

**BEFORE A HEARINGS PANEL
FOR THE MANAWATŪ-WHANGANUI REGIONAL COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of proposed Plan Change 3 (**PC3**) to the Consolidated Regional Policy Statement, Regional Plan and Regional Coastal Plan for the Manawatū-Whanganui Region (**One Plan**)

**STATEMENT OF REPLY EVIDENCE OF LEANA SHIRLEY
ON BEHALF OF MANAWATŪ-WHANGANUI REGIONAL COUNCIL**

**PLANNING
24 JANUARY 2024**

TABLE OF CONTENTS

A. INTRODUCTION.....	3
B. RESPONSE TO EMMA HILDERINK-JOHNSON ON BEHALF OF FONTERRA LIMITED... Urban Development and Climate Change	3
Reverse Sensitivity	4
C. RESPONSE TO SUZANNE O’ROURKE ON BEHALF OF FONTERRA LIMITED	5
Reverse Sensitivity	5
D. RESPONSE TO PAM BUTLER ON BEHALF OF KIWIRAIL HOLDINGS LIMITED	6
Reverse Sensitivity	6
E. RESPONSE TO PAULINE WHITNEY ON BEHALF OF TRANSPower NEW ZEALAND LIMITED	9
Objective UFD-O3.....	9
F. RESPONSE TO LAUREN BADDOCK AND LISA POYNTON ON BEHALF OF HOROWHENUA DISTRICT COUNCIL	10
Keystone Environmental Issues and Scope.....	10
Consenting of development infrastructure	11
National Policy Statement for Highly Productive Land 2022	13
Intensification vs Greenfield Development	14
UFD - Policies.....	16
UFD - Methods	18
G. RESPONSE TO KATRINA GRAY AND TIFFANY GOWER ON BEHALF OF RANGITIKEI DISTRICT COUNCIL	20
Development of Smaller Settlements.....	20
Providing for Papakāinga Housing	21
National Policy Statement for Highly Productive Land 2022	22
H. RESPONSE TO MATTHEW MACKAY ON BEHALF OF MANAWATŪ DISTRICT COUNCIL	23

A. INTRODUCTION

1. My full name is Leana Mary Shirley.
2. I prepared a section 42A report dated 1 December 2023 on Planning (**s 42A Report**) on behalf of Manawatū-Whanganui Regional Council (**Council or Horizons**) for Proposed Plan Change 3 (Urban Development) (**PC3**) to the Regional Policy Statement (**RPS**) part of the Council's One Plan.
3. My experience and qualifications are set out in my s 42A Report.
4. I repeat the confirmation given in my s 42A Report that I have read and will comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.
5. This evidence addresses issues raised in evidence filed by submitters on PC3. Any recommended changes in response to matters raised through submitter evidence is contained in 'Appendix 1, Redrafted provisions based on submitter expert evidence' attached.

B. RESPONSE TO EMMA HILDERINK-JOHNSON ON BEHALF OF FONTERRA LIMITED

Urban Development and Climate Change

6. Paragraphs 2.6-2.9 of Ms Hilderink-Johnson's evidence for Fonterra raise concerns about the use of the term "minimise" in UFD-P8(1)(a), without the qualifier of "as far as reasonably practicable" which was sought through Fonterra's primary submission. Ms Hilderink-Johnson considers that the qualifying words are appropriate, and necessary to recognise other design drivers, including potential future changes in the legal understanding of the term minimise.
7. In my opinion, relying on the term 'minimise' without the qualifier 'as far as reasonably practicable' is sufficient to communicate the intent of UFD-P8(1)(a). That is, I consider it should be a clear, unwavering policy to ensure urban environments are developed in a way that minimises contributions to climate change through urban design, form, and infrastructure. Should the legal understanding of the term minimise change in the future, then it is my view it is appropriate for UFD-P8(1)(a) be applied under that

modern legal understanding for any development of urban environments in the context of its contribution to climate change at that time.

8. Further, in the context of UFD-P8, I consider that the term ‘minimise’ already implies a commitment to doing so within the reasonable and/or practical limits for the development project in question. While I recognise that some developers may consider this restrictive in their developments, it remains my opinion that such limits should be left implicit, as the words ‘as far as reasonably practicable’ would introduce a potentially subjective loophole and dilute the clarity of the policy.
9. In my view the word “minimise” given its natural meaning ‘to reduce to the lowest level possible’ is appropriate in the context of UFD-P8(1)(a) without further qualification.

Reverse Sensitivity

10. Paragraphs 2.18 – 2.27 of Ms Hilderink-Johnson’s evidence for Fonterra addresses a concern about reverse sensitivity effects on Fonterra plants, specifically the Longburn processing site. Ms Hilderink-Johnson’s evidence highlights that Fonterra is not captured by the NPS-UD definition of nationally significant infrastructure and I also note that it is not captured by existing Policy 3-1 of the One Plan as regionally or nationally important.
11. In respect of UFD-P4(2)(d), which would apply to Fonterra’s milk processing plants, Ms Hilderink-Johnson considers that the term “managing” does not provide sufficient policy guidance in comparison to a stronger direction of ‘avoiding’ and is concerned that it may result in unreasonable restrictions or impacts on existing incompatible activities.
12. While I acknowledge Fonterra’s concerns in regards to the Longburn processing site and potential future plan changes to enable urban expansion of the west of Palmerston North (referred to by Palmerston North City Council as Kākātangiata), I do not support Fonterra’s proposed solution of imposing a new definition of “regionally significant industry” nor its proposed inclusion by reference in UFD-I3, UFD-O3 and UFD-P4. In my view this definition adds unnecessary complexity to PC3 and may have unintended consequences. For example, the threshold for whether an economic activity is regionally or nationally beneficial would be uncertain, and it is not clear what industries apart from Fonterra would be caught in this new classification. I am apprehensive about

how other industries could interpret this proposed definition in the context of PC3, and I do not consider it appropriate to generate such uncertainty with a new classifying definition at this stage.

13. While I acknowledge and accept that the term “manages” does not direct how potentially adverse reverse sensitivity effects should be addressed in all circumstances, in my opinion, it provides guidance to decision makers that adverse sensitivity effects on incompatible activities require consideration and control in relation to new urban development. In my view, it is appropriate for territorial authorities to consider what such ‘management’ requires in relation to urban expansion, with focussed consideration of the issue for incompatible activities. In relation to existing industry such as Fonterra’s milk processing plant, ‘management’ may require a greater level of control over adverse reverse sensitivity effects associated with urban development and I consider that UFD-P4(2)(d) provides for that.
14. Accordingly, I recommend that the wording of UFD-P4(2)(d) be retained as per my s 42A report.

C. RESPONSE TO SUZANNE O’ROURKE ON BEHALF OF FONTERRA LIMITED

Reverse Sensitivity

15. I have read and understood Ms O’Rourke’s evidence, including as it relates to reverse sensitivity and Fonterra’s approach to managing the effects of that on their sites. I note the type of issues that Fonterra seeks to avoid and their request that incompatibility or reverse sensitivity be minimised at a district level through tools such as objectives, policies, and zone controls.
16. I agree that such matters should be addressed at a district level, but I remain comfortable that an RPS direction for focussed consideration on ‘managing’ such effects is appropriate, without the need to specify in PC3 that the management response must be to ‘minimise’ or ‘avoid’ such issues of incompatibility in all cases.

