

**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**)

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**SECTION 42A REPORT OF LEANA SHIRLEY  
ON BEHALF OF MANAWATŪ-WHANGANUI REGIONAL COUNCIL**

**PLANNING  
1 DECEMBER 2023**

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## **A. EXECUTIVE SUMMARY**

1. This report considers submissions received by Manawatū-Whanganui Regional Council (**the Council** or **Horizons**) on Proposed Plan Change 3 (Urban Development) (**PC3**), which is a plan change that has been prepared in respect of the Regional Policy Statement (RPS) part of the Council's One Plan.
2. This Proposed Plan Change has been prepared in accordance with the process set out in Schedule 1 of the Resource Management Act 1991 (**RMA**).
3. A total of 19 submissions and 3 further submissions were received by the Council on the Plan Change. The submissions addressed a range of matters, and generally speaking these were specific to the proposed provisions. The submissions raise issues in respect of the following topics, which are addressed in this report:
  - (a) Regionally/nationally significant infrastructure;
  - (b) Territorial authority matters;
  - (c) National Policy Statement for Highly Productive Land (**NPS-HPL**) 2022 matters;
  - (d) Public and active transport;
  - (e) Climate change adaption.
4. Other topics raised in submissions and addressed in this report include:
  - (a) Compliance with the National Policy Statement for Freshwater Management (**NPS-FM**) 2020 and freshwater matters;
  - (b) Provisions for expansion and business land (incorporated into Territorial Authority matters);
  - (c) Providing for out of sequence development and housing (incorporated into Territorial Authority matters).
5. For the reasons outlined in this report, I consider that the overarching issues, Objectives, Policies and Methods, including the recommended amendments are the most appropriate way to:

- (a) Give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**);
  - (b) Provide higher order direction to guide district plan development and plan changes (which is the function of an RPS);
  - (c) Achieve the relevant objectives of the RPS in respect to the proposed provisions;
  - (d) Ensure consistency at a high level with the NPS-HPL, noting that this plan change is not for the purpose of giving effect to the regional mapping exercise required by the NPS-HPL;
  - (e) Ultimately, achieve the purpose of the RMA.
6. Having considered all submissions, and given further consideration to relevant matters as well as all relevant statutory and non-statutory documents, I recommend PC3 be accepted with the amendments set out in Appendix 1 of this report.
7. I have also undertaken a s 32AA evaluation for the amendments I have recommended to the proposed provisions, and this is set out in Section K.

**B. INTRODUCTION**

8. My name is Leana Mary Shirley. I am contracted as a Senior Planner in both the Policy Team and Transport Team for the Council. I have held my Policy Team role for 2 ½ years. I have held the contract role of Senior Planner to the Transport Team for 5 years. During this time, I have also assisted the Council’s Consents Team on an ad-hoc basis.
9. Prior to contracting to Horizons Transport, Policy and Consents Teams, I worked in the following roles at Horizons:
- (a) Senior Transport Planner for 1 ½ years;
  - (b) Senior Consents Planner for 3 years;
  - (c) Consents Planner for 5 ½ years;
  - (d) Consents Planner (cadet) for 2 years.
10. In addition to the above, I was seconded to the Policy Team for nine months in 2014-2015 to assist with implementation of the One Plan, and I have worked on a contract basis to Phocus Planning (based in Palmerston North) and JC Environmental Ltd. In total I have approximately 16 years’ experience in various planning roles.
11. I have a Bachelor of Applied Science majoring in Natural Resource Management from Massey University. I am a certified resource management hearings commissioner having completed the WSP Making Good Decisions foundation course in 2013 and recertifying 3-5 yearly since, with my most recent recertification being 2021.
12. My involvement in PC3 began in June 2023, when I assumed responsibility as the lead planner on this project. Although I was not directly involved in the preparation of the s 32 report or the provisions for PC3, I have become familiar with the process followed and all of the relevant material prior to my involvement. My role has included organising the appointment of the hearing panel, attending and participating in pre-hearing meetings, and drafting this s 42A report.
13. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023.

14. Statements expressed in this evidence are made within the scope of my expertise. I confirm that I have stated the reasons for my opinions I express in this report, and considered all the material facts that I am aware of that might alter or detract from those opinions. I have all the information necessary to assess PC3 (within the scope of my expertise) and am not aware of any gaps in that information or my knowledge.

**C. SCOPE**

15. This s 42A report:
- (a) Describes the background to PC3 and the procedural steps taken by Horizons in respect of it, to the extent that these matters are not already covered in the s 32 report;
  - (b) Outlines the submissions and further submissions received by Horizons on PC3;
  - (c) Details my assessment of those submissions and recommendations in respect of them;
  - (d) Considers any recommended changes to the PC3 arising from submissions under s 32AA of the Act; and
  - (e) States my overall recommendations to the Hearing Panel in respect of PC3.

**D. BACKGROUND**

16. The Government published the NPS-UD in July 2020, replacing the former National Policy Statement on Urban Development Capacity 2016. The 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 for the planning of well-functioning urban environments. It is intended to improve the responsiveness and competitiveness of land and development markets, improve resilience to climate change, and ensure planning decisions relating to urban environments take into account Te Tiriti o Waitangi.
17. Following publication of the NPS-UD, Horizons began drafting changes to the RPS portion of the One Plan to give effect to the new policy statement. PC3 is the result of that process. It has a narrow focus and seeks to give effect to the NPS-UD for the Manawatū-Whanganui Region.

18. Horizons has followed the RMA Schedule 1 process in the development of PC3. Key steps involved:
- (a) Pre-notification engagement with iwi and identified stakeholders in 2021. Sections 5.1, 5.2 and Appendix B of the s 32 report provide detail on pre-notification engagement, including the parties engaged, their feedback and Council's response;
  - (b) Preparation of a s 32 report and draft provisions;
  - (c) Public notification of Proposed PC3 in accordance with Clause 5, Schedule 1 of the RMA;
  - (d) Public notification of submissions summary for further submissions; and
  - (e) Pre-hearing meetings with submitters to clarify relief sought.
19. Council initiated PC3 primarily to give effect to the NPS-UD. It includes:
- (a) Setting objectives and policies for the provision of sufficient development capacity to meet the expected demand for housing and business land, and for the planning of well-functioning urban environments, including:
    - (i) Supporting and enabling improved responsiveness and competitiveness of land and development markets;
    - (ii) Supporting improvements to urban environments' resilience to climate change; and
  - (b) Ensuring planning decisions relating to urban environments take into account Te Tiriti o Waitangi.
20. The operative One Plan RPS provides direction to integrate growth management of the built environment with the provision of infrastructure, through Objectives, Policies and Methods. The s 32 report is clear that PC3 is limited in its focus to achieve what is necessary to give effect to the NPS-UD. It also states that where there are matters relating to urban growth (directly or indirectly) already addressed in the RPS provisions, these have been preserved pending further substantive review. The new provisions



proposed by PC3 will exist alongside the existing RPS Objectives and Policies of the One Plan, and those existing provisions will also apply to urban development (if they are relevant).

21. PC3 proposes amendments and additions to Chapter 3 of the One Plan RPS. A summary of the changes is outlined below:

<b>Operative RPS provision</b>	<b>Replaced or partially replaced by PC3</b>
Scope and Background	Addition of new paragraphs to include urban development context.
Issue 3-3	UFD-I1: Strategic Planning and Land Use
Issue 3-4	UFD-I2: Adverse effects from urban growth and rural residential subdivision on versatile soils.
Objective 3-3	UFD-O1: Strategic planning and urban development.
Objective 3-4	UFD-O2: Urban growth and rural residential subdivision on versatile soils
Policy 3-4	UFD-P1: Integration of infrastructure with land use
Policy 3-5	UFD-P3: Urban Growth and rural residential subdivision on versatile soils
Policy 3-7(b)–(c)	UFD-P8: Urban development and climate change
Principal reason 3.7.1	UFD-PR1 Strategic urban development
Principal reason 3.7.2	UFD-PR2 Urban growth and rural residential subdivision on versatile soils
<b>New provisions proposed through PC3</b>	
UFD-I3 Demand for housing, business land, infrastructure, and community services	
UFD-O3 Urban form and function	
UFD-O4 Urban development and the Treaty of Waitangi ( <i>Te Tiriti o Waitangi</i> )	
UFD-O5 Urban development and climate change	
UFD-P2 Providing sufficient development capacity	
UFD-P4 Urban intensification and expansion	

UFD-P5 Built forms
UFD-P6 Significant development capacity criteria
UFD-P7 Hapū and iwi involvement in urban development
Methods 1, 2, 3 and 4
Principal reason UFD-PR3

*Table 1: PC3 summary of notified amendments to the One Plan*

22. Wider amendments and updates to the operative RPS will be proposed as part of a programme commencing with the freshwater (Oranga Wai) planning process in 2024 and Highly Productive Land mapping in 2025, as required by the NPS-FM and NPS-HPL.

#### **E. SUBMISSIONS**

23. PC3 was notified on 17 October 2022, submissions were received by 15 November 2022, and further submissions were received by 28 February 2023.
24. Horizons received 19 submissions in respect of PC3 and 3 further submissions. Submissions were received from:

<b>Submitter name</b>	<b>Submission number</b>
Transpower New Zealand Limited	S1
Waka Kotahi	S2
Ministry of Education	S3
KiwiRail	S4
Wellington Fish and Game Council	S5
Summerset Group Holdings Ltd	S6
Horowhenua District Council	S7
Dr Sharon Stevens	S8
Marilyn & Bruce Bulloch	S9
Manawatū District Council	S10
Palmerston North City Council	S11
Rangitīkei District Council	S12
Dr Chris Teo-Sherrell	S13

Fonterra Ltd	S14
New Zealand Defence Force	S15
Robert McLachlan	S16
Kāinga Ora – Homes and Communities	S17
Philip John Lake	S18
National Public Health: MidCentral, Te Whatu Ora, Health New Zealand	S19

*Table 2: Submissions received on PC3*

25. The submission from National Public Health: MidCentral, Te Whatu Ora, Health New Zealand was received on 17 November 2022, two days after the submission closing date of 15 November 2022. A decision to waive the timeframe and accept the submission was made under delegated authority by Dr Nic Peet (then Horizons Group Manager) under s 37 of the RMA. A copy of this decision can be provided on request.

26. Further submissions were received from:

<b>Submitter name</b>	<b>Submission number</b>
New Zealand Defence Force	FS1
Fonterra Ltd	FS2
Kāinga Ora – Homes and Communities	FS3

*Table 3: Further submissions received on PC3*

27. The following topics were observed across multiple submissions:

- (a) Regionally and/or nationally significant infrastructure, including reverse sensitivity effects from urban development on this infrastructure;
- (b) Territorial authority matters, including clarification on the roles and responsibilities of territorial authorities versus Regional Council;
- (c) Compliance with the NPS-HPL;
- (d) Public and active transport; and
- (e) Climate change adaption.

28. Individual submitters also raised questions and issues in relation to:
- (a) Freshwater quality impacts from urban development;
  - (b) Provisions associated with business land;
  - (c) Enabling papakāinga on land regardless of whether it is on Māori title.

**F. PROCEDURAL MATTERS**

29. The Kāinga Ora further submission was received by Horizons within the 10 working day timeframe specified. However, a copy of the further submission was not served on other parties in this timeframe. Whether to grant a waiver in respect of the default in relation to service of this document is a matter for consideration by the Hearing Panel under s 37A.

**G. SCOPE ISSUES**

30. There are two issues of scope associated with PC3. The first revolves around the NPS-HPL and the extent to which provisions can be incorporated in PC3 to give effect to the NPS-HPL. The second relates to the requested inclusion of wording to ensure that growth improves freshwater quality<sup>1</sup>.
31. In relation to the NPS-HPL issue, some submitters<sup>2</sup> requested that PC3 be amended to reference highly productive land, and to ensure PC3 does not frustrate or conflict with the NPS-HPL. Others sought more detailed changes which would see elements of the NPS-HPL be 'given effect to' in PC3.
32. In my view, what can sensibly be achieved in PC3 is constrained. PC3 was not prepared or notified to propose changes that would directly give effect to the NPS-HPL. In saying that, I accept that PC3 cannot ignore the provisions of the NPS-HPL and should not create additional conflicts or inconsistencies with the NPS-HPL, as PC3 must be prepared in accordance with the contents of any national policy statement.

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<sup>1</sup> Submission 5

<sup>2</sup> Submissions 7, 9, 10, 12, 13, 14, 19

33. One amendment that can (and in my opinion should) be made to PC3 is to replace references to ‘versatile soils’ with the expression ‘highly productive land’ as defined in the NPS-HPL. The two terms are different: ‘highly productive land’ (currently) refers to all LUC Class 1, 2 and 3 soils, and ‘versatile soils’ in the One Plan refers only to Classes 1 and 2. However, in my view, adopting the NPS-HPL definition would help to avoid the continuation of a fundamental ‘policy mismatch’ between the NPS-HPL and the One Plan. It would also help mitigate the concern that PC3 was moving counter to the direction of the NPS-HPL in relation to urban development of highly productive land. However, I accept that the question of scope is a matter for the Hearing Panel, so this recommendation is still subject to there being scope to make this change.
34. As noted above, some of the requests of other submitters would go further than the NPS-HPL in constraining the use of ‘highly productive land’. It is my view that these aspects of the submission are not “on” the plan change and are therefore out of scope. The reasons for this view include the fact that the regional issues relating to highly productive land, which will necessarily be relevant to the consideration of how the RPS gives effect to the NPS in this region, have not been the subject of consideration in the preparation of this plan change and are not documented in the s 32 report.
35. The second scope issue relates to maintaining and improving freshwater quality as part of urban development. I am also of the view that this goes beyond what the NPS-UD requires, and is out of scope for PC3 in the sense that these aspects of the submissions are not “on” the plan change.
36. In my view, to require improvement of the natural environment through urban development appears to go beyond the intent of the NPS-UD objectives (and may not be compatible). The s 32 report is clear that the scope of this plan change is *“limited to what is required to give immediate effect to the NPS-UD and where there are other matters relating to urban growth (directly or indirectly) already addressed in the One Plan RPS provisions, these have been preserved pending further, substantive review”*.
37. The PC3 provisions will be read alongside the operative One Plan provisions – they work together. This means the land use and water quality provisions included in Chapters 4 and 5 will still apply to urban development in the region. In addition, Horizons is in the process of undertaking a review of the One Plan to respond to other national

instruments – namely the NPS-FM 2020. It is important that PC3 does not frustrate or pre-empt the outcomes of the freshwater plan review underway at present.

#### **H. PRE-HEARING MEETINGS**

38. Pre-hearing meetings were held with submitters on five topics, with an individual meeting held with one submitter. These are detailed below.

##### **Topic 1: Regionally and nationally significant infrastructure:**

39. In addition to Horizons staff and the meeting facilitator, attendees at this pre-hearing meeting were:

- (a) KiwiRail;
- (b) Waka Kotahi;
- (c) Transpower New Zealand Limited;
- (d) Horowhenua District Council; and
- (e) MidCentral, Te Whatu Ora, Health New Zealand.

40. The focus of this pre-hearing meeting was the interaction between PC3 and infrastructure of regional and national significance. The points discussed included:

- (a) Reverse sensitivity and effects of urban intensification and urban expansion on existing nationally significant infrastructure assets, including the ability to maintain, repair or upgrade these assets;
- (b) Including the NPS-UD definition of nationally significant infrastructure;
- (c) Additional wording to include operation, maintenance and upgrading of nationally significant infrastructure in UFD-O3 and UFD-P4;
- (d) Minor wording amendments to UFD-P4 and UFD-P6 to ensure alignment with the National Policy Statement on Electricity Transmission (NPTS-ET).

41. Agreement was reached on a number of points at this pre-hearing meeting, which have resulted in recommended changes to the PC3 provisions. The agreed outcomes from the pre-hearing meeting on Topic 1 include:
- (a) Inclusion of the NPS-UD definition of Nationally Significant Infrastructure to support UFD-O3 and UFD-P4. All parties at the pre-hearing meeting supported inclusion of this definition as it aligns with the NPS-ET and provides certainty for those applying the provisions. At the meeting, I noted the existing One Plan provisions, Objective 3-1 and Policies 3-1 and 3-2 which relate to infrastructure and other physical resources of regional or national importance. Policy 3-1 in particular includes a list of infrastructure considered to be physical resources of regional or national importance. PC3 does not propose changes to Objective 3-1 and Policies 3-1 and 3-2. It is therefore important that inclusion of the NPS-UD definition as part of PC3 would not duplicate or conflict with these existing provisions. It is my opinion that inclusion of the NPS-UD definition for Nationally Significant Infrastructure will not directly conflict or cause inconsistency with Objective 3-1, or Policies 3-1 and 3-2 of the One Plan.
  - (b) Amendments to UFD-I1 and UFD-I3 to recognise the issue of urban development creating reverse sensitivity effects on infrastructure of national importance.
  - (c) Amendments to UFD-O3 to avoid the creation of reverse sensitivity effects on nationally significant infrastructure and infrastructure of national or regional importance.
  - (d) Amendments to UFD-P1 and UFD-P6 to provide more guidance for infrastructure upgrades that can or will be made (i.e. not requiring these as a pre-requisite).
  - (e) Amendments to UFD-P4 to provide for the operation, maintenance and upgrade of nationally significant infrastructure.
42. Following the pre-hearing meeting, amendments to the provisions as discussed and agreed at the pre-hearing meeting were circulated to parties.

