ^ use planning and		
		protecting the function of the strategic <i>road</i> ^ and rail network as mapped		
		in the Regional Land Transport Strategy.		
Consider any urban development implications on	Staff	The One Plan addresses historic heritage and cultural values in numerous locations.	The NPS UD does discuss 'cultural significance' when requiring local authorities to take account of the principles of the Treaty of Waitangi. Provisions are being proposed in the plan change to give effect to	



	Assessment	Actions to complete
ı	Additional provisions being proposed in relation to the role of the Treaty of Waitangi for urban development. These are	Proceed with additional provisions as part of

Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
historic and cultural values			this requirement in the NPS UD. Further review of the One Plan with regard to these matters can occur as part of the scheduled RPS review work programme. Further, the Regional Policy Statement must be read as a whole, not each topic in isolation. The draft proposed plan change notes that: "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure^, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values; resource management issues of significance to hapū* and iwi*"	not in conflict with existing One Plan provisions, and also give effect to the NPS UD. Plus consider further during applicable S35 evaluations.	proposed plan change. And also, by identifying in the 'scope' section of the plan change that "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance"
Urban development and the Treaty of Waitangi (Te Tiriti o Waitangi) (including protection for sites of significance such as wāhi tapu)	Staff	 Partially – not specifically in relation to urban development. In particular, chapter 2 of the One Plan takes into account the principles of the Treaty of Waitangi. "The special position of hapū* and iwi* as a Treaty partner is reflected in the specific provisions for Māori under the RMA. The RMA requires the Regional Council to take into account the principles of the Treaty of Waitangi in exercising its functions and powers. The Council does this in a number of ways in the objectives and policies that follow in this chapter, and throughout the rest of the Plan." Policy 2-1: Hapū* and iwi* involvement in resource management Kaupapa 2-1: Te whakauru mai o ngā hapū me ngā iwi ki roto i te whakahaere rauemi The Regional Council must enable and foster kaitiakitanga^ and the relationship between hapū* and iwi* and their ancestral lands^, water^, sites*, wāhi tapu* and other taonga* (including wāhi tūpuna*) through increased involvement of hapū* or iwi* which set clear relationship and communication parameters to address resource management objectives, 	Additional provisions are proposed to give effect to the NPS UD.	Additional provisions being proposed in relation to the role of the Treaty of Waitangi for urban development. These are not in conflict with existing One Plan provisions, and also give effect to the NPS UD.	Proceed with additional provisions as part of proposed plan change. And also by identifying in the 'scope' section of the plan change that "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance"



Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?
		(b) recognition of existing arrangements and agreements between resource users, local authorities and hapū* or iwi*,	
		(c) development of catchment-based forums, involving the Regional Council, hapū*, iwi*, and other interested groups including resource users, for information sharing, planning and research,	
		(d) development, where appropriate, of hap \bar{u}^* and iwi* cultural indicator monitoring programmes by the Regional Council,	
		(e) assistance from the Regional Council to hap \bar{u}^* or iwi* to facilitate research, projects, seminars and training,	
		(f) development of joint management agreements $^{\rm A}$ between the Regional Council and hap $\bar{\rm u}^*$ or iwi* where appropriate,	
		(g) the Regional Council having regard to iwi management plans* lodged with Council,,	
		(h) involvement of hapū* or iwi* in resource consent^ decision-making and planning processes in the ways agreed in the memoranda of partnership and joint management agreements^ developed under (a) and (f) above, and	
		(i) the Regional Council advising and encouraging resource consent^ applicants to consult directly with hap \bar{u}^* or iwi* where it is necessary to identify:	
		(i) the relationship of Māori and their culture and traditions with their ancestral lands^, water^, sites*, wāhi tapu* and other taonga* (including wāhi tūpuna*), and	
		(ii) the actual and potential adverse effects^ of proposed activities on those relationships.	
Stormwater management – the importance of	Iwi engagement	The effect of discharges on water quality and flooding are. One Plan Chapter 14 Discharges to Land and Water permitted activity Rule 14-18 allows discharges of stormwater to surface water provided conditions and standards are met, including that discharges of stormwater	Stormwater is captured in the NPS UD 'Development Infrastructure' definition.
existing or planned development infrastructure		to land cannot result in overland flows discharging to natural surface water bodies other than in rain events that are at least the 10% annual exceedance probability design storm. Nor can any discharge cause or exacerbate flooding on any other property.	Draft provisions in the proposed plan change address the need for existing or planned 'development infrastructure' to enable urban development.
		Other than the effect of discharges on water quality and flooding, this is outside of the scope of the One Plan. The One Plan notes that "the effects of stormwater are managed by Territorial Authorities under different criteria including engineering, subdivision and design standards/manuals".	Outside of scope of this plan change - introducing new (or amending existing) regarding the effect of discharges on water quality and flooding is not necessary to give effect to the NPS UD as part of this plan change. Further technical evaluation is required as to the effectiveness of these One Plan provisions against higher order documents, including the NPS UD, and this work will be carried as part of a scheduled RPS review work programme.