D. RESPONSE TO PAM BUTLER ON BEHALF OF KIWIRAIL HOLDINGS LIMITED

Reverse Sensitivity

17. Paragraphs 5.5 and 5.6 of Ms Butler’s evidence for KiwiRail Holdings Limited identify inconsistencies in the term used for referring to nationally significant infrastructure between UFD-I3, UFD-O3(1)(f) and UFD-P4(1)(f). Ms Butler seeks that PC3 be amended to consistently use the term ‘nationally significant infrastructure’ as defined in the NPS-UD.
18. I agree with Ms Butler and recommend the wording in UFD-I3 be amended to refer to ‘nationally significant infrastructure’ with an asterisk and italicised to identify it as a defined term under the format of the One Plan. I also recommend references to nationally significant infrastructure in UFD-O3 and UFD-P4(2)(e) be amended to include the asterisk and italics for the same reason.
19. Recommended changes in response to Ms Butler’s evidence are shown in black ~~striketrough~~ (deletions) and black underline (additions):

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

A growing population increases demand for housing, *business land**, *infrastructure^* and *community services**. Growth in urban environments*¹ needs to be provided for in a way that contributes to *well-functioning urban environments**, is integrated with *infrastructure^* planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance—nationally significant infrastructure*², does not worsen³ effects* on the urban and natural environment (including freshwater)⁴, and improves resilience to the *effects** of *climate change^*.

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,

¹ Submission point 12.5

² Submission point 4.2, FS1.6, FS2.2, FS3.4

³ Submission point 5.1

⁴ Submission point 5.1

- (b) increase the capacity and choice available within housing and business land⁵
~~capacity and housing choice,~~
- (c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment~~⁶,
- (d) are, or planned to be,⁷ well connected by a choice of transport modes including *public transport**, ~~and~~
- (e) manage adverse environmental *effects** ~~and~~
- (f) manage reverse sensitivity effects) on the operation, maintenance and upgrade of nationally significant infrastructure*, including infrastructure of regional or national importance⁸.

UFD-P4: Urban intensification and expansion

- (1) Intensification and expansion of *urban environments** is provided for and enabled in *district plans*[^] where:
 - (a) it contributes to a *well-functioning urban environment**,
 - (b) it provides for a range of residential and business⁹ areas that enable different housing and business types, *site** size and densities ~~that relate well to the surrounding environment~~¹⁰,
 - (c) higher density development is in close proximity to *centre zones**, *public transport**, *community services**, employment opportunities, and open space,
 - (d) development is well serviced by existing or planned *development infrastructure** and enables provision of¹¹ *public transport**, and *additional infrastructure** required to service the *development capacity** is likely to be achieved, ~~and~~
 - (e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character-, and
 - (f) the operation, maintenance and upgrade of nationally significant infrastructure* is not compromised¹².
- (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 by a variety of transport modes and¹³ transport corridors,

⁵ Submission point 14.1

⁶ Submission point 11.1 and 7.4

⁷ Submission point 7.5

⁸ Submission point 1.1, FS1.1

⁹ Submission point 14.2

¹⁰ Submission point 11.5 and 7.4

¹¹ Submission points 7.5, 10.6, 12.9

¹² Submission point 1.2

¹³ Submission point 2.9

(d) manages adverse reverse sensitivity *effects** on land with existing incompatible activities, including¹⁴ adjacent to the *urban environment** boundary, and

(e) does not compromise the operation, maintenance and upgrade of *nationally significant infrastructure**¹⁵.

20. Paragraph 5.7 of Ms Butler’s evidence highlights inconsistency in the use of the term ‘avoid’, with UFD-I3 outlining the need for urban development to ‘avoid’ the creation of reverse sensitivity effects, while UFD-O3 and UFD-P4 do not require avoidance and instead seek to ‘manage’ reverse sensitivity effects so that the maintenance, operation, and upgrade of nationally significant infrastructure is not compromised. Ms Butler seeks that the term ‘avoid’ be applied to UFD-O3 and UFD-P4.
21. I do not support applying the term ‘avoid’ to UFD-O3 and UFD-P4 for the same reasons as I have given above in response to Ms Hilderink-Johnson’s evidence. Avoidance of reverse sensitivity effects places the strongest restriction possible. Therefore, while I understand and appreciate the reasons for seeking this level of protection, I do not consider it aligns with the intention or direction of PC3. As addressed above, in some scenarios, potentially adverse reverse sensitivity effects may be appropriately mitigated or minimised in the opinion of a territorial authority and/or the existing incompatible activity (e.g. Fonterra) or provider of nationally significant infrastructure. I consider it is appropriate for the policy to direct attention on these considerations as part of urban development and expansion, and in my view, the use of the term ‘manage’ provides sufficient strength to ensure reverse sensitivity effects on nationally significant infrastructure are addressed through those processes to a level where the infrastructure is not compromised.
22. I also note the requested relief of Ms Whitney for Transpower, which seeks the inclusion of wording in UFD-O3 to ensure the infrastructure is not compromised (see paragraphs 24-26 of this evidence below). I support the inclusion of this wording, which may assist with some of the concerns raised by Ms Butler.
23. I do not recommend any further changes to UFD-I3, UFD-O3 and UFD-P4.

¹⁴ Submission point 4.9

¹⁵ Submission point 1.3, FS1.2

E. RESPONSE TO PAULINE WHITNEY ON BEHALF OF TRANSPOWER NEW ZEALAND LIMITED

Objective UFD-O3

24. Ms Whitney expresses the view that the amendments to UFD-O3 do not go far enough to protect nationally significant infrastructure from the effects of urban development and expansion. Ms Whitney's view is that UFD-O3(1)(f) should apply to all effects, not just reverse sensitivity effects and that Transpower's proposed changes will better give effect to the NPS-ET.
25. I am comfortable with Ms Whitney's rationale in paragraphs 7.4-7.10 of her evidence and am of the view that these changes are within the scope of PC3.
26. I therefore recommend UFD-O3(1)(f) be amended as requested by Ms Whitney in her evidence (changes shown in black underline):

UFD-O3: Urban form and function

The intensification and expansion of *urban environments**:

- (1) contributes to *well-functioning urban environments** that
- (a) enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future,
 - (b) increase the capacity and choice available within housing and business land¹⁶ ~~capacity and housing choice~~,
 - (c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment~~¹⁷,
 - (d) are or planned to be,¹⁸ well connected by a choice of transport modes including *public transport**, ~~and~~
 - (e) manage adverse environmental *effects** ~~and~~
 - (f) manage effects (including reverse sensitivity effects) on the operation, maintenance and upgrade of nationally significant infrastructure, including infrastructure of regional or national importance¹⁹, to ensure the infrastructure is not compromised.

¹⁶ Submission point 14.1

¹⁷ Submission point 11.1 and 7.4

¹⁸ Submission point 7.5

¹⁹ Submission point 1.1, FS1.1

F. RESPONSE TO LAUREN BADDOCK AND LISA POYNTON ON BEHALF OF HOROWHENUA DISTRICT COUNCIL

Keystone Environmental Issues and Scope

27. Paragraphs 19-27 of Ms Baddock and Ms Poynton’s evidence provides additional context and reasoning for including sustainable growth and urban development as a keystone issue in Chapter 1 of the One Plan RPS. Paragraph 28 outlines their recommended amendments to clause 1.3 of Chapter 1 of the One Plan.
28. I appreciate Ms Baddock and Ms Poynton’s reasoning, however, the Council may not consider this to be a keystone issue of same importance as the other four issues. This level of consideration around issue prioritisation has not been undertaken at Council and did not occur as part of the development and notification of PC3. I do not consider it would be appropriate to determine the issue to be of such prominence in the limited context of this plan change. Such elevation of this particular issue also raises questions about other issues that are similarly important but do not have the same identification as a ‘keystone’ regional issue, such as air quality.
29. For these reasons, I consider the issue of sustainable growth and urban development would be better dealt with through a separate plan change process to ensure it can be considered more wholly with any amendments to Chapter 1 made in a considered and integrated manner.
30. I also note that Horizons does not currently have any Tier 1 urban environments and only one Tier 2. While the region is experiencing growth, whether that is at a level that warrants it being included as a ‘keystone’ issue for the region requires further analysis by the Council. In my view it was not the intention of PC3 to amend other chapters of the One Plan and consideration of the level of importance for this issue was not undertaken as part of drafting PC3. PC3 remains focussed on giving effect to Council’s obligations under the NPS-UD.
31. Therefore, my recommendations in paragraph 115 (page 49) and Table 6 (page 58) of my s 42A report still stand.