## Topic 2: Territorial Authority matters

43. In addition to Horizons staff and the meeting facilitator, attendees at this pre-hearing meeting were:
- (a) Horowhenua District Council;
  - (b) Manawatū District Council;
  - (c) Rangitīkei District Council;
  - (d) Fonterra; and
  - (e) Palmerston North City Council.
44. Topics discussed at this pre-hearing meeting revolved around a number of matters that impact territorial authorities in their planning and provision of urban development. Specific matters discussed included:
- (a) The importance of enabling urban development capacity and including this as an issue as part of the “Big four” issues identified in the One Plan (including it as the fifth issue).
  - (b) The need for the One Plan to clarify what is meant by ‘strategic planning’, including recognition in PC3 of the role Horizons plays in provision of public transport and flood protection infrastructure and consenting of three waters infrastructure.
  - (c) The need for PC3 to provide a better description of the characteristics of the region, given there are no Tier 1 authorities and provision for urban growth in this context requires a different approach to regions with larger or more urban environments.
  - (d) The need for PC3 to provide flexibility around provision of public transport to ensure growth proposals are not prevented because public transport (a regional council function) has not been planned at the time of the proposal. Submitters are seeking that public transport be enabled by the growth proposal (thereby



future proofing that area) which then allows the regional council to plan and deliver public transport in response to that growth proposal.

- (e) Replication and duplication of NPS-UD objectives and policies with variations in language used through PC3. The discussion revolved around the fact that in some cases PC3 relies on the NPS-UD wording and in others creates a different variation of that wording. The view of submitters is that there should be consistency. The territorial authority submitters were asked to review the notified provisions and identify the areas where they thought inconsistent wording is being used, with a link to the relevant point(s) in their submission to determine scope.
- (f) UFD-O3(1)(c) and UFD-P4(1)(b) include the words “relates well to its surrounding environment” which submitters consider to be an amenity value and dealt with by district councils and not appropriate to include in the RPS.
- (g) The need for business land to be included alongside land for housing in Objective UFD-O3 and UFD-P4(1).
- (h) The need for UFD-P4 to better recognise the role smaller settlements play in meeting future demand for housing - the view being that UFD-P4 should clearly provide for both intensification and expansion in provision of housing land. Following that, clauses (1) and (2) of UFD-P4 should detail how intensification and expansion should be achieved.

45. A number of outcomes were agreed through this pre-hearing. These are detailed in the analysis of submissions below and in the amended provisions attached as Appendix 1 to this report. Following the pre-hearing meeting attendees representing the territorial authorities provided a marked up version of the notified provisions with their suggested amendments in light of the above points. My recommendations on each of these changes is outlined in my analysis of submissions under the theme ‘territorial authority matters’.

### **Topic 3: Consistency with the NPS-HPL**

46. Attendees were:

- (a) Horowhenua District Council;
  - (b) Manawatū District Council;
  - (c) Rangitīkei District Council;
  - (d) Fonterra; and
  - (e) National Public Health Service (MidCentral, Te Whatu Ora, Health New Zealand).
47. The focus of this pre-hearing meeting was the interaction between PC3 and the National Policy Statement for Highly Productive Land (NPS-HPL) 2022. The NPS-HPL which was gazetted in September 2022 and took effect on 17 October 2022, coincidentally the same day PC3 was notified. A number of submitters sought changes to PC3 to provide consistency with the NPS-HPL and ensure PC3 does not conflict with it. Matters discussed at the pre-hearing meeting revolved around the extent to which PC3 can and should give effect to the NPS-HPL, including discussions as to scope (which I address above from my viewpoint).
48. The key outcome from this pre-hearing was the agreement that all references in PC3 to “versatile soils” should be replaced with ‘*Highly Productive Land*’ with the NPS-HPL definition of ‘*Highly Productive Land*’ included in PC3. This agreement was reached subject to the availability of scope to make this change.

#### **Topic 4: Public and Active transport**

49. In addition to Horizons officers and the meeting facilitator, attendees were:
- (a) Waka Kotahi;
  - (b) Horowhenua District Council; and
  - (c) National Public Health Service (MidCentral, Te Whatu Ora, Health New Zealand).
50. This prehearing meeting focused on the relationship of urban development and planning and delivery of public transport. Parties sought to ensure the PC3 wording did

not foreclose future development options to due to the absence of existing or planned public transport (which is the responsibility of regional councils). Parties also sought to ensure PC3 provides adequately for a variety of transport modes (not just public transport) in urban development.

51. In relation to provision of public transport, it was agreed at the pre-hearing meeting that PC3 should be amended to require development to 'enable' well-connected public transport as an option (as an alternative to 'planned' or 'existing' as the notified wording suggested). This is to ensure the urban development and expansion process is not unduly delayed should regional council transport planning not have public transport planned (in their land transport plans) or in place for that area. This relates to UFD-O3(1)(c) and (d), UFD-O3(2)(b) and UFD-P4(1)(d).
52. It was also agreed that PC3 should ensure development is well-connected by a variety of transport modes and ensure the infrastructure necessary to support active transport is provided.
53. Amendments were made to the provisions based on these agreements and circulated to parties prior to completion of this report.

#### **Topic 5: Climate change adaptation**

54. In addition to Horizons officers and the meeting facilitator, attendees were:
  - (a) Waka Kotahi;
  - (b) Horowhenua District Council;
  - (c) Palmerston North City Council;
  - (d) Fish and Game NZ;
  - (e) National Public Health Service (MidCentral, Te Whatu Ora, Health New Zealand);
  - (f) Fonterra; and
  - (g) Robert McLachlan.

55. The theme of this pre-hearing meeting was climate change and adaptation matters as raised through submissions, however discussion also address water quality maintenance and enhancement. Specific topics discussed included:
- (a) The request for PC3 to incorporate environmental outcomes that maintain or improve (where degraded) water quality in urban environments.
  - (b) The conflict between urban growth and carbon emissions, noting that growth of any extent will involve some degree of additional greenhouse gas emissions. Submitters were keen to ensure PC3 recognises this by being clear that urban growth and development should support reductions in greenhouse gas emissions. This relates to UFD-P8(1).
  - (c) Whether UFD-P8 should include the wording “as far as practicable” in relation of minimising contributions to climate change.
  - (d) Clarification of what ‘best practice resilience’ means in the context of UFD-P8(1)(c).
  - (e) Provision for emergency water supplies as part of climate change resilience in UFD-P8.
56. Agreement was reached in relation to adding the wording ‘support reductions in greenhouse gas emissions’<sup>3</sup> in UFD-P8(1).
57. No specific agreement was reached on the other matters discussed at the pre-hearing meeting, other than consideration of whether PC3 could or should be amended to address the maintain/not worsening element of Fish & Game’s submission on water quality.
58. Further consideration was to be given to the other matters discussed and any amendments circulated to parties prior to inclusion in this s42A report. Accordingly, amendments were circulated to parties on 30 October 2023.

**Individual meeting: Chris Teo-Sherrell (submitter no. 13)**

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<sup>3</sup> Underlined text represents new proposed wording. Deleted text is shown as ~~strikethrough~~

59. An individual meeting was held with Dr Chris Teo Sherrell to discuss the matters raised in his submission. Prior to the meeting, I circulated my initial views on his submission points and some suggested amendments to provisions for his consideration.

Agreed amendments:

60. We discussed my initial thoughts and recommendations. It was noted that I agree with those submission points, numbered 13.1, 13.2 and 13.6 and recommend that the wording in the scope and background, UFD-I2 and UFD-P8(2) be amended as requested.

Highly productive land

61. Submission points 13.3, 13.4 and 13.5 request amendments to ensure versatile soils are protected as a priority from urban development. We discussed the NPS-HPL and that it provides for protection of highly productive land (incorporating Class 1, 2 and 3 soils in the NPS-HPL). It was noted that the NPS-HPL has effect (from October 2022) and the directions of the NPS-HPL apply to the use of highly productive land already.
62. The NPS-HPL directs regional councils to map highly productive land and notify these areas (as maps) in a proposed regional policy statement no later than 22 October 2025. I advised that at this time, Horizons is in the early stages of planning this work to implement the NPS-HPL, and is exploring mapping options, and has not yet indicated a specific time as to when it plans to notify a proposed plan change to give effect to the NPS-HPL.
63. We discussed that PC3 was drafted and notified prior to the NPS-HPL being gazetted and was not prepared with the intention of directly giving effect to the NPS-HPL, nor could it have been. Furthermore, Horizons does need to, and intends to go through a plan change process to give effect to the NPS-HPL to perform the tasks required for its implementation. I communicated to the submitter my view that adopting the amendments requested in this submission would go beyond the scope of what was notified in PC3.
64. We then discussed the use of the term 'versatile soils' in PC3 and its potential to conflict with the language used in the NPS-HPL. The scope to amend 'versatile soils' references to 'highly productive land', is possible based on this submission and others, in my

opinion. I advised that this recommendation is on the basis that no new requirements or constraints would be imposed by adopting the NPS-HPL definition. Nor will it create conflict with any other sections of the One Plan. I accept the general point that RPS provisions related to the interactions between urban development and versatile soils should be made consistent, to the extent possible. However, this is subject to a legal advice to ensure there is scope to make this change.

65. It was my understanding Dr Teo-Sherrell was accepting of the scope limitations of PC3 associated with highly productive land and acknowledged that the requested amendments in submission points 13.3, 13.4 and 13.5 are better addressed in the separate plan change required to give effect to the NPS-HPL.
66. The above was circulated to Dr Teo Sherrell as a meeting record. His response advised he was supportive of the approach discussed but reserved his right to amend his position should new information or changes come to light between now and the hearing.

**I. SUMMARY OF KEY THEMES/ISSUES**

67. This section of the report sets out key themes that were identified following the receipt of submissions and further submissions, and as discussed in pre-hearing meetings.
68. In total of approximately 145 submission points and 31 further submission points were received on the provisions of PC3 seeking a range of amendments. Key issues and common themes raised by submitters are outlined in table 4 below. These themes were discussed at pre-hearing meetings.

Theme	Key matters/topics raised	Submission number(s)
Nationally and regionally significant infrastructure	<ul style="list-style-type: none"> <li>• There needs to be recognition of reverse sensitivity effects to ensure development near transport corridors can co-exist in an appropriate way and when providing for out of sequence urban growth.</li> <li>• Development must be appropriately located and designed in relation to established infrastructure, and needs to be managed in a way that avoids</li> </ul>	1, 2, 4, 6, 7, 15 FS1, FS2, FS3

Theme	Key matters/topics raised	Submission number(s)
	<p>effects on regionally or nationally significant infrastructure.</p> <ul style="list-style-type: none"> <li>• There is no connection between the existing RPS provisions (for existing infrastructure) and PC3. Better integration is required.</li> <li>• There is no certainty regarding the scope or timing of a future review to ensure greater integration between existing and proposed RPS provisions.</li> <li>• In order to give effect to NPS-ET policies 10 and 11, an amendment is sought to the objective to specifically reference effects on nationally significant infrastructure (as defined in the NPS-UD 2020).</li> <li>• Consideration of the effects of expansion on the national grid.</li> <li>• Some infrastructure due to its linear nature may need to traverse scheduled areas in order to maintain or enhance services. While scheduled locations are always considered as a constraint it may be appropriate to mitigate or offset urban or infrastructure development in these locations in order to achieve the plan’s wider objectives.</li> <li>• Some unanticipated plan changes may not be adjacent to urban environment boundaries. Recognition is needed for the consideration of reverse sensitivity effects both near the urban boundary and elsewhere.</li> <li>• Concerns the reference in the criterion to “as far as reasonably practicable” (UFD-P6) does not give effect to the NPS-ET and is not sufficiently directive to ensure the operation, maintenance and upgrade of the National Grid is not compromised and adverse effects will not result.</li> <li>• Definition of nationally significant infrastructure sought.</li> <li>• Support for provisions recognising the essential link between integrated land use and infrastructure planning.</li> </ul>	

Theme	Key matters/topics raised	Submission number(s)
<b>Territorial authority matters</b>	<ul style="list-style-type: none"> <li>• Lack of clarity and definition on the roles and responsibilities of regional council and territorial authorities.</li> <li>• Needing to provide for development outcomes that 'relate well' to the existing built environment has the potential to stymie opportunities for different development outcomes that the NPS-UD is seeking to enable.</li> <li>• The provision of sufficient development capacity of business land through intensification and expansion is a critical element of a well-functioning urban environment and is consistent with the provisions of the NPS-UD. This is currently absent from UFD-O3.</li> <li>• Questions the approach of PPC3 to greenfield growth and intensification. While policy direction is included for both types of development, PPC3 does not sufficiently differentiate between these outcomes, as seen in UFD-P4 Urban Intensification and Expansion.</li> <li>• Integration of infrastructure with land use should not be the sole responsibility of local territorial authorities. Horizons is responsible for providing flood protection infrastructure.</li> <li>• Request for more guidance in PC3 around a clear and efficient pathway for consenting (for infrastructure) to provide certainty, whilst still recognising the need for environmental standards.</li> <li>• Seek that Levin is included in the housing bottom line table under UFD-P2 and required to have Housing and Business Development Capacity Assessments and Future Development Strategies prepared (Method 2).</li> <li>• Include wording to encourage Horizons Regional Council and Palmerston North City Council to support other territorial authorities to undertake Housing and Business Needs Assessments and Future Development Strategies.</li> </ul>	7, 8, 10, 11, 12, 14, 17, 19



Theme	Key matters/topics raised	Submission number(s)
	<ul style="list-style-type: none"> <li>• Additional wording to ensure papakāinga development is enabled, including on general title land.</li> <li>• Request for planning provisions to promote tiny home development.</li> <li>• More guidance on development of smaller settlements that do not meet the definition of Tier 1, 2 or 3 urban environments.</li> </ul>	
Consistency with the NPS-HPL	<ul style="list-style-type: none"> <li>• Currently development onto versatile soils is resulting in reduction of options for their future use. The word “may” (third paragraph) implies a question of doubt and does not reflect the reality that in the vast majority of cases such land use reduces options for their future productive use.</li> <li>• Recommendation that this section be updated to reflect the NPS-HPL. It is important that towns and settlements that don’t meet the urban environment definition grow in a manner that creates well-functioning communities.</li> <li>• Concerns that the directive nature of the NPS-HPL has the potential to create tension with PC3.</li> <li>• Reword provisions that refer to Class I and II soils to also refer to Class III and change “versatile soils” to “<i>highly productive land</i>”.</li> <li>• UFD-O2 and UFD-P3 are not strong enough and do not reflect the NPS-HPL provisions. Potential conflict between RPS and NPS-HPL.</li> <li>• UFD-O3 - The phrase ‘consider the benefits of retaining class I and II soils’ needs a stronger word than consider.</li> <li>• UFD-P3 – add following wording at end: “<i>and give it a weighting in decision making that would only see it used for urban growth or rural residential purposes in the most exceptional of circumstances</i>”.</li> <li>• UFD-P4 – request protection of versatile soils be mandated with an addition to the policy: “<i>avoids using versatile soils except in the most exceptional of circumstances</i>”</li> </ul>	7, 9, 10, 12, 13, 14 FS3

Theme	Key matters/topics raised	Submission number(s)
Public and active transport	<ul style="list-style-type: none"> <li>• Include active transport under section UFD-03 (2)(b).</li> <li>• That UFD-P4 Include amendments to recognise the importance of connecting active and public transport modes and transport corridors to provide a well-functioning urban environment.</li> <li>• UFD-P4: Suggest a minor wording change to sub clause (4) by way of enabling and encouraging active transport.</li> <li>• UFD-03 &amp; UFD-P4: would prefer to see wording that recognises that greenfield areas in particular should be designed to accommodate future public transport. Clarify that public transport is a regional council function.</li> <li>• Amend references to public transport services/corridors to recognise that public transport may not yet be available to all urban settlements, and require these services to be provided for.</li> <li>• minor amendments suggested to ensure that the connectivity of active and public transport modes and transport corridors, and commercial services (including employment opportunities) is considered when considering unanticipated or out of sequence development.</li> <li>• Future development should be putting public transport and active transport ahead of transport by motor car, whether internal combustion- or electrically powered, to achieve liveability and sustainability objectives.</li> <li>• There are a number of provisions related to development linked to public transport when there is barely any public transport in this Region. Insert much stronger links between public transport planning and the One Plan (and Spatial Plans, District Plans and subdivision consents)</li> </ul>	<p>2, 7, 8, 13, 18, 19</p> <p>FS3</p>
Climate change adaptation	<ul style="list-style-type: none"> <li>• UFD-03(1) and UFD-P1 To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier</li> </ul>	<p>2, 4, 5, 11, 14, 16, 17, 19</p>

Theme	Key matters/topics raised	Submission number(s)
	<p>natural environments and design resilient forms and functions by improving and enhancing them.</p> <ul style="list-style-type: none"> <li>• In times of drought, earthquake or climate change emergencies, consideration is given to emergency water supplies. Amend UFD-P8 to include reference to emergency water supplies.</li> <li>• Request more regional direction on how to ensure urban development is resilient to the effects of climate change.</li> <li>• Revise UFD-O5 to create a clearer policy cascade, so that plan users can be clear whether the outcome intended is to reduce greenhouse gas emissions, or whether development should be managed in a way that reduces the relative potential for generating greenhouse gas emissions.</li> <li>• UFD-O5: needs further expansion to make the objective clearer and more directive.</li> <li>• UFD-P8 – needs to refer to a definition for “best practice resilience.</li> </ul>	

*Table 4: Summary of matters raised in submissions*

**J. ANALYSIS OF SUBMISSIONS**

**Structure**

69. Clause 49(4)(c) of Schedule 1, Part 4 of the RMA allows the Hearing Panel to address submissions by grouping them (for the purpose of providing reasons for accepting or rejecting submission). Grouping may occur either by the provisions to which the submission relates, or the matters to which they relate. On this basis, I have undertaken my analysis and evaluation using primarily a provisions based approach, grouping by topic, rather than a submission-by-submission approach.
70. This report should be read in conjunction with the submissions and summary of those submissions.
71. My recommendations relating to each topic are summarised under the relevant topic heading, considering the relief sought by submitters and the relevance of submission

points in the statutory context of PC3. A table summary of submission points relevant to each topic has been included at the end of each topic sub-section.