ban r	Assessment	Actions to complete
nent dress	Provisions are being proposed in the urban development plan change to address this issue.	Proceed with provisions as part of proposed plan change.
ng of f this uired ons PS		

Urban Form & Development Issue	How was this issue raised	Is this already addressed in the One Plan? If so, to what extent?	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
Taiao (environment) is to be at the forefront of thinking	Iwi engagement	Yes. These themes are integrated in to the existing One Plan, particularly Ch 2.	 Outside of scope of this plan change - introducing new (or amending existing) regarding Taiao provisions is not necessary to give effect to the NPS UD as part of this plan change. Further technical evaluation is required as to the effectiveness of these One Plan provisions against higher order documents, including the NPS UD, and this work will be carried as part of a scheduled RPS review work programme. Further, the Regional Policy Statement must be read as a whole, not each topic in isolation. The draft proposed plan change notes that: <i>"Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance on achieving a built form that relates well to its surrounding environment, on matters including, but not limited to, energy, infrastructure^, transport; hazards and risks; ecosystems and indigenous biodiversity; historic and cultural values; resource management issues of significance to hapū* and iwi*"," The existing One Plan provisions address this issue.</i> The NPS UD is focussed on urban environments. However, the draft plan change provisions also seek to enable urban development in a manner that takes into account the principles of te Tiriti o Waitangi, supports climate change initiatives, & prevents development from adversely impacting the natural environment. 	No action required for urban development plan change. Consider further during S35 evaluations.	Proceed by identifying in the 'scope' section of the plan change that "Objectives, policies and methods set out in other chapters of this Regional Policy Statement also provide guidance"
Urban development in townships with less than 10,000 people	Council workshop	Partially – in relation to strategically planning for growth. Objective 3-3: The strategic integration of infrastructure^ with land^ use Urban development occurs in a strategically planned manner which allows for the adequate and timely supply of land^ and associated infrastructure^. Policy 3-4: The strategic integration of infrastructure^ with land^ use Territorial Authorities^ must proactively develop and implement appropriate land^ use strategies to manage urban growth, and they should align their infrastructure^ asset management planning with those strategies, to ensure the efficient and effective provision of associated infrastructure^.	The PPC is directed towards the NPS UD's focus on 'urban environments' (and the definition includes " <i>is,</i> <i>or is intended to be, part of a housing and labour</i> <i>market of at least 10,000 people</i> "). However, some objectives apply more broadly to urban development generally, including with regard to strategic planning and integration of infrastructure – UFD-O1, and UFD- P1, for example.	No action required for urban development plan change.	No action required.
It is important that measures are in place to	Councillor workshop	No. This is outside of the scope of the One Plan and Horizons' role in preparing an urban development plan change.	Outside of scope - not a regional council function.	No action required.	No action required.



Urban Form & Development Issue	How was this issue raised	If it's not adequately addressed in the One Plan, are we proposing provisions in the urban development plan change? If so, what's our justification?	Assessment	Actions to complete
ensure building standards will be achieved.				