Consenting of development infrastructure

32. Paragraphs 29-42 of Ms Baddock and Ms Poynton’s evidence state concerns that UFD-P1 does not adequately address Regional Council’s role in enabling territorial authorities to provide development infrastructure and the impact this can have on urban development and expansion. Ms Baddock and Ms Poynton accept that amending UFD-P1 to address this matter would complicate the policy. Therefore, they have recommended a new policy be included to address the issue as follows:

“UFD-PX

Development infrastructure and other infrastructure needed to support Territorial Authorities ability to the requirements of UFD-P1 will be provided for so long as this will not cause inappropriate environmental effects.”

33. While I acknowledge Ms Baddock and Ms Poynton’s views on regional council’s role in enabling development infrastructure to be delivered, through resource consenting, or plan change processes, I do not consider there is sufficient justification for their proposed policy.
34. The policy direction in the NPS-UD and through PC3 draw attention to the importance of integration of urban environments with development infrastructure, however I do not consider there to be justification for singling out development infrastructure for specific ‘enabling’ or elevated recognition within the RPS. The intention of Ms Baddock and Ms Poynton’s proposed policy appears to be to provide a policy ‘boost’ to the consenting of development infrastructure where that is required under other chapters of the One Plan, for example where stormwater infrastructure requires resource consent.
35. In my view, singling out development infrastructure for enablement through the proposed RPS policy is unnecessary. Development infrastructure resource consents should be considered by a regional council on its environmental merits rather than solely due to its association with an urban growth proposal.
36. Given how this proposed policy is intended to be applied, thorough consideration of its potential interactions with other provisions in the One Plan should be given, including scenarios where development infrastructure might face potential decline, such as when

there might be effects associated with flooding. The inclusion of Ms Baddock and Ms Poynton’s proposed policy would result in consequential questions as to whether the provisions of the regional plan appropriately give effect to this proposed policy.

37. In considering what could be an alternative approach to address Ms Baddock and Ms Poynton’s concern, I considered possible amendments to Method 2, to acknowledge the role of regional council as a consent authority for development infrastructure. However, I felt that even that approach could potentially lead to uncertainty as the reader contemplates what ‘acknowledging’ the regional council role in development infrastructure might mean. Overall, I did not consider such amendments to Method 2 to be necessary or helpful, as they may lead to uncertainty about how to balance acknowledging development infrastructure at the consenting stage.
38. Accordingly, the recommendations from my s 42A report stand.
39. Paragraphs 39-40 outline Horowhenua District Council’s similar concern that the recommended changes in my s 42A report potentially frustrate the ability of territorial authorities to give effect to PC3 and the NPS-UD. Specifically, Ms Baddock and Ms Poynton raised concerns about the addition of the words “does not worsen” to UFD-I3 in relation to effects. To that end, their evidence (in paragraph 41) recommends changes, shown in black underline to UFD-I3 as follows:

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

A growing population increases demand for housing, *business land**, *infrastructure^* and *community services**. Growth in urban environments*²⁰ needs to be provided for in a way that contributes to *well-functioning urban environments**, is integrated with *infrastructure^* planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance²¹, ~~does not worsen²²~~ manages manages effects* on the urban and natural environment (including freshwater²³), and improves resilience to the *effects** of *climate change^*.

40. I note that Ms Baddock and Ms Poynton seek to retain the word ‘manage’ from the notified version of PC3. I support the reasoning outlined in paragraphs 39-41 of their

²⁰ Submission point 12.5

²¹ Submission point 4.2, FS1.6, FS2.2, FS3.4

²² Submission point 5.1

²³ Submission point 5.1

evidence and it was not my intention to make this issue more restrictive. I accept their recommended changes to UFD-I3 outlined above.

National Policy Statement for Highly Productive Land 2022

41. Paragraphs 43-49 of Ms Baddock and Ms Poynton’s evidence outlines their revised view regarding the inclusion of the term ‘highly productive land’ and the associated definition from the NPS-HPL into PC3. Paragraph 50 of their evidence requests that the reference to highly productive land be removed and the notified (original) wording, ‘versatile soils’, be reinstated.
42. Horowhenua District Council’s concerns revolve around the potential for the amendments to unintentionally make the RPS more permissive than the NPS-HPL and possibly give a reader of the One Plan a false impression that the RPS has been amended to give effect to the NPS-HPL completely.
43. As outlined in my primary s 42A report²⁴ the amendments intend to minimise conflict with the NPS-HPL, specifically its definition of ‘highly productive land’. The amendments are not intended to fully give effect to the NPS-HPL which I recognise requires a separate process. My response to the concerns raised by Ms Baddock and Ms Poynton is outlined as follows:
 - (a) The existing One Plan provisions are already more permissive than the NPS-HPL, in that they apply to Class 1 and 2 soils only. In my view the amendments are not creating a new problem in the One Plan or worsening the existing one. The changes mean that the One Plan will be more aligned with the NPS-HPL, because Class 3 land will be included as a required consideration.
 - (b) The recommended amendments are not designed to give effect to the NPS-HPL. The RPS will still need to go through a Schedule 1 Plan Change to give effect to the NPS-HPL within the timeframe specified. The Council has committed to undertaking this process separately to PC3.
 - (c) The Council has been undertaking a Plan Amendment (Plan Amendment 3) to give effect to the National Planning Standards. Plan Amendment 3 (PA3) is

²⁴ Paragraphs 142-155

nearing completion. PA3 is due to be taken to the Council for adoption in early 2024. PA3 includes a new mandatory table which makes it clear that the One Plan has not been reviewed to give effect to the NPS-HPL. It should be apparent from this that the Council does not regard PC3 as giving effect to the NPS-HPL. A copy of the draft table is provided below to show how this will be presented in PA3.

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

44. For the reasons given above, my recommendations outlined in paragraphs 153-155 and Table 7 (pages 73-82) of the s 42A report still stand.

Intensification vs Greenfield Development

45. Ms Baddock and Ms Poynton raise concerns in paragraphs 52-57 of their evidence regarding the perceived imperative that UFD-O3 requires urban expansion to achieve compact urban form, which is not always possible in the submitters' view. Paragraph 58 of their evidence suggests amendments to UFD-O-3(1)(c) to address this issue – shown in black underline:

UFD-O3: Urban form and function

The intensification and expansion of *urban environments**:

(1) contributes to *well-functioning urban environments** that

(a) enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future,

(b) increase the capacity and choice available within housing and business land¹⁵ ~~capacity and housing choice,~~

(c) achieve a quality, sustainable, and compact urban form (to the extent that can reasonably be achieved for urban expansion) ~~that relates well to its surrounding environment¹⁶,~~

(d) are, or planned to be,¹⁷ well connected by a choice of transport modes including *public transport**, and

(e) manage adverse environmental *effects** and

(f) manage reverse sensitivity effects on the operation, maintenance and upgrade of nationally significant infrastructure, including infrastructure of regional or national importance¹⁸.