72. Many of the submissions received included submission points not requiring specific analysis. These submission points, which in many cases are not relevant to any of the topics, are not specifically discussed in the body of this report. Appendix 2 sets out my recommendations on each submission point based on the analysis contained within the body of this report.
73. Where I have recommended amendments to provisions as a result of relief sought by submitters, I provide a further evaluation in accordance with s 32AA of the RMA. This is included in Section K of this report.
74. I have provided a marked-up version of the provisions with my recommended amendments in response to submissions in Appendix 1.
75. When considering my responses, technical evidence may be required. In particular a brief on strategic matters regarding the Regional Council's role in spatial planning or the NPS-HPL and NPS-FM.

#### **Format for consideration of submissions**

76. For each topic discussed in this report, I have followed a similar general format for considering submissions. This format is as follows:
  - (a) Matters raised by submitters;
  - (b) Analysis; and
  - (c) Recommendations.

#### **Topic 1: Infrastructure**

77. A number of submitters considered that PC3 needs to better recognise nationally significant infrastructure and the potential reverse sensitivity effects from urban development on such infrastructure. This topic was discussed at a pre-hearing meeting where a range of agreements were reached.

### Matters raised by submitters

78. **Nationally significant infrastructure:** Transpower New Zealand (submission 1) noted that the One Plan does not currently give full effect to the NPS-Electricity Transmission (**NPS-ET**). Transpower's particular interest is to ensure PC3 gives effect to the NPS-ET, and that urban intensification enabled by PC3 does not compromise Transpower corridor assets. Transpower's submission seeks multiple changes to PC3 provisions to ensure consistency of wording to give effect to the NPS-ET and include the NPS-ET definition of nationally significant infrastructure in PC3.
79. **Reverse sensitivity:** Transpower (submission 1), KiwiRail (submission 4), Waka Kotahi (submission 2) and NZ Defence Force (submitter 15 and FS1) all raise points regarding the potential for urban development to create reverse sensitivity effects on infrastructure that is nationally significant or of regional or national importance. In the view of these submitters, the PC3 provisions do not recognise or protect nationally significant infrastructure from reverse sensitivity effects associated with urban development. These submitters sought amendments to the scope and background, UFD-I1, UFD-I3, IFD-O3, and UFD-P4 to protect infrastructure from reverse sensitivity effects.
80. NZ Defence Force request the amendments to ensure reverse sensitivity effects on regionally and nationally important infrastructure be avoided. In their further submission to the Transpower submission, NZ Defence Force partially supported some submission points on the proviso that they also referenced nationally and regionally important infrastructure (in addition to nationally significant infrastructure). The distinction being between the uses of the word 'significant' (NPS-UD) and 'important' (Chapter 3, RPS). In other instances NZ Defence Force opposed the submission points on the basis that reference to nationally and regionally important infrastructure had not been included. NZ Defence Force's key point being that regionally and nationally important infrastructure (outlined in Policy 3-1 of the One Plan) should also be protected through the PC3 provisions.
81. Fonterra's further submission points on KiwiRail's submission supported the relief sought to include protection from reverse sensitivity effects on nationally significant infrastructure.

82. Kāinga Ora submitted in opposition to the reverse sensitivity points of KiwiRail's submission, on the basis that effects from the operation of transport corridors should first be mitigated at the source. Kāinga Ora considers including policies requiring decision makers to consider 'conflicting land uses' and potential for reverse sensitivity effects to be ambiguous, overly directive, and to place undue responsibility on the receiving environment to mitigate adverse effects.
83. Waka Kotahi generally supported the notified provisions relating to integration of land use and infrastructure planning.
84. **Future vs planned infrastructure:** Horowhenua District Council (submission 7) seeks to ensure PC3 does not foreclose future development options due to the absence of existing public transport. In relation to out of sequence development, Horowhenua District Council also requested consideration be given to allowing development provided the development infrastructure required has been planned.

Analysis

85. **Inclusion of the NPS-ET definition of nationally significant infrastructure:** The NPS-ET definition of Nationally Significant Infrastructure states:

Nationally Significant Infrastructure means all of the following:

- (a) State highways
- (b) The national grid electricity transmission network
- (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

86. The One Plan does not include a definition for nationally significant infrastructure; however it does list a range of regionally and nationally important infrastructure in Policy 3-1. In analysing whether a definition for nationally significant infrastructure should be included as part of PC3 and subsequent amendments to provisions to recognise nationally significant infrastructure, I have considered whether there is potential conflict or misalignment between the NPS-ET definition and Policy 3-1. My views are set out below:

- Policy 3-1 is not amended by PC3, and so it will continue to function as it does currently – that is, it will continue to apply to the infrastructure of regional or national importance listed in that Policy. However, when managing urban development in areas with nationally significant infrastructure (as defined in the NPS-UD), the PC3 provisions will apply. Other activities that are not urban development (for example, construction in a rural area of a farm building) would be subject to Policy 3-1 but not UFD-O3 and its supporting policies.
- The NPS-UD definition for nationally significant infrastructure is broader than the list of infrastructure considered nationally and regionally important under Policy 3-1 of the One Plan. When it comes to nationally significant infrastructure, the NPS-UD definition is more complete. For example, the NPS-UD definition lists the national grid electricity transmission network as nationally significant, whereas Policy 3-1 is more specific and applies to components of the grid over 6.6kV. Another example is the state highway network, which is identified as nationally significant through the NPS-UD but isn't referenced in Policy 3-1 – instead, Policy 3-1 relies on road and rail

networks as mapped in the Regional Land Transport Strategy, which no longer exists<sup>4</sup>.

- Urban development that impacts NZDF facilities (which is recognised by Policy 3-1 as nationally and regionally important), will still be subject to the direction of Policies 3-2 and 3-3, meaning effects on these activities from urban development will be subject to these policies (specifically Policy 3-2).
- There are no impacts or conflict with the landscapes provisions in Chapter 6 given the provisions relate specifically to urban development and are addressed by UFD-P4(e).
- Objective UFD-O3 is a new provision. Adding effects on nationally significant infrastructure into this objective will not compromise any existing objectives in Chapter 3 which are being retained.
- There is no definition within the One Plan glossary for Nationally Significant Infrastructure, or infrastructure of regional or national importance (policy 3-1 defines regionally and nationally important infrastructure).

87. In my opinion, inclusion of the NPS-UD definition for Nationally Significant Infrastructure and associated recognition of this infrastructure will not directly conflict or generate inconsistency with Policy 3-1 of the One Plan.

88. Regarding the requests made by NZDF to include reference to nationally and regionally important infrastructure to ensure an adequate link back to Policy 3-1 and 3-2 of the One Plan, I do not consider this necessary or appropriate. Protection of regionally and nationally important infrastructure is addressed through existing One Plan Policy 3-2 (with regionally and nationally important infrastructure listed in Policy 3-1). NZDF facilities are identified as regionally important under Policy 3-1, and Policies 3-1 and 3-2 are not proposed to change through PC3. The definitions provided by Policy 3-1 still stand. Urban development and growth will also be subject to these policies.

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<sup>4</sup> Regional Land Transport Strategies were replaced in 2015 by Regional Land Transport Plans which do not map road or rail networks.



89. The definition of Nationally Significant Infrastructure is a NPS-UD definition that applies regardless, and is separate to the One Plan's list of nationally and regionally important infrastructure in Policy 3-1. I therefore do not consider it necessary to include a cross-reference back to Policy 3-1, particularly where no other similar cross-references to other provisions in the One Plan are provided. The One Plan is already designed to be read and applied as an integrated document and cross referencing where it is unnecessary can do more harm than good. My preference is to avoid cross-referencing unless it is absolutely necessary to create a linkage.
90. The one exception to this is UFD-O3. With the replacement of existing RPS Objective 3-3 by UFD-O3 as part of PC3, I consider it appropriate that UFD-O3 refer to infrastructure of regional and national importance, which is then addressed by Policy 3-1 & 3-2 of the One Plan.
91. **Reverse sensitivity:** Reverse sensitivity was discussed at the pre-hearing meeting (Topic 1 infrastructure). Policies 10 and 11 of the NPS-ET direct decision makers to manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that the operation, maintenance, upgrading, and development of the electricity transmission network are not compromised. Policy 11 of the NPS-ET seeks to identify buffer corridors in relation to electricity transmission assets. The NPS-UD definition of nationally significant infrastructure incorporates state highway and rail corridors and so the above points in paragraph 79 in relation to the electricity transmission network are also valid. The One Plan goes some way to addressing reverse sensitivity in Policy 3-2, however this is limited to areas identified as regionally or nationally important under Policy 3-1. In the absence of the existing One Plan policies and definitions providing for reverse sensitivity on nationally significant infrastructure, I recommend amendments to UFD-I1, UFD-I2, UFD-O3 and UFD-P4.
92. Regarding Kāinga Ora's further submission points on reverse sensitivity, the One Plan already includes provisions to minimise the potential for reverse sensitivity effects, through Issue 3-1 and Policy 3-2. The NPS-UD and proposed provisions in PC3 do not change the directive to avoid reverse sensitivity effects while ensuring alignment with the NPS-UD. I therefore do not recommend changes in relation to Kāinga Ora's further submission points.

93. **Future vs planned infrastructure:** I accept the points raised by HDC regarding public transport. Provision of public transport is the responsibility of the regional council. Public transport planning and implementation is guided by the Regional Public Transport Plan and is subject to a separate planning and funding process. The key requirement is that any urban development should ensure public transport is able to be<sup>5</sup> implemented as part of any intensification or expansion of the urban environment. This issue is also traversed in the public and active transport topic (Topic 4). I have recommended changes to this effect.
94. For out of sequence developments, however, the threshold is set higher. Sub-part 2 of the NPS-UD provides direction on responsive planning and to meet the criteria of adding significantly to development capacity it is important that development infrastructure in either already available or imminent (without affecting the ability to provide for other planned development infrastructure). By amending UFD-P6(e) to include ‘planned upgrades’, I am satisfied that the criteria for out of sequence developments to add significantly to development will be met. I have recommended changes to this effect.

#### Recommendations

95. I recommend the NPS-ET definition for ‘Nationally Significant Infrastructure’ be included in PC 3.
96. I recommend UFD-I1, UFD-I2, UFD-O3 and UFD-P4 include provision for nationally significant infrastructure to not be compromised by reverse sensitivity effects.
97. I recommend UFD-O3 also include reference to ‘Regionally and Nationally Important’ infrastructure and provide for public transport to be enabled.
98. I recommend UFD-P1(2) and UFD-P4 be updated to enable intensification and expansion of urban environments where public transport has been enabled and can be delivered by the regional council.
99. I recommend UFD-P6(e) be updated to provide for ‘planned upgrades’ to development infrastructure for out of sequence developments.

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<sup>5</sup> Underlined for emphasis

Summary of submission points relevant to Topic 1: Infrastructure

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-I1 Submission point 4.1	Supports the description of this issue, but considers an amendment is required to recognise urban development and land use changes can result in reverse sensitivity effects, and that the interfaces between conflicting land uses must be appropriately managed.	Amend to: <i>Poorly planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, development infrastructure* and additional infrastructure. It can also have <u>the potential to create land use conflicts and reverse sensitivity effects</u>. This does not contribute to...</i>	FS1.5 FS2.1 FS3.3	<b>Accept in part</b> It was agreed in pre-hearing meeting that reverse sensitivity effects from poorly planned urban development should be recognised as part of this issue. The inclusion of ‘land use conflicts’ as proposed is not considered necessary as this is adequately addressed by inclusion of ‘reverse sensitivity’. Amend UFD-I1 as follows: Poorly planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, <i>development infrastructure*</i> and <i>additional infrastructure*</i> . <u>It can also have the potential to create reverse sensitivity effects</u> . This does not contribute to a <i>well-functioning urban environment*</i> , can create adverse environmental <i>effects*</i> and will make it more difficult for urban development to meet the needs of current and future communities.
UFD-I3 Submission point 4.2	Considers express recognition of reverse sensitivity effects is necessary to ensure development near transport	Amend to: <i>A growing population increases demand for housing, business land, Infrastructure</i>	FS1.6 FS2.2	<b>Accept in part</b> with amendments. I do not support removal of the ‘ <i>planning and funding decisions</i> ’ wording in this issue.

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	corridors can co-exist in an appropriate way.	<i>and community services. Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure <del>planning and funding decisions</del>, manages effects on the urban and natural environment, <u>avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors</u>, and improves resilience to the effects of climate change</i>	FS3.4	As agreed at pre-hearing meeting 1 and to align with changes made to include the NPS-UD definition for Nationally Significant Infrastructure (submission point 1.5) Amendments to UFD-I3 are recommended as follows:  “ <i>infrastructure^ and community services*</i> . Growth needs to be provided for in a way that contributes to <i>well-functioning urban environments*</i> , is integrated with <i>infrastructure^</i> planning and funding decisions, <u>avoids the creation of reverse sensitivity effects on existing infrastructure of national significance</u> , manages <i>effects*</i> on the urban and natural environment, and improves resilience to the <i>effects*</i> of <i>climate change^</i> .”
UFD-I3 Submission point 15.1	Development must be appropriately located and designed in relation to established infrastructure, and needs to be managed in a way that avoids effects on regionally or nationally significant infrastructure. The existing provisions of the RPS appropriately provide for this approach. However, there is no connection between these existing RPS provisions and PC3.	Amend to include:  A growing population increases demand for housing, business land*, infrastructure^ and community services*. Growth needs to be provided for in a way that contributes to well-functioning urban environments*, is integrated with infrastructure^ planning and funding decisions, manages effects* on the urban and natural environment <u>and on</u>		<b>Reject</b>  The existing wording in the scope and background section of Chapter 3 (under the heading ‘infrastructure and other physical resources of regional or national importance’) provides for reverse sensitivity effects on infrastructure of regional or national importance. This part of Chapter 3 is not proposed to change as part of PC3.

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
		infrastructure and physical resources of regional or national importance, and improves resilience to the effects* of climate change^.		I am therefore satisfied that management of reverse sensitivity on regionally and nationally important infrastructure is already provided for through the One Plan
UFD-O1	Both planning and delivery need to be carefully managed to ensure that any effects at the interface of conflicting land uses, including reverse sensitivity effects, are appropriately managed	Add clause: <i>(5) land use conflicts are minimised as far as practicable, including avoiding the potential for reverse sensitivity effects</i>		<b>Reject</b> Inclusion of this clause or reference to reverse sensitivity in UFD-O1 was not raised at the pre-hearing meeting on infrastructure. In considering this request, I do not believe an additional clause is required in UFD-O1. Protection of nationally significant infrastructure, and regionally and nationally important infrastructure from reverse sensitivity is addressed through UFD-O3.
UFD-O3 Submission point 1.1	In order to give effect to NPS-ET policies 10 and 11, an amendment is sought to the objective to specifically reference effects on nationally significant infrastructure (as defined in the NPS-UD 2020).	Amend to include: <i>(f) manages the effects on nationally significant infrastructure</i>	FS1.1	<b>Accept in part</b> I recommend reference to infrastructure of regional and national importance be included in clause (f) to link back to Policies 3-1 and 3-2 of the One Plan as requested in FS1.1 by NZDF. I recommend rewording UFD-O3 as follows: The intensification and expansion of urban environments*: (1) contributes to well-functioning urban environments* that

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<ul style="list-style-type: none"> <li>(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,</li> <li>(b) increase housing capacity and housing choice,</li> <li>(c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,</li> <li>(d) are well connected by a choice of transport modes including public transport*,</li> <li>(e) manage adverse environmental effects*, <u>and</u></li> <li>(f) <u>manage reverse sensitivity effects on the operation, maintenance and upgrade of nationally significant infrastructure or infrastructure of regional or national importance.</u></li> </ul>
UFD-O3 Submission point 15.2	Development must be appropriately located and designed in relation to established infrastructure, and needs to be managed in a way that avoids	Amend to include: The intensification and expansion of urban environments*:		<b>Accept</b> With the replacement of existing Objective 3-3 as part of PC3 (through UFD-O3), I consider appropriate that UFD-O3 refer to infrastructure of

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	effects on regionally or nationally significant infrastructure. The existing provisions of the RPS appropriately provide for this approach. However, there is no connection between these existing RPS provisions and PC3.	(1) contributes to well-functioning urban environments* that <u>(e) protects infrastructure and physical resources of regional or national importance and provides for its ongoing operation, and</u>		regional and national importance which is then addressed by Policy 3-1 & 3-2 of the One Plan (noting that Policy 3-1 and 3-2 are not proposed to change as part of PC3).  Without this change, the original intent and policy cascade associated with nationally and regionally important infrastructure will not be provided for.
UFD-P1 Submission point 4.6	considers express recognition of reverse sensitivity effects is necessary to ensure development near transport corridors can co-exist in an appropriate way.	Add clause: <i>3) ensure development avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors</i>	FS1.8 FS2.4 FS3.6	<b>Reject</b>  Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4
UFD-P2 Submission point 4.7	considers that express recognition is needed for the consideration of reverse sensitivity effects which must be carefully managed when providing for out-of-sequence urban growth.	Add clause: <i>(4) The development avoids the potential for reverse sensitivity effects on the safe and efficient operation of infrastructure, including transport corridors</i>	FS 1.9 FS2.5 FS3.7	<b>Reject</b>  UFD-P2 is associated with providing sufficient development capacity and land to accommodate demand and is in accordance with Policy 2 of the NPS-UD. It would be out of step with the policy intent to include reference to reverse sensitivity in this policy. Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4.