Appendix E - Scale and Significance Evaluation⁹

In order to ensure that the evaluation is undertaken to an appropriate level of detail, the matrix below has been used as a tool to assess the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

Lower significance				Higher significance	Comment
	Low	Medium	High		
Does not affect a matter of national importance (s6)		\checkmark		Affects a matter of national importance	There are s6 matters affected.
Does not affect an 'other matter' (s7)		\checkmark		Affects an 'other matter'	Five s7 matters are affected.
Does not affect any Treaty of Waitangi principles ¹⁰		~		Affects one or more Treaty of Waitangi principles	The NPS UD emphasises the existing requirements in the Resource Management Act 1991 to take into account the principles of the Treaty of Waitangi in urban development and ensure iwi/Māori are engaged in processes to prepare plans and strategies that shape urban environments (see NPS UD Policy 9).
Is not the subject of a NPS			\checkmark	Gives effect to an NPS	Gives effect to the NPS UD.
Is consistent with national ¹¹ or regional direction ¹² through standards, plans, other	~			There is no national or regional direction	Is consistent with and gives effect to the NPS UD. The NPS UD is the driver for the PPC.

⁹ Based on Nelson City Council's s32 evaluation template additional guidance document.

¹⁰ https://www.tpk.govt.nz/documents/download/documents-

<u>179/He%20Tirohanga%20%20Kawa%20k%C4%93%20te%20Tiriti%20%20Waitangi.pdf.</u> ¹¹ This evaluation must be considered in light of King Salmon. Where a higher order planning document

 ¹¹ This evaluation must be considered in light of King Salmon. Where a higher order planning document provides a clear directive to 'give effect', these directives will be deemed to be in accordance with Part 2.
 ¹² E.g., Regional Land Transport Plan; Regional Climate Action Strategy; Regional Pest Management Plan; Civil Defence and Emergency Management Group Plan.

Lower significance				Higher significance	Comment
	Low	Medium	High		
strategies or guidance					
Is a minor change to the operative One Plan		~		Involves a major change to the operative One Plan	The PPC includes three new objectives, six new policies, four new methods and 22 new defined terms – all applicable to the Urban Form and Development chapter.
Does not affect iwi and hapū		~		Affects iwi and hapū	The NPS UD specifically requires planning decisions that have or enable a variety of homes so Māori may express their cultural traditions and norms. It also requires the principles of the te Tiriti o Waitangi to be accounted for in urban planning decisions.
Is consistent with iwi strategies and planning documents	\checkmark			There are no iwi strategies or planning documents	See Section 3.2.1 of Section 32 Report – the proposal is not in conflict with iwi planning documents.
Does not affect groups with specific interests (e.g., TAs; commercial vegetable growers; landowners)		~		Affects groups with specific interests	Pre-notification engagement has not generated high levels of interest. The RPS changes will impact property developers and landowners, however, the NPS UD would have already been relevant as part of any plan change or consenting process at a TA level. The changes seek to provide greater clarity/certainty as to



Lower significance				Higher significance	Comment
	Low	Medium	High		
					the implementation of the NPS UD at a regional level.
Does not affect many people		~		Many people will be affected	Provides Regional Policy Statement direction to enable better outcomes for urban environments.
Is consistent with current best practice through New Zealand		~		Is not consistent with current best practice through New Zealand / no established best practice / highly variable practice through the country	The approach reflects the intent of other plan changes implementing the NPS UD.
Unlikely to significantly reduce opportunities or restrict options for land or natural resource use	~			Could significantly reduce opportunities or restrict options for land or natural resource use	Seeks to enable urban development in appropriate locations, including through intensification. It also is specifically directed towards implementing national planning direction.
Unlikely to be controversial, high degree of agreement within the community, low interest in issue	√			Likely to be controversial, high degree of disagreement within the community, high level of interest in issue	Pre-notification engagement has not generated a high level of interest or controversy.
Unlikely to have a major financial impact on individuals / communities / businesses [due to compliance and or	\checkmark			Likely to have a major financial impact on landowners / developers / businesses [due to compliance	The proposal is not anticipated to impose any unreasonable costs on the community. Components of the proposal seek to



Lower significance				Higher significance	Comment
	Low	Medium	High		
administrative costs]				and or administrative costs]	improve housing affordability.
Low consequences in terms of environmental, social or economic effects if proposal is ineffective	~			High consequences in terms of environmental, social or economic effects if proposal is ineffective	No high consequences identified. The provisions align with the NPS UD.







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