46. Compact urban form is an important part of reducing greenhouse gas emissions. I accept that urban expansion may not always achieve compact urban form and on first glance could appear to be internally inconsistent. However, the apparent inconsistency arises in the processing of urban expansions that are not well-planned or managed which lead to situations such as urban sprawl, inefficient land use, and community fragmentation. Urban growth that focuses on compact urban form should be kept as an objective as a fundamental part of the planning process to create well-functioning environments and support reductions in greenhouse gas emissions, as required by the NPS-UD.
47. UFD-P4 implements UFD-O3 by outlining how compact urban form will be achieved. Within UFD-P4, provision of different housing and business types, sites, sizes, and densities, and higher density development in close proximity to centre zones is part of the criteria for urban development and expansion. I am of the view that it is possible to have an urban expansion plan change or proposal that can, and should, achieve the 'compact urban form' objective.
48. Accordingly, I do not support the proposed additional wording to UFD-O3. I consider it weakens the intent of the Objective to a degree I am not comfortable with.
49. I therefore recommend UFD-O3(1)(c) be retained as per my s 42A report.

50. To address the concerns raised in paragraphs 52-57 of their evidence, Ms Baddock and Ms Poynton also recommend a minor amendment to UFD-P4(1)(b) as follows (shown in black underline):

UFD-P4: Urban intensification and expansion

(1) Intensification and expansion of *urban environments** is provided for and enabled in *district plans*[^] where:

- (a) it contributes to a *well-functioning urban environment**
- (b) it provides for a range of residential and/or business³³ areas that enable different housing and business types, *site** size and densities ~~that relate well to the surrounding environment~~³⁴,
- (c) higher density development is in close proximity to *centre zones**, *public transport**, *community services**, employment opportunities, and open space,
- (d) development is well serviced by existing or planned *development infrastructure** and enables provision of³⁵ *public transport**, and *additional infrastructure** required to service the *development capacity** is likely to be achieved, and

51. I am comfortable with this change and recommend UFD-P4(1)(b) be amended as requested by Ms Baddock and Ms Poynton.

UFD - Policies

UFD-P2 - Housing bottom lines

52. Paragraphs 62-72 of Ms Baddock and Ms Poynton's evidence responds to paragraph 119 of my s42A report. I support the rationale provided by Horowhenua District Council for not including housing bottom lines for Levin in UFD-P2. My recommendation in paragraph 119 of the s 42A report therefore stands.

UFD-P4

53. Paragraphs 73-75 of Ms Baddock and Ms Poynton's evidence suggests amendments to UFD-P4(2)(c) to align with other amendments to enable development to be approved subject to transport infrastructure being able to be provided. I support their recommendations, and the amendments proposed under paragraph 74, however I recommend a minor editorial change to simplify the wording.
54. Ms Baddock and Ms Poynton sought the wording of UFD-P4(2)(c) be reworded as follows (shown in black underline):

In addition to meeting the criteria in (1) above, the expansion of *urban environments** must only occur where it:

- (c) is adjacent to existing or planned urban areas,
- (d) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,
- (c) is, or is able to be, well-connected ~~along by a variety of transport modes and~~²⁵ transport corridors,

55. The editorial change I suggest is to use the words “or can be”. I therefore recommend UFD-P4(2)(c) be amended as follows (shown in black underline):

UFD-P4(2)(c)

(2) In addition to meeting the criteria in (1) above, the expansion of *urban environments** must only occur where it:

- (e) is adjacent to existing or planned urban areas,
- (f) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,
- (c) is, or can be, well-connected ~~along by a variety of transport modes and~~²⁶ transport corridors,
- (d) manages adverse reverse sensitivity *effects** on land with existing incompatible activities, including²⁷ adjacent to the *urban environment** boundary, and
(e) does not compromise the operation, maintenance, and upgrade of nationally significant infrastructure²⁸.

UFD-P7(1)

56. Paragraphs 78-79 of Ms Baddock and Ms Poynton’s evidence outline concerns that UFD-P7(1) does not accurately reflect the nuanced role of iwi and hapū involvement in plan preparation and decision making. Their evidence recommends amendments to better articulate the role iwi and hapū play in the plan development phase and to better align with the terminology used in Policy 9 of the NPS-UD. The requested amendments are shown in black underline and purple ~~strikethrough~~:

Local authorities, in taking account of the principles of Te Tiriti o Waitangi (Treaty of Waitangi) in relation to urban environments, must ~~Ensure planning decisions* involving urban environments* provide for Treaty of Waitangi (Te Tiriti o Waitangi) principles by~~

²⁵ Submission point 2.9

²⁶ Submission point 2.9

²⁷ Submission point 4.9

²⁸ Submission point 1.3, FS1.2

enableing 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.

57. I agree with the rationale provided in Ms Baddock and Ms Poynton’s evidence on UFD-P7 and accept the changes requested.
58. In reviewing the request of Ms Baddock and Ms Poynton, I also found a minor editorial error in the wording of UFD-P7. In my view, the word “and” has been overlooked in the second to last line which affects the flow of the wording in this Policy.
59. I therefore recommend UFD-P7(1) be amended as follows (additions shown in black underline and deletions shown in black ~~striketrough~~):

UFD-P7: Hapū and iwi involvement in urban development

Local authorities, in taking account of the principles of Te Tiriti o Waitangi (Treaty of Waitangi) in relation to urban environments, must ~~Ensure *planning decisions** involving *urban environments** provide for Treaty of Waitangi (Te Tiriti o Waitangi)~~ principles by enableing 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, and to ensure *urban environments** enable Māori to express their cultural traditions and norms.

60. I note the above recommended changes have not been discussed with iwi and hapū, due to timing. However, in my view, the changes proposed do not change the intent or requirement to engage with iwi and hapū under Policy UFD-P7 and further engagement on its impacts is likely not necessary.

UFD - Methods

61. Horowhenua District Council proposes changes to Methods 1 and 2 to reflect the non-statutory nature of the relationship between the Wellington Regional Leadership Committee and Horowhenua District Council. This is outlined in paragraphs 80-82 of

Ms Baddock and Ms Poynton’s evidence, with paragraph 82 providing amended wording.

62. I agree with the reasoning and changes to Methods 1 and 2 as suggested by Horowhenua District Council.
63. Therefore, I recommend the following changes (shown in black underline) as outlined in paragraph 82 of Horowhenua District Council’s evidence:

Method 1 Monitoring and Reporting

The aim of this method is to collect information on development and *infrastructure*[^] 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 *Territorial Authorities**, must meet the evidence-based decision-making requirements of Subpart 3 of the NPS UD, in relation to *urban environments**. This includes a requirement for the Regional Council, ~~and~~ Palmerston North City Council and Horowhenua District Council (with the Wellington Regional Leadership Committee while Horowhenua District Council are part of the Wellington Regional Leadership Committee)²⁹ to jointly prepare and publish *Housing and Business Development Capacity Assessments** and *Future Development Strategies**.

Method 2 Monitoring and Reporting

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 and Horowhenua District Council (through the Wellington Regional Leadership Committee while Horowhenua District Council are part of the Wellington Regional Leadership Committee)³⁰, will determine housing *development capacity** that is *feasible** and likely to be taken up in *short term**, *medium term**, and *long term** through *Housing and Business Development Capacity Assessments**. In addition, the Regional Council, ~~and~~ Palmerston North City Council and Horowhenua District Council (through the Wellington Regional Leadership Committee while Horowhenua District Council are part of the Wellington Regional Leadership Committee)³¹ will jointly prepare *Future Development Strategies**.

²⁹ Submission point 17.7

³⁰ Submission point 17.8

³¹ Submission point 17.8

G. RESPONSE TO KATRINA GRAY AND TIFFANY GOWER ON BEHALF OF RANGITIKEI DISTRICT COUNCIL

Development of Smaller Settlements

64. Paragraphs 12-17 of Ms Gray and Ms Gower’s evidence for Rangitikei District Council seeks amendments to UFD-I3 to recognise smaller towns and communities, not just urban environments. The amendments sought are outlined in paragraph 17 (shown as black ~~strike through~~ and underline) as follows:

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

A growing population increases demand for housing, *business land**, *infrastructure*[^] and *community services**. Growth ~~in urban environments~~^{*22} needs to be provided for in a way that contributes to *well-functioning communities*~~urban environments~~^{*}, is integrated with *infrastructure*[^] planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance³³, does not worsen³⁴ *effects** on the urban and natural environment (including freshwater)³⁵, and improves resilience to the *effects** of *climate change*[^].