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-P4 Submission point 15.3	Development must be appropriately located and designed in relation to established infrastructure, and needs to be managed in a way that avoids effects on regionally or nationally significant infrastructure. The existing provisions of the RPS appropriately provide for this approach. However, there is no connection between these existing RPS provisions and PC3.	Amend to include:  (2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it:  (d) manages adverse reverse sensitivity effects* on land with existing incompatible activities adjacent to the urban environment* boundary, <u>and avoids adverse effects, including reverse sensitivity effects, on infrastructure and resources of regional or national importance.</u>		<b>Reject</b>  Through pre-hearings it was agreed that the NPS-UD definition for nationally significant infrastructure would be included as part of PC3. This definition aligns with the NPS-ET and NPS-UD; however it does not extend to NZDF facilities. Existing One Plan Policy 3-1 defines infrastructure and facilities and assets (which includes NZDF facilities) of regional and national <u>importance</u> <sup>6</sup> . Policy 3-2 provides direction for managing activities that may affect this infrastructure or these facilities. Policies 3-1 and 3-2 remain in effect and must still be considered as part of any development. I am therefore satisfied that UFD-P4 does not need to include reference to infrastructure of regional or national importance.
UFD-P4(e) Submission point 4.8	Some unanticipated plan changes may not be adjacent to urban environment boundaries. KiwiRail considers that express recognition is needed for the consideration of reverse sensitivity	Amend to:  (e) it protects, <u>where practicable</u> , natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.		<b>Reject</b>  I consider that adding the words ‘where practicable’ will weaken the intent of this policy. Through pre-hearing meetings KiwiRail confirmed they would not be pursuing this submission point.

<sup>6</sup> Underlined for emphasis



Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	effects both near the urban boundary and elsewhere.			
UFD-P4(d) Submission point 4.9	As above for UFD-P4(e)	Amend to d) manages adverse reverse sensitivity effects on land with existing incompatible activities <del>or adjacent to the urban environment* boundary</del>		<p><b>Accept in part</b></p> <p>I agree that reverse sensitivity should be addressed where it occurs, however complete removal of this part of the policy would weaken it.</p> <p>Amend UFD-P4 as per agreement reached in pre-hearing meeting 1 to:</p> <p>....</p> <p>(2) In addition to meeting the criteria in (1) above, the expansion of <i>urban environments*</i> must only occur where it:</p> <ul style="list-style-type: none"> <li>(a) is adjacent to existing or planned urban areas,</li> <li>(b) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,</li> <li>(c) is well-connected along transport corridors,</li> <li>(d) manages adverse reverse sensitivity <i>effects*</i> on land with existing incompatible</li> </ul>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				activities, <u>including</u> adjacent to the <i>urban environment</i> * boundary
UFD-P4 Submission point 1.2	supports the intent of the policy but seeks amendment to provide consideration of the effects of intensification and expansion on the National Grid	Amend UFD-P4(1) to include: <i>(f) the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised</i>	FS1.2	<b>Accept</b> I recommend the wording of UFD-P4 amended as requested and agreed through pre-hearing
UFD-P4(2) Submission point 1.3		Amend UFD-P4(2) to include: <i>(e) ensures the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised.</i>	FS1.2	<b>Accept</b> Wording added as requested with a slight change to order for better reading as follows: (2) in addition to meeting the criteria in (1) above, the expansion of <i>urban environments</i> * must on occur where it: <u>e) does not compromise the operation, maintenance and upgrade of nationally significant infrastructure*.</u>
UFD-P6(f) Submission point 1.4	While Transpower supports the effects on infrastructure as a criterion, it has concerns the reference in the criterion to “as far as reasonably practicable” does not give effect to the NPS-ET and is not sufficiently directive to ensure the operation, maintenance and upgrade of the National Grid is not	Amend UFD-P6(1)(f) as follows: <i>(f) the development avoids adverse effects* on infrastructure^, and other physical resources of regional or national importance as far as reasonably practicable.</i> <b>Or</b>	FS1.3	<b>Accept</b> I recommend UFD-P6(f) be amended as requested and agreed through pre-hearing. Removal of the wording ‘as far as reasonably practicable’ ensures alignment with the NPS-ET.

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	compromised and adverse effects will not result.	<i>(f) the development avoids adverse effects* on infrastructure^ and other physical resources of regional or national importance as far as reasonably practicable.</i>		<p>(1) Unanticipated or out of sequence development will add significantly to <i>development capacity*</i> where:</p> <p>(a) the location, design and layout of the development will contribute to a <i>well-functioning urban environment*</i>,</p> <p>(b) the development is well-connected along transport corridors, and to <i>community services*</i>, and open space,</p> <p>(c) the development will significantly contribute to meeting demand for additional urban land identified in a <i>Housing and Business Development Capacity Assessment*</i>, or a shortfall identified by undertaking the monitoring requirements outlined in the National Policy Statement on Urban Development 2020, including meeting <i>housing bottom lines*</i>, or specific housing and price needs in the market,</p> <p>(d) the development will be realised in the <i>short term*</i> and before anticipated planned urban development,</p> <p>(e) there is adequate existing or upgraded <i>development infrastructure*</i> to support</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>development of the <i>land</i>* without adverse <i>effects</i>* on the provision or capacity of other planned <i>development infrastructure</i>* including planned <i>infrastructure</i>* expenditure, and</p> <p>(f) the development avoids adverse <i>effects</i>* on <i>infrastructure</i><sup>^</sup> and other physical resources of regional or national importance <del>as far as reasonably practicable</del>.</p>
UFD-P6(e) Submission point 7.10	It would be clearer to reword UFD-P6(e) to “adequate existing development infrastructure, or sufficient upgrades are able to be made to existing development infrastructure	Reword <b>UFD-P6(e)</b> as requested		<p><b>Accept in part with amendments</b></p> <p>I agree that the policy should not require all necessary infrastructure to be installed, but to also be programmed or sequenced in some strategic planning document. However, the criteria of UFD-P6 seeks to place more stringency on out of sequence developments to ensure they do not adversely affect other planned development. I have therefore recommended amending wording of UFD-P6(e) to:</p> <p>...</p> <p>There is adequate existing, or <del>upgraded</del> <u>planned upgrades</u> to development infrastructure, to</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				support development of the land without adverse effects on the provision or capacity of other planned development infrastructure expenditure, and...
Definitions Submission point 1.5	In order to support the sought amendments to UFD-O3 and UFD-P4 Transpower seeks the inclusion of a definition of “nationally significant infrastructure” as provided in the NPS-UD.	Include the NPS-UD definition of “nationally significant infrastructure”.	FS1.4	<b>Accept</b> I recommend the NPSUD definition for nationally significant infrastructure be added as- requested, for the reasons outline in paragraphs 85-87 above.

Table 5: Analysis of submissions and officer recommendations

## Topic 2: Territorial Authority matters

100. Submissions from Territorial Authorities (**TAs**) and other organisations raised various points relating to matters that impact TAs and their functions. The majority of the changes sought under this theme revolve around improving certainty for TAs and ensuring consistency with the NPS-UD.

### Matters raised

101. **Inclusion of development capacity as a ‘Big four’ issue:** Horowhenua District Council (submission 7) sought changes for the One Plan to recognise the importance of enabling development capacity and acknowledge the national significance now given to the matter by the NPS-UD. The submission seeks to include development capacity as part of the ‘Big four’ issues identified in the One Plan. This change would then give urban development capacity an equivalent priority as the fifth ‘big’ regional issue.
102. **Guidance for smaller settlements:** Horowhenua District Council (submission 7), Manawatū District Council (submission 10) and Rangitikei District Council (submission 12) raised matters seeking more guidance on how PC3 applies to smaller settlements that do not meet the definition of Tier 1, 2 or 3 urban environments as well as those which may become an urban environment over time.
103. **Housing bottom lines for Tier 3 urban environments:** Kāinga Ora (submission 17) and National Public Health: MidCentral, Te Whatu Ora Health New Zealand (submission 19) seek that Tier 3 local authorities be included in the housing bottom lines table under UFD-P2. Kāinga Ora seeks that Levin in particular be included in UFD-P2 given the projected growth (to support the Wellington Regional Growth Framework) is more akin to a Tier 1 or 2 Council.
104. **UFD-O3(1)(c) and UFD-P4(1)(b):** Palmerston North City Council (submission 11) requested removal of the wording “Relates well to its surrounding environment” which features in both UFD-O3(1)(c) and UFD-P4(1)(b) on the basis that needing to provide for development outcomes that relate well to the existing built environment has the potential to affect opportunities for different development outcomes. The submitter

considers this is contrary to what the NPS-UD is seeking to enable. This submission point was supported by Kāinga Ora's further submission.

105. **Inclusion of business land (alongside land for housing):** Fonterra (submission 14) requests amendments to UFD-O3 and UFD-P4(1) to include business land alongside land for housing as providing both are important.
106. **Acknowledgement of Horizons role in UFD-P1:** Palmerston North City Council (submission 11) highlighted a concern that constraints for planned urban expansion and the need to recognise Horizons' role in providing infrastructure necessary for growth (e.g. flood management, public transport). In essence, the submission seeks for UFD-P1 to be amended to recognise the role of Horizons Regional Council in ensuring flood protection infrastructure enables urban development. Palmerston North City Council's submission also considers that the criticality of infrastructure in enabling urban growth (intensification or greenfield development) is not given sufficient emphasis in PC3.
107. Horowhenua District Council (submission 7) raised a similar point and considers the One Plan needs to confront more directly the challenges faced in consenting the new and extended infrastructure that is needed to support future urban development capacity. The submission seeks for the One Plan to also recognise that Horizons has an important role in providing necessary infrastructure (e.g. public transport) and in either facilitating or frustrating the consenting of infrastructure (e.g. through water take and discharge consents).
108. **Policy distinction for expansion and intensification:** Horowhenua District Council (submission 7), Manawatū District Council (submission 10) and Rangitīkei District Council (submission 12) question the approach of PC3 to urban expansion (greenfield) and intensification as addressed through UFD-P4. These submitters seek separate policy direction, particularly in UFD-P4 for expansion and intensification on the basis that these represent different types of urban development. Horowhenua District Council's submission also suggests more direction be provided in this policy to encourage more efficient utilisation of residential land, such as density targets or other methods, and to encourage water sensitive design.
109. **Enabling papakāinga development:** Kāinga Ora, Horowhenua District Council, Rangitīkei District Council, Manawatū District Council, and Marilyn & Bruce Bulloch

(Submission numbers 17, 7, 12, 10, and 9 respectively) all raise matters regarding provision of papakāinga housing in urban environments. These submissions all sought to enable papakāinga on general title land, not just Māori owned land as specified in UFD-P7(2)(b). The Bulloch submission stated their view that this should not be at the expense of good planning in urban areas.

110. Kāinga Ora did not submit on UFD-P7, however did seek amendments to UFD-P5 to explicitly enable papakāinga in urban settings on general title land.
111. **Replication of NPS-UD objectives and policies with variations in language:** Horowhenua District Council (submission 7), Manawatū District Council (submission 10) and Rangitīkei District Council (submission 12) are of the view that PC3 repeats the provisions of the NPS-UD, rather than seeking to provide a more tailored, regional direction. The submissions state that more regional direction in the plan change would be more efficient and effective means of achieving the purpose of the RMA. It is also noted that the wording of PC3 departs slightly from NPS-UD in some places. This has the potential to cause confusion and may be seen to indicate that Horizons have different priorities when it comes to urban development.
112. The Horowhenua, Manawatū and Rangitīkei District Council submissions all request that the PC3 provision wording reflect the exact wording and word order of the NPS-UD unless there is a specific regional issue that is intended to be addressed.
113. The Horowhenua, Manawatū and Rangitīkei District Council submissions also seek definitions from the NPS-UD and replicated in PC3 to be limited to “as per the National Policy Statement – Urban Development 2020 or any subsequent amendment” or similar.
114. **Uncertainty around roles and responsibilities:** Horowhenua District Council (submission 7), Manawatū District Council (submission 10) and Rangitīkei District Council (submission 12) raise concerns that some provisions within PC3 appear to blur the lines between regional and district authority functions, creating uncertainty relative to the roles and responsibilities under the RMA. A number of the provisions where this was identified have been addressed through recommended changes to the Objectives and policies of PC3 in response to pre-hearing meeting agreements. However UFD-P5 still requires consideration. In their submission, Manawatū District Council identifies



concerns regarding UFD-P5 (Built Form) and its role in the regional plan, given it addresses matters such as the form and function of urban development and subdivision which would be set by the respective district plans. Manawatū District Council requests UFD-P5 either be deleted or its intent clarified through amendments.

#### Analysis

115. **Inclusion of development capacity as a ‘Big four’ issue:** In my view inclusion of urban development capacity as part of the One Plan ‘Big four’ is out of scope. PC3 did not notify changes to the ‘Big four’, which are contained in Chapter 1 of the One Plan, and no analysis has been undertaken via the s 32 process to test such changes. I do not recommend including urban development capacity in the keystone issues identified within Chapter 1.
116. **Guidance for smaller settlements:** In general, the scope of PC3 has been limited to urban environments in order to align with the NPS-UD. Appendix D of the s 32 report states *“The PPC is directed towards the NPS-UD’s focus on ‘urban environments’ (and the definition includes “is, or is intended to be, part of a housing and labour market of at least 10,000 people”). However, some objectives apply more broadly to urban development generally, including with regard to strategic planning and integration of infrastructure – UFD-O1, and UFD-P1, for example”*. UFD-O1 incorporates the principles of existing One Plan RPS Objective 3-3 which will be replaced by UFD-O1. The objective therefore applies to all settlements in the region, regardless of size. However, there is an opportunity to make this clearer in the scope and background section and I have recommended amended wording to this effect.
117. In response to Horowhenua District Council’s request for guidance on what happens to smaller settlements that may grow and become a Tier 2 or 3 urban environment in the future, I also believe this can be addressed by additional wording in the scope and background section of PC3. In effect, any small settlements that grow to a level where they meet the definition of an urban environment would be subject to the provisions of PC3 for urban environments.
118. **Housing bottom lines for Tier 3 urban environments:** The government determined which cities in New Zealand were required to establish and achieve housing bottom lines (through the NPS-UD). To include Tier 3 urban environments would, in my opinion,

require expanding the scope of PC3 and no evidence has been compiled to justify a more stringent approach than the NPS-UD. However, I note that clause 1.5 of the NPS-UD strongly encourages Tier 3 local authorities “to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3 of this National Policy Statement...”. It is therefore a possibility that some Tier 3 authorities may end up establishing housing bottom lines, but this would be at their discretion.

119. In response to Kāinga Ora’s request regarding Levin, there may be a case for including Levin in UFD-P2, on the basis that Horowhenua is part of the Wellington-Wairarapa-Horowhenua Future Development Strategy and has developed a Housing and Business Capacity Assessment as part of this process. In that vein, the Horowhenua District, in particular Levin is operating more akin to a Tier 2 urban environment. Discussions with Horowhenua District Council officers about this indicated they would consider whether housing bottom lines for Levin should be included in UFD-P2. At the time of preparing this evidence, a decision had not been made, and in the absence of agreement and provision of figures my recommendation is to not include Levin in UFD-P2 at this time. Should further evidence from Horowhenua District Council come to light, I would be prepared to revise my position on this submission point.
120. **UFD-O3(1)(c) and UFD-P4(1)(b):** I agree with the rationale provided by Palmerston North City Council. It was not the intention of PC3 to limit development based on nature of the surrounding environment, and to do so would contradict the NPS-UD. I recommend changes based on the requested relief by Palmerston North City Council.
121. **Inclusion of business land (alongside land for housing):** The request to include provision of business land alongside housing land as part of urban expansion and intensification was discussed at pre-hearing 2 (TA matters). It was agreed by parties present that the amendments sought by Fonterra would be included. I agree with the changes sought as provision of capacity and choice for business land is also a directive of the NPS-UD.
122. **Acknowledgement of Horizons role in UFD-P1:** While I acknowledge the intent behind what Palmerston North City Council and Horowhenua District Council are seeking, I believe PC3 does go far enough. UFD-P1 relates to development infrastructure, and I note the NPS-UD development infrastructure definition does not include flood

protection infrastructure. I am of the view that amending UFD-P1 to try and include regional council responsibility would create an added layer of complexity and may not be appropriate given it would go beyond the NPS-UD definition for development infrastructure. Furthermore, Method 2 provides more detail on strategic planning and the various roles of regional council and territorial authorities in this. In my view consideration of existing and planned flood protection would occur as part of Future Development Strategies and Housing and Business Capacity Assessments for Tier 2 authorities, which Horizons is jointly responsible for preparing. Should any Tier 3 authority embark on developing a Future Development Strategy or Housing and Business Assessment, Horizons Regional Council would also be jointly responsible as per the requirements of the NPS-UD.