65. I acknowledge the intention, however, I do not support the requested deletion of ‘urban environments’ in UFD-I3. The primary purpose of PC3 is to give effect to the NPS-UD and provide the required guidance for development and expansion of urban environments. I consider it important that UFD-I3 retain its reference to urban environments in its defined sense when discussing the issues around growth and meeting demand for housing, business land, infrastructure, and community services. Further, UFD-I3 creates the policy flow into the Objectives and Policies (UFD-O1, UFD-O3, UFD-O5, UFD-P2, UFD-P4, UFD-P5, UFD-P6 and UFD-P8) and from there to the methods.

66. That said, I accept that ‘communities’ which might fall outside of the definition of ‘urban environments’ should also be subject to the same considerations for infrastructure planning and funding and reverse sensitivity. At least, I see no reason why population

³² Submission point 12.5

³³ Submission point 4.2, FS1.6, FS2.2, FS3.4

³⁴ Submission point 5.1

³⁵ Submission point 5.1

growth in these communities should be excluded from any mention in the RPS. Therefore, I recommend that UFD-I3 be amended to include additional wording relating to smaller towns and communities as follows:

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

A growing population increases demand for housing, *business land**, *infrastructure*[^] and *community services**. Growth in urban environments^{*36} needs to be provided for in a way that contributes to *well-functioning urban environments**, is integrated with *infrastructure*[^] planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance³⁷, does not worsen³⁸ *effects** on the urban and natural environment (including freshwater)³⁹, and improves resilience to the *effects** of *climate change*[^]. Growth in smaller towns and communities that are not *urban environments** should also be provided in a manner which contributes to well-functioning communities that achieve the principles of *well-functioning urban environments**.

67. In my opinion, the above wording addresses the relief sought in Ms Gray and Ms Gower’s evidence, while retaining the required link to the NPS-UD direction and policy flow. Should my recommended amendments not be accepted by Rangitīkei District Council, then I recommend the wording from my s 42A report be retained.

Providing for Papakāinga Housing

68. In paragraphs 22 and 24, Ms Gray and Ms Gower outline their view that UFD-P7 (hapū and iwi involvement in urban development) should not be restricted to urban environments and have supplied amended wording that replaces ‘urban environments’ with ‘towns and communities’ in UFD-P7(1) and (2).
69. In my opinion, Ms Gray and Ms Gower’s request goes beyond the direction of the NPS-UD and the initial scope of PC3 as notified. To align with the NPS-UD (specifically Objective 5 and Policy 9), I believe UFD-P7 must continue to refer to ‘urban environments’. In my view, it would create inconsistencies with the NPS-UD and the remainder of PC3 if it was not expressed in this way. Therefore, I do not support the

³⁶ Submission point 12.5

³⁷ Submission point 4.2, FS1.6, FS2.2, FS3.4

³⁸ Submission point 5.1

³⁹ Submission point 5.1

deletion of 'urban environments' in UFD-P7(1) and (2)(c) as sought by Rangitīkei District Council.

70. In terms of including the term 'towns and settlements' in UFD-P7, in principle, I accept and understand the desire for UFD-P7 to apply to all urban planning, regardless of the size of the community. However, given that this goes beyond the scope of the NPS-UD and, thus, the notified direction of PC3, I consider UFD-P7 should not be expanded to apply to towns and settlements. If it were, UFD-O5 would require an amendment to include towns and settlements as well. Lastly, I consider this change would need to be explored with iwi and hapū to seek their feedback on whether this policy should be expanded to smaller communities, beyond the scope of the NPS-UD. Due to timing this engagement has not occurred.
71. Finally, even without this change I would note that territorial authorities such as the Rangitīkei District would be able to voluntarily ensure that their respective district plans or other policy documents are prepared or changed in order to provide for these matters if they do not already.
72. For the reasons above, my recommendations from my s 42A report stand.

National Policy Statement for Highly Productive Land 2022

73. Paragraphs 28-30 of Ms Gray and Ms Gower's evidence highlight their support of the amendments to PC3 to replace references to 'versatile soils' with 'highly productive land'. However, they note in paragraph 30 that they are not opposed to further consideration being given to the appropriateness of the proposed replacement of 'versatile soils' with 'highly productive land'. This aligns with the points raised in Horowhenua District Council's evidence, questioning whether the inclusion of the term 'highly productive land' makes the One Plan more permissive than the NPS-HPL, and therefore in contradiction with the Council's requirements under the RMA.
74. Rather than repeating my views, I refer to paragraph 43 of this evidence in response to Horowhenua District Council's evidence on the same matter.

H. RESPONSE TO MATTHEW MACKAY ON BEHALF OF MANAWATŪ DISTRICT COUNCIL

75. The evidence of Mr Mackay largely accepts the recommendations from my primary section 42A report. However, Mr Mackay raises concerns about the lack of recognition in PC3 around the significant role infrastructure funding plays as a non-regulatory method for delivering urban environments. Mr Mackay is of the view that Method 2 requires additional wording to make this more explicit. This is outlined in paragraphs 6.2-6.8 of Mr Mackay's evidence, with recommended amendments to Method 2 provided in paragraph 6.9 as follows (Mr Mackay's recommended amendments are shown in black underline):

Method 2 Strategic Planning

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 and Horowhenua District Council (through the Wellington Regional Leadership Committee)⁴⁰, will determine housing *development capacity** that is *feasible** and likely to be taken up in *short term**, *medium term**, and *long term** through *Housing and Business Development Capacity Assessments**. In addition, the Regional Council, ~~and~~ Palmerston North City Council and Horowhenua District Council (through the Wellington Regional Leadership Committee)⁴¹ will jointly prepare *Future Development Strategies**.

Other *Territorial Authorities**, 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 *urban environments** and the development of extensions to *urban environments** with regional council and territorial authority⁴² infrastructure^ planning,
- (b) provide the required *development infrastructure** 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.

⁴⁰ Submission point 17.8

⁴¹ Submission point 17.8

⁴² Submission point 11.3

Council's plan and fund for future urban development through the Infrastructure Strategy & Long-term Plans (LTPs). Facilitating urban development is best done by planning and funding lead infrastructure through the LTP processes. If Councils do not plan for residential growth through the LTP this can result in unplanned (developer-led) development (potentially at larger lot sizes that is desirable) or a lack of infrastructure can constrain residential growth.

Methods to achieve *active transport** and *public transport** strategic outcomes will include providing *public transport** services, increasing accessibility via *active transport** and micro-mobility devices such as e-bikes and e-scooters, and by implementing the Regional Public Transport Plan.

Methods to achieve *active transport** and *public transport** strategic outcomes will include providing *public transport** services, increasing accessibility via *active transport** and micro-mobility devices such as e-bikes and e-scooters, and by implementing the Regional Public Transport Plan.

Methods to achieve *climate change*[^] strategic outcomes will include having regard to targets set in the New Zealand Emissions Reduction Plan in decision-making.

The Regional Council and *Territorial Authorities** will engage with hapū and iwi when undertaking strategic planning to meet the objectives and policies of this Chapter, including to ensure *urban environments** enable Māori to express their cultural traditions and norms.