123. I do however consider that Method 2 could partially address the matter raised regarding regional council infrastructure (e.g. flood protection). I recommend amendments to the wording in Method 2 (strategic planning) to include reference to regional council infrastructure as part of growth strategies as follows:

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 authority infrastructure^ planning

124. **Policy distinction between expansion and intensification:** In my opinion, UFD-P4 already provides this differentiation. UFD-P4(1) relates to both intensification and expansion. UFD-P4(2) provides additional criteria for urban expansion to meet in order for development to occur. I am satisfied that this provides an appropriate level of distinction between the requirements associated with greenfield growth (expansion) and intensification. In addition I consider the approach of PC3 aligns with the NPS-UD, including in relation to achieving ‘well-functioning urban environments’, and the proposed provisions do not prohibit greenfield development but do require it to be evidence based. I do not recommend changes to UFD-P4 to address the submission points on this topic.

125. **Enabling papakāinga development:** I support the submissions requesting UFD-P7(2)(b) enable papakāinga development on general title land as well as Māori owned land. I have recommended changes to this effect.
126. I do not support Kāinga Ora’s requested relief to include additional wording in UFD-O5 to explicitly provide for papakāinga housing. In my opinion PC3 adequately enables papakāinga development in urban environments through UFD-P5 and UFD-P7. UFD-P5(2) states a ‘range of housing types and densities, under which papakāinga can be enabled. UFD-P7 focuses on enabling iwi and hapū involvement in urban development to ensure Māori are able to express their cultural traditions and norms. It also requires land use strategies to enable papakāinga housing and marae.
127. **Replication of NPS-UD objectives and policies with variations in language:** Through development of the provisions, alignment with the NPS-UD was considered and evaluated as part of the s 32 report (section 9). The s 32 report considers relying on the wording in the NPS-UD (as per the submitter’s request) and concluded that the proposed provisions are “anticipated to be more effective and efficient than the alternatives”. With that said, I have canvassed the provisions against the NPS-UD terminology to identify any particular inconsistencies that would create confusion or uncertainty. At the direction of the pre-hearing facilitator, the territorial authority officers present also reviewed the provisions and provided a tracked change version to identify the areas they consider there to be inconsistencies with the NPS-UD. Based on this, I recommend changes to UFD-O3(2), UFD-O4 UFD-P4(3), and UFD-P6 as follows:
- (a) UFD-O3(2) includes the word ‘or’ at the end of each clause. Objective 3 of the NPS-UD does not include the word ‘or’. To maintain consistency, I recommend removing ‘or’ from clauses (a) and (b) of UFD-O3(2).
  - (b) UFD-O4 largely aligns with the NPS-UD Objective 5 terminology, however, includes the word ‘regarding’ instead of ‘relating’ and uses the word ‘principles’ in a different location to the NPS-UD Objective 5. To maintain consistency, I recommend adopting the NPS-UD terminology.
  - (c) UFD-P4(3) largely aligns with NPS-UD Policy 5, however uses plainer language (e.g. use of the word “equal to” instead of “commensurate”). To align wholly

with the NPS-UD I recommend UFD-P4(3) be amended to use the same wording as the NPS-UD.

- (d) The heading of UFD-P6 draws from the NPS-UD but possibly doesn't accurately represent the policy's focus, which is planning criteria for unanticipated or out of sequence development that contributes significantly to development. I recommend amending the heading of UFD-P6 to "criteria for unanticipated or out of sequence development".

128. Through their review of the PC3 provisions, the TAs sought changes to UFD-O1 to restrict the application of this provision to urban environments. UFD-O1 replaces existing One Plan Objective 3-3, which seeks adequate and timely supply of land for urban development. Restricting this objective to urban environments reduces the scope of the existing One Plan provisions, which is not the intention of PC3. My understanding based on the s 32 report is that PC3 was to include the NPS-UD requirements for the provision of infrastructure but also preserve the existing One Plan requirements. On that basis, I do not support restricting UFD-O1 to urban environments. In my view the requirements of UFD-O1, even if applied to smaller settlements, are reasonable.

129. Through their review of the PC3 provisions, the TAs identified changes to UFD-P1 to apply these provisions to urban environments. A similar issue arises where UFD-P1 replaces existing One Plan policy 3-4 which seeks to integrate infrastructure with land use. Limiting UFD-P1 to urban environments only weakens the existing One Plan direction under Policy 3-4, which is not the intention of PC3. However, I do accept that UFD-P1 introduces a more stringent requirement in demonstrating how sufficient development capacity will be provided – a requirement of the NPS-UD for urban environments. I do not consider it appropriate to place this requirement on smaller settlements that are not defined as 'urban environments'. I therefore recommend changes to UFD-P1 to add wording to (1) to apply only to urban environments. I believe it is appropriate for clause (2) of UFD-P1 to continue to apply to all environments, as this aligns with the existing One Plan policy direction. My recommended changes are shown in underline as follows:

**UFD-P1**

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

(1) for *urban environments\** 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, ensure there is co-ordination between the location, form and timing of urban growth and the funding, delivery and implementation of *development infrastructure\**.

130. **Uncertainty around roles and responsibilities (UFD-P5):** UFD-P5 responds to Policy 6 of the NPS-UD. In my opinion, there is a role for UFD-P5 in the RPS to guide plan development and decision making for urban environments. Further, other submitters have supported this policy, particularly in relation to its direction around provision of a range of housing types and densities. I am uncertain what regional context is being sought by Manawatū District Council in relation to this submission point. In an attempt to make the policy clearer around roles and responsibilities, I recommend additional wording (shown in underline) to introduce the policy and improve certainty around roles and responsibilities as follows: “Territorial Authorities must ensure the form and design of subdivision, use and development in *urban environments\** is managed so that it...”

#### Recommendations

131. In relation to scope and background, I recommend amendments to provide guidance on how PC3 applies to smaller settlements.
132. Amend UFD-O3(1)(b) and (c) to incorporate changes sought by Fonterra and Palmerston North City Council regarding inclusion of business land and removal of ‘that relates well to its surrounding environment’ as follows:

#### **UFD-O3**

The intensification and expansion of *urban environments\**:

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

...

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

(c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment,~~

**UFD-P4**

(1) Intensification and expansion of *urban environments*\* is provided for and enabled in *district plans*<sup>^</sup> where:

...

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

133. Amend UFD-O3(4) by removing 'or' from clauses (a) and (b)

**UFD-O3(2)**

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

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

(b) it is well-served by existing or planned *public transport*\*, ~~or~~

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

134. Amend UFD-O4 to align with Objective 5 of the NPS-UD as follows:

**UFD-O4**

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

135. Amend UFD-P1 (1) to align with the NPS-UD and apply to urban environments as follows:

**UFD-P1**

*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\* demonstrate how *sufficient development capacity\** for housing and *business land\** will be provided in the *short term\**, *medium term\** and *long term\** in a well-planned and integrated manner, and*
- (2) *ensure there is co-ordination between the location, form and timing of urban growth and the funding, delivery and implementation of *development infrastructure\**.*

136. Amend UFD-P4(3) to align with NPS-UD Policy 5 as follows:

**UFD-P4(3)**

*District plans^ applying to urban environments\* must enable heights and density of urban form which are commensurate with equal to the greater of:*

- (a) *~~demonstrated~~ relative demand for housing and/or business use in that location, or*

137. Amend UFD-P5 to provide additional clarification around roles and responsibilities as follows:

**UFD-P5**

*Territorial Authorities must ensure ~~the~~ form and design of subdivision, use and development in *urban environments\** is managed so that....”*



138. Amend the heading of UFD-P6 to align with NPS-UD clause 3.8 as follows:

**UFD-P6**

~~Significant development capacity\*~~ criteria for evaluating unanticipated or out of sequence development

139. Amend UFD-P7(2)(b) to remove the wording “on Māori owned land”.
140. Amend Method 2 to include reference to Regional Council and Territorial Authority infrastructure planning as part of growth strategy development.

**Summary of submission points relevant to Topic 2: Territorial Authority Matters**

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
General Submission point 7.2	We consider that well-functioning urban environments/sustainable growth should be escalated to be a keystone environmental issue – essentially setting out “The BigFive” instead of “The Big four” in Chapter 1.3 of the One Plan.	That Plan Change 3 reporting includes an assessment of whether Sustainable Urban Growth should be included as a ‘keystone environmental issue’ in Chapter 1.3 of the One Plan		<p><b>Reject</b></p> <p>In my opinion inclusion of urban development capacity as part of the One Plan ‘Big four’ is out of scope. PC3 did not notify changes to the ‘Big four’, contained in Chapter 1 of the One Plan.</p>
General Submission points 7.1, 10.11 & 12.1	We note that the Plan Change does not provide guidance on development of smaller settlements that do not meet the definition of Tier 1, 2 or 3, or on which settlements may be escalated up a level over time as growth increases.	Some guidance on such matters would be useful.	FS3.17	<p><b>Accept in part.</b></p> <p>The scope of PC3 is limited to giving effect to the NPS-UD i.e. development of urban areas. Generally the provisions of PC3 do not apply to settlements under 10,000 people, with the exception of UFD-O1 which incorporates the principles of existing One Plan RPS Objective 3-3 which will be replaced by UFD-O1.</p> <p>I accept that PC3 could provide greater clarity on how smaller settlements are addressed and recommend amendments to the scope and background of PC3, under the heading ‘Urban development and the National Policy Statement on Urban Development 2020’ as follows:</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p><u>“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 <i>urban environments*</i>. “</u></p>
UFD-O3(1)(b) Submission point 14.1	The provision of sufficient development capacity of business land through intensification and expansion is a critical element of a well-functioning urban environment and is consistent with the provisions of the NPS-UD. This is currently absent from UFD-O3. Fonterra's proposed amendments give effect to the NPS-UD.	Amend UFD-O3(1) to read as follows: <i>The intensification and expansion of urban environments:</i> <i>(1) contributes to well-functioning urban environments that:</i> <i>(b) increase <u>the capacity and choice available within housing and business land capacity and housing choice,</u></i>		<b>Accept.</b> I recommend the wording of UFD-O3(1)(b) be amended as requested.
UFD-O3(1) (c)	The NPS-UD assumes that urban environments will change over time. Needing to provide for development outcomes that relate well to the	request that UFD-O3(1)(c) be amended to exclude <b>“that</b>	FS3.16	<b>Accept.</b> I recommend UFD-O3(1)(c) be amended as requested and agreed at pre-hearing

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	existing built environment has the potential to stymie opportunities for different development outcomes that the NPS-UD is seeking to enable	<u>relates well to its surrounding environment</u> .		
UFD-P1 / Method 2 Submission point 11.3	Integration of infrastructure with land use should not be the sole responsibility of local territorial authorities. Horizons is responsible for providing flood protection infrastructure.	That UFD-P1 be amended to recognise that Horizons also has a key role in aligning infrastructure provision with land use planning.		<p><b>Reject</b></p> <p>UFD-P1 relates to development infrastructure, and I note the NPS-UD development infrastructure definition does not include flood protection infrastructure. I am of the view that amending UFD-P1 to try and include regional council responsibility would create an added layer of complexity and may not be appropriate given it would go beyond the NPS-UD definition for development infrastructure. Furthermore, Method 2 provides more detail on strategic planning and the various roles of regional council and territorial authorities in this. In my view consideration of existing and planned flood protection would occur as part of Future development strategies and Housing and Business Assessments for Tier 2 authorities, which Horizons is jointly responsible for preparing.</p> <p>I do however consider that Method 2 could partially address the matter raised regarding regional council infrastructure (e.g. flood protection). <b>I recommend</b> amendments to the wording in Method 2 (strategic planning) to include reference to regional council</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>infrastructure as part of growth strategies as follows:</p> <p>...</p> <p>These strategies will enable decision-making to be based on sufficient information to:</p> <p>(a) coordinate the intensification of <i>urban environments*</i> and the development of extensions to <i>urban environments*</i> with <u>regional council and territorial authority infrastructure</u><sup>^</sup> planning</p>
<p>UFD-P2 Submission points 17.2 and 19.3</p>	<p>housing bottom lines are included for Tier 2 local authorities such as Palmerston North City Council. We support a similar approach for tier 3 local authorities.</p> <p>We seek that Levin is included in the housing bottom line table under UFD-P2. Although Horowhenua District Council is a Tier 3 Council under the NPS-UD, the projected growth in Levin (to support the Wellington Regional Growth Framework) is more akin to a Tier 1 or 2 Council.</p>	<p>With regard to housing bottom lines, a similar approach is suggested for tier 3 local authorities.</p> <p>Change to:</p> <p><i>(3) ensuring the urban intensification and expansion necessary to meet the housing bottom lines* specified in Table X is provided for in the Palmerston North District Plan and the Horowhenua District Plan.</i></p>		<p><b>Reject</b></p> <p>In general I don't support this as it is not required by the NPS-UD and goes beyond the scope of PC3 as outlined in the s 32 evaluation. No evidence has been compiled to justify a more stringent approach than the NPS-UD. However there is a case to be made for Horowhenua (specifically Levin) given they have been included in the Wellington-Wairarapa-Horowhenua Future Development Strategy and have completed a Housing and Business Capacity Assessment part of this process.</p> <p>Contact has been made with Horowhenua District Council to seek their views on including housing bottom lines for Levin in UFD-P2, however a</p>

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				determination had not been made at the time of writing this evidence. I am prepared to revise my position on this submission point, should evidence from Horowhenua District Council agree to include housing bottom lines for Levin in PC3.
UFD-P4(1)(b) Submission point 11.4	The same rationale on UFD-O3 equally applies to UFD-P4(1)(b).  The NPS-UD assumes that urban environments will change over time. Needing to provide for development outcomes that relate well to the existing built environment has the potential to stymie opportunities for different development outcomes that the NPS-UD is seeking to enable	We request that this policy be amended to exclude reference to <b><u>“that relates well to its surrounding environment”</u></b> .		<b>Accept.</b> I recommend that UFD-P4(1)(b) be amended as requested and agreed at pre-hearing.
UFD-O3 and UFD-P4 Submission point 7.4	We note that some of the provisions of PC3 appear to blur the lines between Regional Council and Territorial Authority functions. We consider that these matters are best left to District and City Plans, as they are currently.	Remove reference to residential density/amenity matters from the proposed provisions of PC3	FS3.10	<b>Accept</b>  Through pre-hearing meetings it was clarified that this point relates to the wording “relates well to its surrounding environment” in UFD-O3 and “relate well to the surrounding environment” in UFD-P4.  I agree that this wording encroaches somewhat into amenity matters that are addressed through district plans.  I recommend UFD-O3(1)(c) be amended as follows:

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>“The intensification and expansion of <i>urban environments</i>*:</p> <p>(c) achieve a quality, sustainable and compact urban form <del>that relates well to its surrounding environment</del>”,</p> <p>I recommend that UFD-P4(1)(b) be amended as follows:</p> <p>“Intensification and expansion of <i>urban environments</i>* is provided for and enabled in <i>district plans</i><sup>^</sup> where:</p> <p>(b) it provides for a range of residential areas that enable different housing types, <i>site</i>* size and densities <del>that relate well to the surrounding environment</del>”</p>
UFD-P4 Submission points 7.6, 10.4, 12.11	While intensification is supported, we acknowledge that greenfield development provides more opportunity to deliver development at the scale needed to meet demand and provides a ‘clean slate’ to deliver better environmental solutions, especially in respect of stormwater management and water sensitive design.	Provide separate policies for Intensification and Greenfields Development as part of PC3, but retain the neutral stance between the two.  Provide more direction in these two policies to encourage more efficient utilisation of residential land,	3.12	<p><b>Reject.</b></p> <p>In my opinion, UFD-P4 already provides this differentiation and Method 2 provides further direction. UFD-P4(1) relates to both intensification and expansion. UFD-P4(2) provides additional criteria for urban expansion to meet in order for development to occur. I am satisfied that this provides and appropriate level of distinction between the requirements associated with</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
		such as density targets or other methods and encourage water sensitive design		greenfield growth (expansion) and intensification. In addition I consider the approach of PC3 aligns with the NPS-UD, including in relation to achieving ‘well-functioning urban environments’. Lastly, while the proposed provisions (including Method 2) do not prohibit greenfield development they do require it to be evidence based as requested by this submission.
UFD-P5 Submission point 17.5	seeks additional wording to enable papakāinga development in urban areas, reduce any ambiguity for those district/city plan provisions and recognise that the diverse need for housing typologies and layouts	Change to: <i>The form and design of subdivision, use and development in urban environments* is managed so that it:</i>  <u>(4) Promotes papakāinga in urban settings by providing plan enabled urban papakāinga, including on general title land.</u>		<b>Reject</b>  In my opinion PC3 adequately enables papakāinga development in urban environments through UFD-P5 and UFD-P7. UFD-P5(2) states a ‘range of housing types and densities, under which papakāinga can be enabled. UFD-P7 focuses on enabling iwi and hapū involvement in urban development to ensure Māori are able to express their cultural traditions and norms. It also requires land use strategies to enable papakāinga housing and marae.  In relation to enabling papakāinga on general title land (as sought by this submission point), I agree. This has been raised through other submissions and I have recommended UFD-P7(2)(b) remove the wording “on Māori owned land”.



Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-P5 Submission point 10.8	Submission identifies a number of instances within PPC3 that potentially creates uncertainty relative to the roles and responsibilities as set-out in legislation.	UFD-P5 is either deleted, or amended to reflect regional outcomes.		<p><b>Accept in part</b></p> <p>In my opinion, there is a role for UFD-P5 in the RPS to guide plan development and decision making for urban environments. Further, other submitters have supported this policy, particularly in relation to its direction around provision of a range of housing types and densities. To make the policy clearer around roles and responsibilities, I recommend additional wording to introduce the policy and improve certainty around roles and responsibilities as follows:</p> <p><u>Territorial Authorities must ensure the form and design of subdivision, use and development in urban environments*</u> is managed so that</p> <ol style="list-style-type: none"> <li>(1) contributes to a <i>well-functioning urban environment*</i>,</li> <li>(2) provides for a range of housing types and densities and employment choices in a manner that integrates with existing and planned <i>development infrastructure*</i>,</li> <li>(3) recognises the importance of marae and papakāinga and enables their development, ongoing use and protection from incompatible development and reverse sensitivity adverse</li> </ol>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p><i>effects*</i>, where existing or planned <i>development infrastructure*</i> of sufficient capacity is, or can be, provided, and</p> <p>(4) enables development across multiple or amalgamated <i>properties*</i> to achieve all of the above.</p>
UFD-P7(2)(b) Submission points 7.11, 10.10, 12.13, 17.5	We consider the wording of <b>UFD-P7(2)(b)</b> to be overly restrictive in that it does not provide for these land uses to establish on landholdings outside of Māori ownership.	Remove the reference to Māori owned land in <b>UFD-P7(2)(b)</b> .	FS3.13	<p><b>Accept.</b></p> <p>I don't believe PC3 intended to limit the ability for Māori to construct papakāinga housing on land that is not held in Māori title. I recommended UFD-P7(2)(b) be amended as follows:</p> <p>...</p> <p>Enables papkāinga housing and marae <del>on Māori owned land,</del></p>
Whole PC3 Submission points 7.12, 10.1	It appears that Horizons approach to PPC3 attempts to replicate the NPS-UD but introduce differences in terminology and structure. These are not supported as they have the potential to create unnecessary implementation challenges	<p>In the absence of establishing regionally specific provisions, care should be taken when RPS includes NPS-UD provisions &amp; makes changes to these.</p> <p>Amend wording match NPS-UD provisions, except where a</p>		<p><b>Accept in part</b></p> <p>Through development of the provisions, alignment with the NPS-UD was considered and evaluated as part of the s 32 report (section 9). The s 32 report considers relying on the wording in the NPS-UD (as per the submitter's request and concluded that the proposed provisions are "anticipated to be more effective and efficient than the alternatives". On that basis, I am comfortable with PC3's reliance on the NPS-UD terminology. However, as pointed out</p>

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		clear regionally specific approach is necessary.		<p>by submitters, there are inconsistencies in terminology used across some provisions of PC3. I have recommended changes to align more firmly with the NPS-UD terminology used for the following provisions.</p> <p><b>UFD-O3(2)</b></p> <p>enable more people to live in, and more businesses and <i>community services</i>* to be located in, areas of an <i>urban environment</i>* where:</p> <p>(a) it is in or near a <i>centre zone</i>* or other area with many employment opportunities, <del>or</del></p> <p>(b) it is well-serviced by existing or planned <i>public transport</i>*, <del>or</del></p> <p>(c) there is a high demand for housing or <i>business land</i>*, relative to other areas within that <i>urban environment</i>*</p> <p><b>UFD-O4</b></p> <p><i>Planning decisions</i>* <del>regarding relating to</del> <i>urban environments</i>* take into account the <u>principles of the Treaty of Waitangi (Te Tiriti o Waitangi)</u><sup>^</sup> <del>principles.</del></p> <p><b>UFD-P4(3)</b></p> <p><i>District plans</i><sup>^</sup> applying to <i>urban environments</i>* must enable heights and density of urban form</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>which are <u>commensurate with equal to</u> the greater of:</p> <p>(a) <del>demonstrated</del> <u>relative</u> demand for housing and/or business use <u>in that location</u>, or</p> <p><b>UFD-P6</b></p> <p><u>Significant <del>development capacity</del>* criteria for evaluating unanticipated or out of sequence development</u></p>
UFD-O1 Submission points 7.12 and 10.1	It appears that Horizons approach to PPC3 attempts to replicate the NPS-UD but introduce differences in terminology and structure. These are not supported as they have the potential to create unnecessary implementation challenges	<p>In the absence of establishing regionally specific provisions, care should be taken when RPS includes NPS-UD provisions &amp; makes changes to these.</p> <p>Amend wording match NPS-UD provisions, except where a clear regionally specific approach is necessary.</p>		<p><b>Reject</b></p> <p>TA officers sought to restrict UFD-O1 to urban environments. My understanding based on the s 32 report is that PC3 was to include the NPS-UD requirements but also preserve the existing One Plan requirements. UFD-O1 replaces existing RPS Objective 3-3. On that basis, I do not support restricting UFD-O1 to urban environments as it would not preserve the existing One Plan provisions of Objective 3-3. In my view the requirements of UFD-O1, even if applied to smaller settlements are reasonable.</p>
UFD-P1	It appears that Horizons approach to PPC3 attempts to replicate the NPS-UD but introduce differences in terminology and structure. These	In the absence of establishing regionally specific provisions, care should be taken when RPS includes NPS-UD		<p><b>Accept in part</b></p> <p>Territorial Authority officers sought to restrict UFD-P1 to urban environments. My understanding based on the s 32 report is that PC3 was to include the</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
Submission points 7.12 and 10.1	are not supported as they have the potential to create unnecessary implementation challenges	provisions & makes changes to these. Amend wording match NPS-UD provisions, except where a clear regionally specific approach is necessary.		<p>NPS-UD requirements but also preserve the existing One Plan requirements. UFD-P1 replaces existing RPS policy 3-4 which applies to all urban areas regardless of size. I do not support this policy only applying to urban environments as it would weaken the existing One Plan provisions. However, I do accept that UFD-P1 introduces a more stringent requirement in demonstrating how sufficient development capacity will be provided – a requirement of the NPS-UD for urban environments. I do not consider it appropriate to place this requirement on smaller settlements that are not defined as ‘urban environments’. I therefore recommend changes to UFD-P1 to add wording to (1) to apply only to urban environments.</p> <p>I recommend UFD-P1 be amended as follows:</p> <p><i>Territorial Authorities*</i> must proactively develop and implement appropriate <i>land</i><sup>^</sup> use strategies to manage urban growth and they should aligns their <i>infrastructure</i><sup>^</sup> asset management planning with those strategies, to ensure the efficient and effective provision of associated <i>infrastructure</i><sup>^</sup> that:</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>(1) for <i>urban environments</i>* demonstrate how <i>sufficient development capacity</i>* for housing and <i>business land</i>* will be provided in the <i>short term</i>*, <i>medium term</i>* and <i>long term</i>* in a well-planned and integrated manner, and</p> <p>(2) for <i>all settlements</i>, ensure there is co-ordination between the location, form and timing of urban growth and the funding, delivery and implementation of <i>development infrastructure</i>*.</p>

Table 6: Analysis of submissions and officer recommendations

### Topic 3: Consistency with the NPS-HPL

141. Submissions to PC3 reasoned that PC3 should be consistent with the NPS-HPL and not cause conflict. Some submitters expressed the view that PC3 needed to place restrictions on the use of highly productive land.

#### Analysis

142. The NPS-HPL took effect on 17 October 2022. Its sole objective is to protect highly productive land for use in land-based primary production, both now and for future generations.<sup>7</sup>
143. Regional councils have responsibilities under the NPS-HPL to identify highly productive land, and manage the effects of subdivision, use and development of that land in an integrated way.
144. Provisions of the NPS-HPL provide regional councils with three years from the commencement date of the NPS-HPL to notify a change to their RPS with maps of all highly productive land in their region. Horizons is in the initial stages of preparing a change to the One Plan RPS to give effect to the implementation requirements of the NPS-HPL, which includes the mapping requirement.
145. Clause 3.5(7) of the NPS-HPL states that until a RPS containing maps of highly productive land in the region is operative, each territorial authority and consent authority must apply the NPS-HPL to rurally zoned land of LUC class 1, 2 or 3 that is not identified for urban development.
146. There is an inherent relationship between the NPS-HPL and NPS-UD. Similar language has been used in the NPS-HPL (e.g. sufficient development capacity, feasible, well-functioning urban environment) to enable interpretation across both national direction documents. Policy 2 and Clause 3.2 of the NPS-HPL requires that highly productive land is managed in an integrated way that encourages local authorities and developers to

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<sup>7</sup> National Policy Statement for Highly Productive Land 2022:  
<https://environment.govt.nz/assets/publications/National-policy-statement-highly-productive-land-sept-22-dated.pdf>

consider the relationship between the NPS-HPL and NPS-UD. Policy 5 of the NPS-HPL directs that urban rezoning of highly productive land is avoided.

147. In my view, the NPS-HPL has some relevance to PC3, and it would be remiss not to explore the scope to address the NPS-HPL in response to the submissions requesting consistency with it, to the extent of this relationship.
148. The NPS-HPL was gazetted one month prior to notification of PC3 and came into effect the same day PC3 was notified. PC3 was therefore drafted without the NPS-HPL in mind and consequently is silent on NPS-HPL obligations. Given PC3 was not intended to give effect to the NPS-HPL, I do not consider there is scope for wholesale changes to attempt to completely implement the NPS-HPL.
149. However, I am of the view that PC3 cannot ignore the provisions of the NPS-HPL completely, such as its policies and objective, and at the least should ensure it does not create conflicts or inconsistency with the NPS-HPL. However, ultimately PC3 could not have been developed in accordance with the NPS-HPL as it did not legally exist when PC3 was being prepared.
150. PC3 includes provisions which refer to 'versatile soils', which include Class 1 and 2 soils. These provisions have been incorporated from the operative RPS. They are only referenced in this part of the One Plan.
151. It was agreed through pre-hearing meetings to replace references to 'versatile soils' with highly productive land, and include a definition in PC3. In my view, adoption of the NPS definition for highly productive land in PC3 would allow Horizons to give partial effect to the NPS-HPL, confined to the One Plan's provision for urban development capacity (i.e. within the scope of PC3). I acknowledge that the NPS-HPL applies to a larger area of soils (LUC classes 1, 2 and 3) whereas the One Plan references versatile soils as being LUC Class 1 and 2 soils. However, the constraints imposed by the NPS-HPL apply now anyway to LUC Class 3 land, in addition to and separate from any requirements in the One Plan, so I am satisfied that this does not go beyond the scope of PC3.
152. Some submitters requested additional amendments to provisions which specify that development of highly productive land would only occur as a last resort and in the most



exceptional of circumstances (submission 13, submission points 13.3, 13.4 and 13.5). In my opinion this wording attempts to go further than the NPS-HPL in constraining the use of 'highly productive land'. I consider it would be premature to agree to those requested changes, ahead of the work required to give effect to the NPS-HPL in the RPS, and is out of scope of PC3.

#### Recommendations

153. In making these recommendations I accept that they are subject to confirmation as to whether they are within scope of this plan change. I have only recommended changes which are, in my view, "on" the plan change. Should the Hearing Panel agree that there is scope, then I would recommend the following changes.
154. I recommend amendments in line with the agreements from the pre-hearing meeting, and Horowhenua District Council submission (submission point 7.7) and other submitters to recognise the NPS-HPL and ensure the inconsistencies in terminology are addressed.
155. I recommend references to versatile soils in PC3 be replaced with 'highly productive land' and the NPS-HPL definition for highly productive land to be included in the definitions.

**Summary of submission points relevant to Topic 3: NPS-HPL consistency**

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
General Submission point 7.7	As PC3 has been notified after the NPS-HPL was gazetted, this plan change presents an opportunity to bring the current One Plan provisions relating to the protection of versatile soils into line with the new requirements and ensure they remain fit for purpose.	Rewording provisions that refer to Class I and II soils to now refer to Class III also, and to change the references from “versatile soils” to “highly productive land” as appropriate.	N/A	<p><b>Accept in part</b></p> <p>The ability to incorporate matters from the NPS-HPL into PC3 was discussed through a pre-hearing meeting. It is raised in a number of submissions. PC3 drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL, and I don’t believe there is scope within PC3 to make wholesale changes to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to identify highly productive land and give effect to the NPS-HPL. However, it is important to ensure PC3 does not conflict with the NPS-HPL. This submission and others, and discussions at the pre-hearing suggest that the use of the term versatile soils does conflict.</p> <p>In response to this and other submissions, changes are recommended to the scope and background, UFD-I2, UFD-O2, UFD-P3, UFD-PR2 and UFD-AER2 provisions of PC 3 <b>to remove reference to versatile soils and replace with the NPS-HPL expression of ‘highly productive land’.</b></p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				These changes largely address the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing.
Whole PC3 Submission point 10.2	Drafting of the PPC3 was carried out prior to the National Policy Statement for Highly Productive Land (NPS-HPL) being finalised. We have some concerns that the directive nature of the NPS-HPL has the potential to create tension with PPC3.	The PPC3 includes elevation of NPS-HPL and considers what amendments may be appropriate at this time, considering RPS Urban form and development as a package		<p><b>Accept in part</b></p> <p>In line with the agreements reached through pre-hearing meetings, I recommend references to ‘versatile soils’ in PC3 be replaced with the term ‘highly productive land’ and the NPS-HPL definition for highly productive land be included in PC3.</p> <p>This relates to scope and background, UFD-I2, UFD-O2, UFD-P3, UFD-PR2 and UFD-AER2.</p>
Scope and background Submission point 12.1	<p>Council recommends that this Section is updated to reflect the NPS-HPL.</p> <p>It is important that towns and settlements that don’t meet the urban environment definition grow in a manner that creates well-functioning communities.</p>	That the section “Urban growth and rural residential subdivision on versatile soils” be updated in its entirety to reflect and align with the NPS-HPL.	FS 3.17	<p><b>Accept</b></p> <p>In line with the agreements reached through pre-hearing meetings, I recommend references to ‘versatile soils’ in PC3 be replaced with the term ‘highly productive land’ and the NPS-HPL definition for highly productive land be included in PC3.</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-I2 Submission point 12.4	Council suggests further consideration is given to the drafting of the issues.	Remove or update UFD-I2 to reflect the NPS-HPL		<p><b>Accept</b></p> <p>In line with the agreements reached through pre-hearing meetings, I recommend references to ‘versatile soils’ in PC3 be replaced with the term ‘highly productive land’ and the NPS-HPL definition for highly productive land be included in PC3. UFD-I2 be amended as follows:</p> <p><b>UFD-I2: Adverse <i>effects</i>* from urban growth and rural residential <i>subdivision</i>* on <del>versatile soils</del> <u>highly productive land</u>*</b></p> <p>Urban growth and rural residential <i>subdivision</i>* (“lifestyle blocks”), on <u>highly productive land</u>* <del>versatile</del> soils may result in those soils no longer being available for use as production land. These development pressures often occur on the fringes of some of the Region's urban areas. <del>most notably Palmerston North.</del></p>
Objectives and Policies Submission point 12.6	Council suggests a number of amendments we consider would improve implementation of the RPS.	Remove all objectives and policies related to versatile land, or make amendments to ensure alignment with the NPS-HPL		<p><b>Accept</b></p> <p>In line with the agreements reached through pre-hearing meetings, I recommend references to ‘versatile soils’ in UFD-O2 and UFD-P3 be replaced with the term ‘<u>highly productive land</u>’</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				and the NPS-HPL definition for highly productive land be included in PC3
UFD-PR2 Submission point 12.19		Remove or update UFD-PR2 to reflect/align with the NPS-HPL.		<p><b>Accept</b></p> <p>I recommend UFD-PR2 be amended as requested.</p> <p><b>UFD-PR2: Urban growth and rural residential subdivision* on <u>highly productive land*</u><del>versatile soils</del></b></p> <p>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 <i>subdivision*</i> <u>away from <u>highly productive land*</u></u><del>onto less versatile soils</del> may increase travel distances, costs of service provision or other economic or environmental costs of <i>land*</i> development. However, allowing urban expansion onto <u><i>highly productive land*</i></u><del>versatile soils</del> 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 <i>land*</i> to be used for productive use. <i>Territorial Authorities*</i> need to</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				weigh all relevant matters when making <i>land*</i> use decisions.
UFD-O2 Submission point 13.3	UFD-O2 on p4 is not strong enough in my view. Versatile soils, especially those close to urban areas are of immense value from a sustainability and resilience perspective.	Change to read: To ensure that Territorial Authorities* consider the benefits of retaining Class I and II <sup>1</sup> versatile soils <sup>2</sup> for use as production land* when providing for urban growth and rural residential subdivision* <u>and give it a weighting in decision making that would only see it used for urban growth or rural residential purposes in the most exceptional of circumstances.</u>		<b>Reject</b> It is my view that the requested changes seek to address the requirements of the NPS-HPL by constraining the use of highly productive land. PC3 was drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL, and I don't believe there is scope for wholesale changes to attempt to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to give effect to the NPS-HPL and the requested changes should be tested through that process.  <b>However, in response to other submissions, changes are recommended to UFD-O2 to remove reference to 'versatile soils' and replace with the NPS-HPL definition of 'highly productive land'.</b> This change partially addresses the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already).
UFD-P3	Same rationale as above.	Change to read as:		<b>Reject</b>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
Submission point 13.4		In providing for urban growth (including implementing Policy 3-4), and controlling rural residential subdivision* (“lifestyle blocks”), Territorial Authorities* must pay particular attention to the benefits of the retention of Class I and II versatile soils for use as production land^ in their assessment of how best to achieve sustainable management <u>and give it a weighting in decision making that would only see it used for urban growth or rural residential purposes in the most exceptional of circumstances.</u>		For the reasons above. The NPS-HPL which applies separately directs the same outcome as sought. However to include this wording as part of PC3 , would in my opinion be beyond the scope of PC3, and should also be tested through the separate plan change process to give effect to the NPS-HPL (yet to be commenced by Council)
UFD-P4(2) Submission point 13.5	I would also like to see the protection of versatile soils mandated.	Addition to policy: <u>(e) avoids using versatile soils except in the most exceptional of circumstances</u>		<b>Reject</b> For the reasons outlined in response to submission points 13.3 and 13.4.
UFD-O2 Submission point 14.4	The existing objective and policy do not reflect the provisions which have since been introduced to national policy direction via the NPS-HPL and could potentially lead to conflict between the RPS and NPS-HPL.  Fonterra therefore seek amendment to UFD-O2 and UFD-P3	Amend UFD-O2 to read as follows:  <i>To ensure that Territorial Authorities consider the benefits of retaining <u>Highly Productive Land</u>* Class I and II versatile soils for use as production land when providing for urban growth and rural residential subdivision*.</i>		<b>Accept</b> I recommend the wording of UFD-O2 be amended as requested.