76. In principle I accept the argument and reasoning provided by Mr Mackay in paragraphs 6.2-6.8 of his evidence. I am generally comfortable with the additional wording in Method 2 to recognise the role long term planning plays in infrastructure funding and urban development. However, I do consider there is a risk in referring solely to infrastructure plans and long-term plans as funding mechanisms. I am conscious that in some cases councils may seek funding sources outside the long-term plan in order to supplement infrastructure development and maintenance including through Infrastructure Funding and Finance strategies (IFF) and/or other mechanisms. I consider any paragraph added to Method 2, needs to be more open to other ways in which development may be funded by the territorial authority responsible.
77. Therefore, I recommend amendments to refine and clarify the intent of Mr Mackay's recommended wording as well as to provide for other funding mechanisms. My recommended edits are shown in ~~blue strikethrough~~ and underline:

Council's will generally plan and fund for future urban development through their Infrastructure Strategies & Long-term Plans (LTPs). In most cases, facilitating urban development is best done by planning and funding lead infrastructure through the LTP processes, however where necessary or appropriate Councils may seek alternative funding sources outside the LTP. Ultimately, if Councils do not plan for residential growth through the LTP this can result in unplanned ~~(developer-led) development (potentially at larger lot sizes that is desirable) or a lack of infrastructure can or constrained~~ residential growth.

78. In the event that Mr Mackay or the Panel does not accept my recommended changes, I recommend the wording of Method 2 be retained as per my original s 42A report.

Leana Shirley

24 January 2024



Urban Development Plan Change

S42A Redrafted provisions based on submitter expert evidence

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

Key

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

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**.

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

Urban growth and rural residential *subdivision** on highly productive land* versatile soils²

Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto highly productive land*~~the more versatile soils~~ almost always may result in a reduction of reduces³ options for their future productive use.

¹ Submission points 7.1, 10.11, 12.2, 12.5, FS3.15, FS3.17

² Submission points 7.7, 10.2, 12.1, 12.6

³ Submission point 13.1

Key

One Plan wording to be retained	Black
Notified One Plan wording to be removed	Black with strikethrough
Notified changes	Purple
S42A recommended changes – new text	Blue text underlined
S42A text to be removed	Blue with strikethrough
S42A rebuttal evidence – new text	Black text underlined

Such reduction in options ~~This may~~ adversely affects the ability of future generations to meet their reasonably foreseeable needs.

Issues

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

Urban growth that is not strategically ~~poorly~~ planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, *development infrastructure** and ~~associated~~ *additional infrastructure**. It can also have the potential to create reverse sensitivity effects⁴. This does not contribute to a *well-functioning urban environment**, can create adverse environmental *effects** and will make it more difficult for urban development to meet the needs of current and future communities.

UFD-I2: **Adverse effects* from urban growth and rural residential subdivision* on versatile soils-highly productive land*⁵**

Urban growth and rural residential *subdivision** (“lifestyle blocks”), on highly productive land* versatile soils may almost always results in a reduction of the productive capacity of that land⁶ these soils no longer being available for use as production land. These development pressures often occur on the fringes of some of the Region's urban areas, ~~most notably Palmerston North~~.

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

A growing population increases demand for housing, *business land**, *infrastructure^* and *community services**. Growth in urban environments*⁷ needs to be provided for in a way that contributes to *well-functioning urban environments**, is integrated with *infrastructure^* planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance-nationally significant infrastructure*⁸, does not worsen⁹ manages effects* on the urban and natural environment (including freshwater)¹⁰, and improves resilience to the *effects** of *climate change^*. Growth in smaller towns and communities that are not urban environments* should also be provided in a manner which contributes to well-functioning communities that achieve the principles of well-functioning urban environments*.

⁴ Submission point 4.1, FS1.5, FS2.1, FS3.3

⁵ Submission points 7.7, 10.2, 12.4, 12.6

⁶ Submission point 13.2

⁷ Submission point 12.5

⁸ Submission point 4.2, FS1.6, FS2.2, FS3.4

⁹ Submission point 5.1

¹⁰ Submission point 5.1

Key

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

Objectives

UFD-O1: ~~The strategic integration of infrastructure[^] with land[^] use~~ **Strategic planning and urban development**

Strategic planning for urban development ensures that ~~occurs in a strategically planned manner which allows for the adequate and timely supply of land[^] 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-tāone¹¹**

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 highly productive land^{*12}**

To ensure that *Territorial Authorities** consider the benefits of retaining highly productive land* Class I and II¹³ versatile soils¹⁴ for use as *production land** when providing for urban growth and rural residential *subdivision**.

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

¹² Submission points 7.7, 10.2, 14.4, 19.1

¹³ As identified in the Land Use Capability Classification system.

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

Key

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

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 the capacity and choice available within housing and business land¹⁵ capacity and housing choice,
 - (c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment¹⁶~~,
 - (d) are, or planned to be,¹⁷ well connected by a choice of transport modes including *public transport**, ~~and~~
 - (e) manage adverse environmental *effects** ~~and~~
 - (f) manage effects (including reverse sensitivity effects) on the operation, maintenance and upgrade of *nationally significant infrastructure**, including infrastructure of regional or national importance¹⁸, to ensure the infrastructure is not compromised.
- (2) enable more people to live in, and more businesses and *community services** to be located in, areas of an *urban environment** where:
 - (a) it is in or near a *centre zone** or other area with many employment opportunities, ~~or¹⁹~~
 - (b) it is able to be, or is,²⁰ well-served by existing or planned *public transport** and active transport²¹, ~~or~~
 - (c) there is a high demand for housing or *business land**, relative to other areas within that *urban environment**.

¹⁵ Submission point 14.1

¹⁶ Submission point 11.1 and 7.4

¹⁷ Submission point 7.5

¹⁸ Submission point 1.1, FS1.1

¹⁹ Submission points 7.12, 10.1, 12.7

²⁰ Submission point 7.5

²¹ Submission point 19.2

Key

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

UFD-O3: Te āhua me te heinga o te tāone²²

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

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

(a) e whai wāhi ana ngā tāngata katoa, hapori mai, whakatipuranga mai kia pai tō rātou orange ā-ōhanga, ā-ahurea, tō rātou hauora me te haumarū i āiane, 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 tūkinō.

(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 relating to²³ urban environments* take into account the principles of the²⁴ Treaty of Waitangi (Te Tiriti o Waitangi)[^] principles.*

UFD-O4: Te Whakawhanaketanga tāone me Te Tiriti o Waitangi²⁵

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.*

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

²³ Submission points 7.12, 10.1, 12.7

²⁴ Submission points 7.12, 10.1, 12.7

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

Key

One Plan wording to be retained	Black
Notified One Plan wording to be removed	Black with strikethrough
Notified changes	Purple
S42A recommended changes – new text	Blue text underlined
S42A text to be removed	Blue with strikethrough
S42A rebuttal evidence – new text	Black text underlined

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*[^] that:~~

- (1) for urban environments^{*26}, demonstrate how *sufficient development capacity*^{*} for housing and *business land*^{*} will be provided in the *short term*^{*}, *medium term*^{*} and *long term*^{*} in a well-planned and integrated manner, and
- (2) for all settlements^{,27} ensure there is co-ordination between the location, form and timing of urban growth development²⁸ and the planning²⁹, 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

²⁶ Submission point 7.12, 10.1, 12.7

²⁷ Submission point 7.12, 10.1. 12.7

²⁸ Submission point 10.3

²⁹ Submission point 11.3

Key

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

(3) ensuring the urban intensification and expansion necessary to meet the *housing bottom lines** specified in Table X³⁰ is provided for in the Palmerston North District Plan.

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

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

UFD-P3: Urban growth and rural residential *subdivision on highly productive land³² ~~versatile soils~~**

In providing for urban growth (~~including implementing Policy 3-4~~), and controlling rural residential *subdivision** (“lifestyle blocks”), *Territorial Authorities** must pay particular attention to the benefits of the retention of highly productive land* ~~Class I and II versatile soils~~ for use as *production land*[^] in their assessment of how best to achieve sustainable management.