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	to change references to versatile soils to be highly productive land as per the NPS-HPL.			
UFD-P3 Submission point 14.5	The existing objective and policy do not reflect the provisions which have since been introduced to national policy direction via the NPS-HPL and could potentially lead to conflict between the RPS and NPS-HPL.  Fonterra therefore seek amendment to UFD-O2 and UFD-P3 to change references to versatile soils to be highly productive land as per the NPS-HPL	<i>In providing for urban growth, and controlling rural residential subdivision* (“lifestyle blocks”), Territorial Authorities* must pay particular attention to the benefits of the retention of <u>Highly Productive Land Class I and II versatile soils for use as production land</u> in their assessment of how best to achieve sustainable management.</i>		<b>Accept</b>  I recommend the wording of UFD-P3 be amended as requested.
Glossary Submission point 14.6	As above	<i>Add the following to the glossary of PC3: <u>Highly Productive Land:</u> <u>has the same meaning as in the National Policy Statement for Highly Productive Land 2022</u></i>		<b>Accept</b>  I recommend the NPS-HPL definition for Highly Productive Land has be included in PC3, following the same format as the other definitions (in line with the National Planning Standards).
UFD-O2	We think that the phrase ‘consider the benefits of retaining class I and	<i>Amend this provision as follows:</i>		<b>Accept in part</b>  In response to this and other submissions, changes are recommended to the scope and



Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
Submission point 19.1	II soils' needs a stronger word than consider.	<i>To ensure that Territorial Authorities give due consideration to the benefits of retaining class I and II soils</i>		background UFD-O2 <b>to remove reference to versatile soils and replace with the NPS-HPL expression of 'highly productive land'.</b>  These changes largely address the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing.  I do not recommend changing the word 'consider' as requested by the submitter. I believe the current wording has sufficient weight in conjunction with the requirements of the NPS-HPL to protect highly productive land.
UFD-P3 Submission point 19.4	We suggest that this and other relevant parts of the Urban Development Plan Change (PC3) are cross-referenced to the NPS-HPL 2022.	<i>Cross reference this policy to the NPS-HPL.</i>		<b>Accept in part</b>  The ability to incorporate matters from the NPS-HPL into PC3 was discussed through a pre-hearing meeting. It is raised in a number of submissions. PC3 drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL, and I do not believe there is scope within PC3 to make wholesale changes to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to identify highly productive land and give effect to

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>the NPS-HPL. However, it is important to ensure PC3 does not conflict with the NPS-HPL. This submission and others, and discussions at the pre-hearing suggest that the use of the term versatile soils does conflict.</p> <p>In response to this and other submissions, changes are recommended to UFD-P3 <b>to remove reference to versatile soils and replace with the NPS-HPL expression of <u>'highly productive land'</u></b>.</p> <p>These changes largely address the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing</p>

*Table 7: Topic 3 Analysis of submissions and officer recommendations*

#### **Topic 4: Active and public transport**

156. Submitters made various points relating to provision of public and active transport as part of urban development and intensification through PC3. For some submitters there was the desire to ensure a variety of transport modes are provided for in urban development. Other submitters expressed concern that the wording of PC3 created a risk that urban development could be constrained by lack of public transport (both planned and/or delivered) given this is the responsibility of regional council, and follows a different planning and funding process under the Land Transport Management Act.
157. Submitters sought to ensure that the wording of PC3 does not foreclose future development options due to the absence of existing or planned public transport.
158. These matters were discussed at a pre-hearing meeting where a range of agreements were reached and recorded through the pre-hearing meeting notes. For brevity I do not repeat the agreements reached at the pre-hearing meeting in this report.
159. Updated provisions were circulated to the pre-hearing meeting attendees prior to finalising this s 42A report.

#### Matters raised by submitters

160. Horowhenua District Council (submission 7) and Summerset Holdings Ltd (submission 6) both seek changes to ensure urban development is not foreclosed if public transport is not already in place. Requested changes seek to ensure development enables provision of public transport if it is not already in place.
161. Kāinga Ora opposed Horowhenua District Council's submission (Further submission 3) on the basis that PC3 already proposes reference to existing or planned public transport.
162. The Public Health Service, Te Whatu Ora MidCentral Health (submission 19) expressed concern that active transport was not adequately provided for by PC3.
163. Waka Kotahi (submission 2) and Summerset Holdings Limited (submission 6) both sought amendments to various provisions to ensure a development is well-connected by a variety of transport modes and that the necessary infrastructure to support active transport is provided.

164. Dr Sharon Stevens (submission 8) supports inclusion of active and public transport, however sought changes to ensure UFD-P8 provides for 'safe' active transport and requested specific reference to including protected cycleways.
165. Dr Chris Teo-Sherrell (submission 13) seeks changes to UFD-P8(2)(a) requiring walking and cycling to be integrated into land use development.

#### Analysis

166. With regards to planning and provision of public transport, this is a function of the regional council. The NPS-UD definition of planned public transport is not helpful as it refers to public transport identified in a Regional Land Transport Plan. In reality, a Regional Land Transport Plan does not identify specific public transport proposals – its role is to set the high level direction for all transport across the region. The Regional Public Transport Plan is the document which outlines public transport proposals. The Regional Public Transport Plan gives effect to the Regional Land Transport Plan and outlines the direction for public transport, along with planned public transport and investigations for future services. Funding for public transport is sought through Long Term Plans and the Regional Land Transport Plan.
167. Therefore reliance on the NPS-UD definition for 'planned' public transport has the potential to affect urban development proposals. Given the lack of control district plans and councils have on planning and delivery of public transport, I agree with Horowhenua District Council that the Objectives and Policies of PC3 should be amended. The key outcome is to ensure urban development and intensification enables public transport (where it isn't available currently).
168. Regarding active transport, on the whole I consider PC3 adequately provides for the provision of this through urban development and intensification. Method 2 details how active transport is to be provided for, and gives effect to UFD-O3. However, there is an opportunity in UFD-O3(2)(b) to be more explicit about provision of active transport.
169. I agree with Waka Kotahi, that urban development and intensification should enable a variety of transport modes. This is key to ensuring access and connectivity within communities. I also agree that the infrastructure necessary to enable active transport should be provided for as this is a key part of giving people transport choice.

170. I do not support including 'safe' in UFD-P8 as safe active travel is already provided in UFD-O3(1)(a). I also consider that placing a requirement in the policies regarding protected cycleways, goes beyond the scope of the RPS in terms of specificity.
171. I do not support Waka Kotahi's request to include active transport in UFD-P4(1)(d). This clause relates to development infrastructure which is defined by the NPS-UD and in PC3. Development infrastructure includes all land transport (as defined by the LTMA), which in my opinion includes active transport. I therefore do not consider it necessary to reference active transport in this policy clause.
172. I support Dr Teo-Sherrell's requested change to UFD-P8(2)(a) to require walking and cycling to be integrated into land use development as it aligns with other Objectives in PC3 which require development to be connected by a variety of transport modes.

#### Recommendations

173. That UFD-O3(1)(d) and (2)(b), and UFD-P4(1)(d) be amended to support urban development to enable provision of public transport, where it isn't already provided.
174. That UFD-O3(2)(b) be amended to include active transport.
175. That UFD-P4(4) be amended to include the requirement for active transport and its associated infrastructure to be enabled.
176. That UFD-P4(2)(c) and UFD-P6(1)(b) be amended to ensure urban development and intensification provides for a variety of transport modes.
177. That UFD-P8(2)(a) be amended to ensure sustainable transport modes are integrated into land use development.

**Summary of submission points relevant to Topic 4: Public and active transport**

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
<p>UFD-O3 Submission 7.5</p>	<p>We have concern that the wording of provisions such as <b>UFD-03</b> and <b>UFD-P4(1)(d) and (2)(c)</b> may have unintended for communities such as the Horowhenua District. We would prefer to see wording that recognises that greenfield areas in particular should be designed to accommodate future public transport</p>	<p>Amend references to/requirements for public transport services/corridors to recognise that public transport may not yet be available to all urban settlements, and require these services to instead be provided for, to ensure urban growth is more futureproof.</p> <p>Clarify that the provision of public transport is a Regional Council function</p>	<p>FS3.11</p>	<p><b>Accept</b></p> <p>I agree this objective should be amended to remove the risk of interpretation that forecloses urban development because public transport is not already in place. Provision of public transport is the responsibility of regional council. Public transport planning and implementation is guided by the Regional Public Transport Plan and is subject to a separate planning and funding process. The key requirement is that public transport is able to be implemented as part of any intensification or expansion of the urban environment.</p> <p>I recommend amending the wording of <b>UFD-O3(1)(d)</b> as follows:            ...Are, <u>or planned to be</u>, well connected by a choice of transport modes including public transport...</p> <p>I recommend amending the wording of <b>UFD-O3(2)(b)</b> as follows:            ...<u>Is able to be</u>, or is, well serviced by existing or planned public transport...</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-O3(2)(b) Submission point 19.2	We wish to include active transport under section UFD-O3 (2)(b). Active transport is accessible and well connected by a choice of transport modes including walking, cycling and public transport	Under UFD-O3 (2)(b) add the suggested words “and includes options that encourage active transport”.		<p><b>Accept in part</b></p> <p>Method 2 details how active transport is to be provided for and gives effect to UFD-O3. For that reason, I don’t recommend including the word ‘encourage’ but accept that UFD-O3(2)(b) could be more explicit about provision of active transport for urban expansion or intensification.</p> <p>I recommend UFD-O3(2)(b) be amended as follows:</p> <p>...It is well-served by existing or planned public transport <u>and active transport</u>, or...</p>
UFD-P4(4) Submission point 19.6	We would suggest a minor wording change to sub clause (4) by way of enabling and encouraging active transport	Under sub clause (4) include the words ‘and encouraging’.		<p><b>Reject</b></p> <p>I consider the notified wording is sufficient, noting that Method 2 provides more detail on how active transport should be enabled.</p>
UFD-P4(1)(d) Submission point 7.5	We have concern that the wording of provisions such as <b>UFD-03</b> and <b>UFD-P4(1)(d) and (2)(c)</b> may have unintended for communities such as the Horowhenua District. We would prefer to see wording that recognises that greenfield areas in particular should be designed to accommodate future public transport.	Amend references to/requirements for public transport services/corridors to recognise that public transport may not yet be available to all urban settlements, and require these services to instead be provided for, to ensure urban growth is more futureproof.	FS3.11	<p><b>Accept</b></p> <p>I agree UFD-P4(1)(d) should be amended to remove the risk of interpretation that forecloses urban development because public transport is not already in place. Provision of public transport is the responsibility of regional council. Public transport planning and implementation is guided by the Regional Public Transport Plan and is</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
		Clarify that the provision of public transport is a Regional Council function.		<p>subject to a separate planning and funding process. The key requirement is that public transport is able to be implemented as part of any intensification or expansion of the urban environment.</p> <p>I recommend amending the wording of <b>UFD-P4(1)(d)</b> as follows:</p> <p>...Development is well serviced by existing or planned <i>development infrastructure*</i> and <u>enables provision</u> of <i>public transport*</i>, and <i>additional infrastructure*</i> required to serve the <i>development capacity*</i> is likely to be achieved,</p>
UFD-P4(1)(d) Submission point 2.8	Waka Kotahi generally supports this policy subject to amendments to recognise the importance of connecting active and public transport modes and transport corridors to provide a well-functioning urban environment	Support with amendments: <i>(1)(d) development is well serviced by existing or planned development infrastructure*, active and public transport*, and additional infrastructure* required to service the development capacity*...</i>		<p><b>Reject</b></p> <p>Development infrastructure includes land transport (as defined in the LTMA). I therefore think provision for active transport is already provided for by this policy. Public transport has been singled out in this policy for the reason that it is not controlled by territorial authorities.</p>



Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-P4(2)(c) Submission point 2.9	Waka Kotahi generally supports this policy subject to amendments to recognise the importance of connecting active and public transport modes and transport corridors to provide a well-functioning urban environment.	Amend <i>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: ....</i> <i>(c) is well-connected <u>by a variety of transport modes and <del>along</del> transport corridors,</u></i>		<b>Accept</b> I recommend the wording be amended as requested
UFD-P4(4) Submission point 2.10	generally supports this policy subject to amendments to recognise the importance of connecting active and public transport modes and transport corridors to provide a well-functioning urban environment.	<i>4) Local authority transport plans and strategies must establish ways to contribute to well-functioning urban environments* through the provision of public transport* services and by enabling active transport* <u>infrastructure</u></i>	FS3.1	<b>Accept in part</b> I agree that the policy should also refer to enabling the infrastructure necessary to support active transport. However I don't support removing "by enabling" active transport from this policy. Enabling active transport and its associated infrastructure aligns more wholly with the NPS-UD definition for well-functioning urban environments. I recommend UFD-P4(4) be reworded as follows: ... Local authority transport plans and strategies must establish ways to contribute to well-functioning

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				urban environments* through the provision of public transport services and by enabling active transport, <u>including its associated infrastructure</u>
UFD-P6(1)(b) Submission point 2.12	supports this policy and requests minor amendments to 1(b) to ensure that the connectivity of active and public transport modes and transport corridors, and commercial services (including employment opportunities) is considered when considering unanticipated or out of sequence development.	Support with amendments: <i>(1) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: ....</i> <i>(b) is well-connected <u>by a variety of transport modes and along transport corridors, and to community and commercial services, and open space,</u></i> ...	FS3.2	<b>Accept in part</b> I agree with the requested amendments to provide a variety of transport modes. However I do not support inclusion of commercial activities in this policy. The NPS-UD definition of ‘community activities’ (already included in Policy UFD-P6) explicitly includes commercial services. It would therefore be an unnecessary duplication to include commercial services in this policy. I recommend UFD-P6(b) be amended as follows: ...Is well-connected <u>by a variety of transport modes and along transport corridors, and to community services, and open space...</u>
UFD-P6(1)(b) Submission point 6.6	Summerset supports the intention of this policy, however, seeks recognition within the provision that the unanticipated or out of sequence development may be appropriate prior to the establishment of transport corridors, community services*, and open space.	Amend: <i>(b) the development is, <u>or will be, well-connected along existing or anticipated transport corridors, and to existing or anticipated community services*, and existing or anticipated open space</u></i>	FS3.8	<b>Accept in part</b> I agree the policies should not require all necessary infrastructure to be installed, but to also be programmed or sequenced in some strategic planning document. This was discussed at a pre-hearing meeting in response to submission point

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>2.9 (Waka Kotahi) and amended wording was agreed as follows.</p> <p>Amend UFD-P6(1)(b) wording to:</p> <p>...The development is well-connected along <u>by a variety of transport modes and</u> transport corridors, and to community services, and open space....</p> <p>In my view the amendments above address this submission point</p>
<p>UFD-P6(1)(e) Submission point 7.10</p>	<p>It would be clearer to reword UFD-P6(e) to “adequate existing development infrastructure, or sufficient upgrades are able to be made to existing development infrastructure...”</p>	<p>Reword <b>UFD-P6(e)</b> as requested.</p>		<p><b>Accept in with amendments</b></p> <p>I agree that the policy should not require all necessary infrastructure to be installed, but to also be programmed or sequenced in some strategic planning document. However, the criteria of UFD-P6 seeks to place more stringency on out of sequence developments to ensure they do not adversely affect other planned development. I have therefore recommended amending wording of UFD-P6(1)(e) to:</p> <p>...There is adequate existing, or upgraded <u>planned upgrades to</u> development infrastructure, to support development of the land without adverse effects on the provision or capacity of other</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				planned development infrastructure expenditure, and...
UFD-P8(2)(a) Submission point 13.6	Future development should be putting public transport and active transport ahead of transport by motor car, whether internal combustion- or electrically powered, to achieve liveability and sustainability objectives	Territorial Authority* decisions and controls: (a) on subdivision* and land* use must ensure that sustainable transport options such as public transport*, walking and cycling can be integrated into land* use development, and		<b>Accept</b> I recommend the wording of UFD-P8(2)(a) be amended as requested.