UFD-P4: Urban intensification and expansion

- (1) Intensification and expansion of *urban environments** is provided for and enabled in *district plans*[^] where:
- (a) it contributes to a *well-functioning urban environment**
 - (b) it provides for a range of residential and business³³ areas that enable different housing and/or business types, *site** size and densities ~~that relate well to the surrounding environment~~³⁴,
 - (c) higher density development is in close proximity to *centre zones**, *public transport**, *community services**, employment opportunities, and open space,
 - (d) development is well serviced by existing or planned *development infrastructure** and enables provision of³⁵ *public transport**, and *additional infrastructure** required to service the *development capacity** is likely to be achieved, ~~and~~
 - (e) it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character^{-,}, and

³⁰ 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.

³¹ Submission point 11.4

³² Submission point 19.4, 14.5, 13.5, 12.6, 10.2, 7.7

³³ Submission point 14.2

³⁴ Submission point 11.5 and 7.4

³⁵ Submission points 7.5, 10.6, 12.9

Key

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

(f) the operation, maintenance and upgrade of nationally significant infrastructure* is not compromised³⁶.

- (2) In addition to meeting the criteria in (1) above, the expansion of *urban environments** must only occur where it:
- (a) is adjacent to existing or planned urban areas,
 - (b) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,
 - (c) is, ~~or can be,~~ well-connected along by a variety of transport modes and³⁷ transport corridors,
 - (d) manages adverse reverse sensitivity *effects** on land with existing incompatible activities, including³⁸ adjacent to the *urban environment** boundary, and
 - (e) does not compromise the operation, maintenance and upgrade of nationally significant infrastructure*³⁹.
- (3) *District plans^* applying to *urban environments** must enable heights and density of urban form which are ~~equal to~~ commensurate with⁴⁰ the greater of:
- (a) ~~demonstrated~~ relative⁴¹ demand for housing and/or business use in that location⁴², 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**, including its associated infrastructure⁴³.

UFD-P5: Built forms

Territorial Authorities must ensure the⁴⁴ ~~The~~ form and design of subdivision, use and development in *urban environments** is managed so that it:

- (1) contributes to a *well-functioning urban environment**,

³⁶ Submission point 1.2

³⁷ Submission point 2.9

³⁸ Submission point 4.9

³⁹ Submission point 1.3, FS1.2

⁴⁰ Submission points 7.12, 10.1, 12.7

⁴¹ Submission points 7.12, 10.1, 12.7

⁴² Submission points 7.12, 10.1, 12.7

⁴³ Submission point 2.10, FS3.1

⁴⁴ Submission point 10.8

Key

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

- (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 for evaluating unanticipated or out of sequence development⁴⁵

- (1) Unanticipated or out of sequence development will add significantly to *development capacity** where:
 - (a) the location, design and layout of the development will contribute to a *well-functioning urban environment**,
 - (b) the development is well-connected along by a variety of transport modes and⁴⁶; 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 planned upgrades to⁴⁷upgraded 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 practicable⁴⁸.

⁴⁵ Submission points 7.12, 10.1, 10.12, 12.7

⁴⁶ Submission points 2.12, 6.6, FS3.2 and 3.8

⁴⁷ Submission point 7.10

⁴⁸ Submission point 1.4, FS1.3

Key

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

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

UFD-P7: Hapū and iwi involvement in urban development

- (1) Local authorities, in taking account of the principles of Te Tiriti o Waitangi (Treaty of Waitangi) in relation to urban environments, must ensure *planning decisions** 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, and 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 land⁴⁹,
 - (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 support reductions in⁵⁰ ~~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

⁴⁹ Submission points 7.11, 10.10, 12.13, 17.5

⁵⁰ Submission point 11.6

Key

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

(c) requiring best practice⁵¹ 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 are⁵²~~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	<p>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.</p> <p>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 <u>and Horowhenua District Council (with the Wellington Regional Leadership Committee while Horowhenua District Council are part of the Wellington Regional Leadership Committee)</u>⁵³ to jointly prepare and publish <i>Housing and Business Development Capacity Assessments</i>[*] and <i>Future Development Strategies</i>[*].</p>
Who	Regional Council and <i>Territorial Authorities</i> [*]
Links to Policy	This method implements UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P7 and UFD-P8.
Target	<ul style="list-style-type: none"> Information collected on development and <i>infrastructure</i>[^] trends and pressures in the Region. Monitoring and reporting undertaken that meets the requirements of the NPS UD.

⁵¹ Submission points 7.13, 17.6

⁵² Submission point 13.6

⁵³ Submission point 17.7

Key

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

Method 2	Strategic planning
Description	<p>The aim of this method is to undertake strategic planning to meet the objectives and policies of this Chapter.</p> <p>The Regional Council, together with Palmerston North City Council <u>and Horowhenua District Council (through the Wellington Regional Leadership Committee</u> while Horowhenua District Council are part of the <u>Wellington Regional Leadership Committee</u>)⁵⁴, 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 <u>and Horowhenua District Council (through the Wellington Regional Leadership Committee</u> while Horowhenua District Council are part of the <u>Wellington Regional Leadership Committee</u>)⁵⁵ will jointly prepare <i>Future Development Strategies</i>*.</p> <p>Other <i>Territorial Authorities</i>*, together with the Regional Council, will undertake strategic planning to meet the objectives and policies of this Chapter through similar, but appropriately scaled approaches. This includes the use of structure plans for greenfield residential developments.</p> <p>These strategies will enable decision-making to be based on sufficient information to:</p> <ul style="list-style-type: none"> (a) coordinate the intensification of <i>urban environments</i>* and the development of extensions to <i>urban environments</i>* with <u>regional council and territorial authority</u>⁵⁶ <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). <p>The above may involve the preparation of spatial plans as a method for applying an integrated strategic planning approach.</p> <p><u>Councils will generally plan and fund for future urban development through their Infrastructure Strategies and Long-term Plans (LTPs). In most cases, facilitating urban development is best done by planning and funding lead infrastructure through the LTP processes, however where necessary or appropriate Councils may seek alternative funding sources outside the LTP. Ultimately, if Councils do not plan for residential growth through the LTP this can result in unplanned or constrained residential growth.</u></p>

⁵⁴ Submission point 17.8

⁵⁵ Submission point 17.8

⁵⁶ Submission point 11.3

Key

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

	<p>Methods to achieve <i>active transport*</i> and <i>public transport*</i> strategic outcomes will include providing <i>public transport*</i> services, increasing accessibility via <i>active transport*</i> and micro-mobility devices such as e-bikes and e-scooters, and by implementing the Regional Public Transport Plan.</p> <p>Methods to achieve <i>climate change^</i> strategic outcomes will include having regard to targets set in the New Zealand Emissions Reduction Plan in decision-making.</p> <p>The Regional Council and <i>Territorial Authorities*</i> will engage with hapū and iwi when undertaking strategic planning to meet the objectives and policies of this Chapter, including to ensure <i>urban environments*</i> enable Māori to express their cultural traditions and norms.</p>
Who	Regional Council and <i>Territorial Authorities*</i>
Links to Policy	This method implements UFD-P1 to UFD-P8.
Target	<ul style="list-style-type: none"> • Urban development strategic planning documents prepared. • Requirements of the NPS UD met.

Method 3	<i>District plans^</i>
Description	<p>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.</p> <p><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>.</p> <p><i>Territorial Authorities*</i> may use methods such as Development Contributions Policies and Stormwater Management Plans to ensure the coordinated and efficient provision of new development, <i>development infrastructure*</i> and <i>additional infrastructure*</i>.</p>
Who	Regional Council and <i>Territorial Authorities*</i>
Links to Policy	This method implements UFD-P1 to UFD-P8.
Target	<ul style="list-style-type: none"> • <i>District plan^</i> changes, if necessary. • Regional Council submissions to <i>Territorial Authorities*</i> on proposed <i>district plan^</i> changes.

Method 4	Advocacy
Description	Easily accessible information will be developed and made available to: (a) raise awareness and understanding of natural hazards, <i>greenhouse gas^</i> reductions, and <i>climate change^</i> , and

Key

One Plan wording to be retained	Black
Notified One Plan wording to be removed	Black with strikethrough
Notified changes	Purple
S42A recommended changes – new text	Blue text underlined
S42A text to be removed	Blue with strikethrough
S42A rebuttal evidence – new text	Black text underlined

	<p>(b) advocate infill and intensification as a more sustainable urban development option than greenfield development and urban expansion.</p> <p>Work plans to reduce emissions and adapt to <i>climate change</i>[^] will be developed and made available, to raise awareness and understanding.</p> <p>Other methods will include:</p> <p>(a) providing guidance on integrating <i>land</i>[*] use with <i>development infrastructure</i>[*] and <i>additional infrastructure</i>[*], and for delivering high quality urban design, and</p> <p>(b) preparing and disseminating information to raise awareness and understanding of ways to achieve <i>well-functioning urban environments</i>[*].</p> <p>Where appropriate, the Regional Council will <u>promote and</u>⁵⁷ advocate the objectives and policies in this chapter to external agencies that contribute to shaping urban form and development, such as Kāinga Ora.</p>
Who	Regional Council and <i>Territorial Authorities</i> [*]
Links to Policy	This method implements UFD-P4, UFD-P5, UFD-P7 and UFD-P8.
Target	<ul style="list-style-type: none"> • 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 highly productive land^{*58} versatile soils

The RMA requires those with functions under it to have regard to resource costs and benefits of development. For example, directing urban growth and rural residential *subdivision*^{*} away from highly productive land^{*} ~~onto less versatile soils~~ may increase travel distances, costs of service provision or other economic or environmental costs of *land*^{*} development. However, allowing urban expansion onto highly productive

⁵⁷ Submission point 17.9

⁵⁸ Submission points 7.7, 10.2, 12.19

Key

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

~~land versatile soils~~ adjacent to urban areas will result in a reduction of options for their future productive use, which is a cost to future generations. There are a range of factors required to enable *land** to be used for productive use. *Territorial Authorities** need to weigh all relevant matters when making *land** use decisions.

UFD-PR3: Urban form, function and development

Objectives UFD-O1, UFD-O3 to UFD-O5, along with Policies UFD-P1 to UFD-P2 and UFD-P4 to UFD-P8, give effect to the requirements of the National Policy Statement on Urban Development 2020 and are intended to achieve its objectives. The intended results include the provision of *well-functioning urban environments** and improvements to the responsiveness and competitiveness of *land** and development markets. Provisions in this chapter also seek to ensure urban development positively impacts the quality of *urban environments**, the quality of life for residents and the quality of the natural environment.

Anticipated Environmental Results

Anticipated Environmental Result	Link to Policy	Indicator	Data Source
UFD-AER1: Urban growth occurs in a strategically planned manner.	UFD-P1	<ul style="list-style-type: none"> Urban growth 	<ul style="list-style-type: none"> <i>District plan^</i> variations and changes
UFD-AER2: Highly productive land* 59 is Class 1 and 11 versatile soils are retained, where appropriate for productive use.	UFD-P3	<ul style="list-style-type: none"> Urban growth and rural residential <i>subdivision*</i> 	<ul style="list-style-type: none"> <i>District plan^</i> variations and changes
UFD-AER3: Urban intensification is achieved.	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	<ul style="list-style-type: none"> Urban intensification <i>Housing bottom lines*</i> achieved 	<ul style="list-style-type: none"> <i>District plan^</i> variations and changes NPS UD monitoring requirements
UFD-AER4: <i>Development infrastructure*</i> is in place in time to facilitate urban intensification or expansion	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	<ul style="list-style-type: none"> Urban intensification and growth 	<ul style="list-style-type: none"> <i>District plan^</i> variations and changes
UFD-AER5: New developments maximise energy and transport efficiency.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> Solar energy provisions in <i>district plans^</i> Increases in <i>active transport*</i> and <i>public transport*</i> 	<ul style="list-style-type: none"> <i>District plan^</i> variations and changes Regional Land Transport Plan indicator monitoring Census: main means of travel

⁵⁹ Submission points 7.7, 10.2, 12.20
AS-030235-422-92-V1-e

Draft only – not Council policy

Key

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

Anticipated Environmental Result	Link to Policy	Indicator	Data Source
UFD-AER6: Risks due to the impacts of <i>climate change</i> [^] are minimal to new developments.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> Urban intensification and growth 	<ul style="list-style-type: none"> <i>District plan</i>[^] variations and changes

Key

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

Definitions to be added to One Plan

Active transport	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means forms of transport that involve physical exercise, such as walking or cycling, and includes transport that may use a mobility aid such as a wheelchair.</p>
Additional infrastructure	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means:</p> <ul style="list-style-type: none"> (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	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means land that is zoned, or identified in an FDS or similar strategy or plan, for business uses in urban environments, including but not limited to land in the following:</p> <ul style="list-style-type: none"> (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	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means any of the following zones:</p> <ul style="list-style-type: none"> (a) city centre zone (b) metropolitan centre zone (c) town centre zone (d) local centre zone (e) neighbourhood centre zone

Key

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

Community services	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the following:</p> <ul style="list-style-type: none"> (a) community facilities (b) educational facilities (c) those commercial activities that serve the needs of the community.
Development capacity	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the capacity of land to be developed for housing or for business use, based on:</p> <ul style="list-style-type: none"> (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	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the following, to the extent that they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002):</p> <ul style="list-style-type: none"> (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	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means:</p> <ul style="list-style-type: none"> (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 Strategy	<p>has the same meaning as in the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the Future Development Strategy required by subpart 4 of Part 3.</p>
Highly Productive Land⁶⁰	<p><u>has the same meaning as in the National Policy Statement for Highly Productive Land 2020 (as set out below)</u></p>

⁶⁰ Submission point 14.6
AS-030235-422-92-V1-e

Key

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

	<u>means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)</u>
Housing and Business Development Capacity Assessment	has the same meaning as in the National Policy Statement on Urban Development 2020 (as set out below): 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.
<u>Nationally significant infrastructure</u>⁶¹	<u>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</u> <u>means all of the following:</u> (a) <u>State highways</u> (b) <u>The national grid electricity transmission network</u>

⁶¹ Submission point 1.5, FS1.4
AS-030235-422-92-V1-e

Key

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

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

Key

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

	<p>(f) a heritage order (g) a water conservation order</p>
Public transport	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means any existing or planned service for the carriage of passengers (other than an aeroplane) that is available to the public generally by means of:</p> <p>(a) a vehicle designed or adapted to carry more than 12 persons (including the driver), or (b) a rail vehicle, or (c) a ferry.</p>
Short term	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means within the next 3 years.</p>
Sufficient development capacity	<p>has the same meaning as in clauses 3.2(2) and 3.3(2) of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means development capacity that must be the following in order to meet expected demand for housing and business land:</p> <p>(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.</p>
Urban environment	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:</p> <p>(a) is, or is intended to be, predominantly urban in character; and (b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.</p>
Well-functioning urban environments	<p>has the same meaning as in Policy 1 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>well-functioning urban environments are urban environments that, as a minimum:</p>

Draft only – not Council policy

Key

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

	<p>(a) Have or enable a variety of homes that:</p> <ul style="list-style-type: none">(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 <p>(b) have or enable a variety of <i>sites</i>* that are suitable for different business sectors in terms of location and <i>site</i>* size; and</p> <p>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</p> <p>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p>
--	---