Table 8: Topic 4 Analysis of submissions and officer recommendations



## Topic 5: Climate change adaptation

178. A number of submitters raised points seeking to understand and ensure climate change adaptation through PC3 is achievable. This topic was discussed at a pre-hearing meeting where agreements on matters were reached.

### Matters raised by submitters

179. Palmerston North City Council (submitter 11) expressed concerns about the phrasing of UFD-O5 and UFD-P8(1). The submission notes that urban development will always result in a degree of additional greenhouse gas emissions associated with construction, additional population and travel, and additional infrastructure. Palmerston North City Council's view is that the plan needs to be clear whether the outcome intended is to reduce greenhouse gas emissions, or whether development should be managed in a way that reduces the relative potential for generating greenhouse gas emissions. The proposed wording could be read in a way that requires greenhouse gas reductions in all circumstances, with a risk that development doesn't strictly meet this policy. Palmerston North City Council seeks amendments to this policy to support reductions in greenhouse gas emissions.
180. Fonterra (submission 14) requested UFD-P8(1)(a) include wording to require minimisation of contributions to climate change 'as far as reasonably practicable' to ensure effects on climate change also take into account other factors that may impact reductions.
181. Horowhenua District Council (submission 7) and Kāinga Ora (submission 17) both seek a definition for 'best practice resilience' in the context of impacts on climate change which is referenced in UFD-P8(1)(c). Horowhenua District Council is concerned that it may require gold-plated solutions in every situation, when something more pragmatic may suffice. Kāinga Ora proposed a definition as follows:

Best practice resilience has the same meaning as in the Glossary of terms in Appendix 1 of the National Adaptation Plan 2022 (as set out below):

means the capacity of interconnected social, economic and ecological systems to cope with a hazardous event, trend or disturbance, by responding or

reorganising in ways that maintain their essential function, identity and structure. Resilience is a positive attribute when it allows systems to maintain their capacity to adapt, learn and/or transform.

182. Public Health Service, Te Whatu Ora MidCentral Health (submission 19) seeks to ensure PC3 requires provision for emergency water supplies as part of climate change resilience.
183. **Green infrastructure:** Dr Sharon Stevens (submission 8) sought amendments to place addition emphasis on green infrastructure for flood mitigation, which in her view is in conflict (or at least tension) with other aspects of the One Plan.
184. **Clarification of UFD-O5:** Kāinga Ora (submission 17) seeks amendments to UFD-O5 to provide clarity and greater direction. The changes sought are as follows:

**UFD-O5**

Regional and district plans contribute to the region being Urban environments\* resilient to the effects\* of climate change^ and support reductions in greenhouse gas^ emissions, and where climate change mitigation is an integral part of well-functioning urban environments\* and rural areas.

Analysis

185. Palmerston North City Council's submission point regarding amendments to UFD-O5 and UFD-P8(1) to support reductions in greenhouse gas emissions was discussed at pre-hearing. It was not the intention of PC3 to require development to reduce greenhouse gas emissions in the sense that development must improve the existing environment – rather, any development and expansion should occur in a way that supports reductions in emissions, in line with Objective 8 of the NPS-UD. In my opinion, the current wording of UFD-O5 is sufficiently clear that the intention is to ensure development supports reductions in greenhouse emissions. Method 2 also provides additional guidance in this respect. It was agreed the Objective does not need to go further to address this submission point. However Policy UFD-P8 does not align with UFD-O5 and therefore requires amendment to address this submission point. Agreement was reached at the pre-hearing meeting to amend UFD-P8(1) to refocus and provide a pathway requiring urban development to support reductions in greenhouse emissions.

186. Fonterra’s request to take into require minimisation of contributions to climate change ‘as far as reasonably practicable’ was discussed at pre-hearing. Based on the understanding in other NZ jurisdictions (e.g. Southland Water and Land Plan endorsed by the Environment Court) minimise means ‘reduce to the lowest practicable extent’. Fonterra accepted this rationale and agreed not to pursue this submission point.
187. **Best practice resilience:** the submission points requesting clarification on what is meant by “best practice resilience” in the context of UFD-P8 are valid. In the absence of further guidance or a definition of what is encompassed by best practice resilience, this policy creates uncertainty for users. In my view the words ‘best practice’ are redundant as the word ‘resilience’ on its own sufficiently conveys that development of urban environments would need to have the capacity to withstand the impacts of climate change as addressed by this policy and required by the NPS-UD. The intention of Policy UFD-P8(1) is to ensure development of urban environments occurs in a way that reduces the risks to those environments from climate change. What is an appropriate level of resilience improvements should be at the discretion of the local authority and will vary depending on the urban environment and its constraints. I recommend removing reference to ‘best practice’ in UFD-P8(1)(C).
188. **Emergency water supply:** In my view provision of emergency water supply and messaging around encouraging the community to install such facilities is typically the function of Territorial Authorities. In many cases this will be addressed in territorial authority Emergency Management Plans. I therefore do not consider this amendment to be appropriate in the context of the RPS.
189. **Green infrastructure:** Regarding Dr Stevens’ submission relating to additional emphasis on green infrastructure for flood mitigation, I am of the view that this is already sufficiently addressed by UFD-P8(1)(a) which refers to water sensitive design and nature-based solutions. I do not perceive any conflict with other provisions of the One Plan.
190. **Clarification of UFD-O5:** The current wording of this Objective aligns strongly with the wording in Objective 8 and Policy 1(f) of the NPS-UD. In my view UFD-O5 is sufficient in its intent. Including reference to Regional and District Plans does not add certainty to the Objective. The requested changes to incorporate climate change mitigation as a part



of well-functioning urban environments and rural areas also goes beyond what is specified in the NPS-UD. While mitigation is a key part of resilience to climate change and greenhouse gas emissions, it is not the only method for achieving this outcome. I therefore consider it unnecessarily prescriptive to reference this in UFD-O5. Lastly, the reference to rural areas is not supported as this Objective only relates to urban environments.

### Recommendations

191. That UFD-P8(1) be amended as agreed through the pre-hearing meeting on Topic 5 as follows:

Urban environments are developed in ways that support reductions in ~~reduce~~ greenhouse gas emissions and improve resilience to the effects of climate change...

192. Best practice resilience: That UFD-P8(1)(c) be amended to remove the words 'best practice'. As follows:

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

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

**Summary of submission points relevant to Topic 5: Climate change adaptation**

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-O5 Submission point 11.2	If strictly interpreted, this objective could be difficult to give effect to.	That revision of this objective be made to create a clearer policy cascade, so that plan users can be clear whether the outcome intended is to reduce greenhouse gas emissions, or whether development should be managed in a way that reduces the relative potential for generating greenhouse gas emissions.		<p><b>Reject</b></p> <p>Discussions through the pre-hearing meeting on Climate Change and Adaptation clarified that the current wording of UFD-O5 is sufficiently clear that the intention is to ensure development supports reductions in greenhouse emissions. Method 2 also provides additional guidance in this respect. It was agreed the Objective does not need to go further to address this submission point. However Policy UFD-P8 does not align with UFD-O5 and therefore requires amendment to address this submission point. Parties agreed to amend UFD-P8 (discussed further under submission point 11.5).</p>
UFD-O5 Submission point 17.1	supports this policy but seeks further expansion to make the objective clearer and directive.	<p>Change to:</p> <p><i><u>Regional and district plans contribute to the region being <del>Urban environments</del>* resilient to the effects* of climate change^ and support reductions in greenhouse gas^ emissions, and where climate change mitigation is an integral part of well-</u></i></p>		<p><b>Reject</b></p> <p>The current wording of this Objective aligns strongly with the wording in Objective 8 and Policy 1(f) of the NPS-UD. In my view UFD-O5 is sufficient in its intent. Including reference to Regional and District Plans does not add certainty to the Objective.</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
		<u>functioning urban environments* and rural areas.</u>		The requested changes to incorporate climate change mitigation as a part of well-functioning urban environments and rural areas also goes beyond what is specified in the NPS-UD. While mitigation is a key part of resilience and greenhouse gas emissions, it is not the only method for achieving this outcome. I therefore consider it unnecessarily prescriptive to reference this in UFD-O5. Lastly, the reference to rural areas is not supported as this Objective only relates to urban environments. In my view expanding it to include rural environments, goes beyond the scope of PC3 and the NPS-UD.
UFD-P8 Submission point 19.9	in times of drought, earthquake or climate change emergencies, consideration should be given to emergency water supplies	That this policy UFD-P8: Urban development and climate change^ be re-worded to include a statement regarding emergency water supplies		<b>Reject</b> Provision for emergency water supplies is generally a function of territorial authorities. It may also be addressed in emergency management plans. In my opinion, it would be out of step with the remainder of this policy to place a prescription on providing for emergency water supplies.
UFD-P8 Submission point 8.2	support the plan’s interest in compact housing and infill and also the preference for infill over greenfield development. I support the plan’s	Amendments sought: <ul style="list-style-type: none"> <li>• additional emphasis on green infrastructure for flood mitigation, a</li> </ul>		<b>Reject</b> I consider the requests from this submission to go beyond the requirements of the NPS-UD.

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	inclusion of active and public transport. I support the provisions for “water-based design and nature-based solutions” and consideration given to increases “in the scale and frequency of natural hazard events	value that is in conflict (or at least in tension) with other aspects of the plan. <ul style="list-style-type: none"> <li>that the One Plan actively promotes well-designed rain gardens inclusive of biodiversity</li> </ul>		UFD-P8 already refers to “water sensitive design and nature based solutions” – more specific details would be the responsibility of District Plans.
UFD-P8(1) Submission point 11.5	None stated but it is understood from the pre-hearing meeting that PNCC’s concern that growth of any extent must involve some degree of additional greenhouse emissions (additional population, additional travel, additional construction materials, additional infrastructure provision). The wording of UFD-P8 is unclear in this regard.	None stated but it is understood from pre-hearing meetings that PNCC considers the policy should be amended to support reduction in greenhouse gas emissions (rather than to require reductions in all situations as the wording currently suggests)		<p><b>Accept</b></p> <p>I recommend the wording of UFD-P8 (1) be reworded as follows:</p> <p><i>Urban environments*</i> are developed in ways that <u>support reductions in</u> <del>reduce</del> <i>greenhouse gas</i><sup>^</sup> emissions and improve resilience to the <i>effects</i><sup>*</sup> of <i>climate change</i><sup>^</sup> by:</p> <p>(a) use of urban design, building form and <i>infrastructure</i><sup>^</sup> to minimise the contribution to <i>climate change</i><sup>^</sup> of the development and its future use, including (but not limited to) <i>energy efficiency</i><sup>*</sup> (including methods to ensure whole-of-life <i>energy efficiency</i><sup>*</sup>), <i>water</i><sup>*</sup> efficiency, <i>waste</i><sup>*</sup> minimisation, transportation modes (including use of <i>public transport</i><sup>*</sup> and <i>active transport</i><sup>*</sup>) water-sensitive design and nature-based solutions,</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				<p>(b) urban development being compact, well designed and sustainable, and</p> <p>(c) requiring best practice resilience to, the impacts of <i>climate change</i><sup>^</sup>, including <i>sea level rise</i><sup>*</sup> and any increases in the scale and frequency of <i>natural hazard</i><sup>*</sup> events</p>
UFD-P8(1)(a) Submission Point 14.3	there are many varied and complex drivers for urban land development design, and it is appropriate that effects on climate change are able to be taken into account alongside other drivers.	<p>Amend UFD-P8(1) to read as follows:</p> <p><i>(1) Urban environments* are developed in ways that reduce greenhouse gas<sup>^</sup> emissions and improve resilience to the effects* of climate change<sup>^</sup> by:</i></p> <p><i>(a) use of urban design, building form and infrastructure<sup>^</sup> to minimise, <u>as far as reasonably practicable</u>, the contribution to climate change<sup>^</sup> of the development and its future use, including (but not limited to) energy efficiency* (including methods to ensure whole-of-life energy efficiency*), water* efficiency, waste* minimisation, transportation modes (including use of public transport* and active transport*) water sensitive design and nature-based solutions,</i></p>		<p><b>Reject</b></p> <p>I am of the view that ‘minimise’ is understood in other NZ jurisdictions (e.g. Southland Water and Land Plan endorsed by the Environment Court) to mean ‘reduce to the lowest practicable extent’. On that basis, I do not consider the additional wording requested through this submission point to be necessary.</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-P8(1)(c) Submission point 7.13	Unclear about what is meant by best practice resilience – is it national direction, climate change adaptation or something else	More clarification on best practice resilience		<p><b>Accept in part</b></p> <p>I agree that it is unclear what is meant by best practice resilience. In analysing the policy further I consider the words ‘best practice’ should be removed from UFD-P8(1)(c) as they add unnecessary detail and go beyond the intent of the NPS-UD.</p> <p>I recommend UFD-P8(1)(c) be amended as follows:</p> <p>Urban environments* are developed in ways that reduce greenhouse gas^ emissions and improve resilience to the effects* of climate change^ by:</p> <ul style="list-style-type: none"> <li>a..</li> <li>b..</li> <li>c. requiring <del>best practice</del> resilience to, the impacts of climate change^, including sea level rise* and any increases in the scale and frequency of natural hazard* events.</li> </ul>
UFD-P8(1)(c) Submission point 17.6	this policy needs to refer to a definition for “best practice resilience” and a definition of best practice is introduced as this term is currently ambiguous.	<p>Definitions to be added to One Plan as below:</p> <p><u><i>Best practice resilience - has the same meaning as in the Glossary of terms in</i></u></p>		<p><b>Accept in part</b></p> <p>I agree that it is unclear what is meant by best practice resilience. In analysing the policy further I consider the words ‘best practice’ should be removed from UFD-P8(1)(c) as they</p>

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
		<p><u>Appendix 1 of the National Adaption Plan 2022 (as set out below):</u></p> <p><u>means the capacity of interconnected social, economic and ecological systems to cope with a hazardous event, trend or disturbance, by responding or reorganising in ways that maintain their essential function, identity and structure. Resilience is a positive attribute when it allows systems to maintain their capacity to adapt, learn and/or transform.</u></p>		<p>add unnecessary detail and go beyond the intent of the NPS-UD.</p> <p>I recommend UFD-P8(1)(c) be amended as follows:</p> <p>Urban environments* are developed in ways that reduce greenhouse gas^ emissions and improve resilience to the effects* of climate change^ by:</p> <p>a..</p> <p>b..</p> <p>c. requiring best practice resilience to, the impacts of climate change^, including sea level rise* and any increases in the scale and frequency of natural hazard* events.</p>

Table 9: Topic 5 Analysis of submissions and officer recommendations





## Remaining general submissions

### Maintenance and enhancement of freshwater and the natural environment

193. Fish and Game NZ (submission 5) requested relief seeking to ensure PC3 maintains or enhances the natural environment within urban areas. It is my understanding that the intention of Fish and Game's submission is to ensure that urban growth is not enabled at the expense of the quality of the natural environment (including freshwater receiving environments). A number of amendments were sought to PC3 provisions along this vein. These requests were discussed at the pre-hearing meeting on climate change adaptation (where Fish and Game were an attendee). It became apparent through the pre-hearing meeting that although the submission seeks *improvement* of the environment, the Fish and Game position was to prevent worsening of conditions and a desire to include specific outcomes for the environment in PC3 (not only outcomes for urban growth).
194. My position at the pre-hearing meeting was that the outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3. I also consider it is premature to attempt to get ahead of Horizons' NPS-FM plan change by inserting references to elements of the NPS-FM as the submission seeks to do. The process of community engagement to determine the amendments necessary to the One Plan to give effect to the NPS-FM is under way. Once determined, they will be proposed through a separate change to the One Plan, which will follow the freshwater planning process under sub-part 4 of the RMA.
195. In short, my view largely remains the same. I believe PC3 is limited by the scope of the notified provisions and the NPS-UD. I am also cognisant of other planning processes being undertaken by Horizons to respond to other national instruments – namely the NPS-FM. It is important that PC3 does not frustrate the outcomes of the freshwater plan review underway at present. With that said, what PC3 does do is respond in part to Objective 1 and Policy 3 of the NPS-FM. UFD-O3(e) – '*manages adverse environmental effects*' responds to Objective 1 of the NPS-FM and UFD-P8 responds to Policy 3 of the NPS-FM by promoting resilient design methods in urban development, including water sensitive design and nature based solutions. To go further than this, would in my

opinion, go beyond the scope of PC3 and pre-empt the outcome of the separate freshwater planning process being undertaken by council, which will give effect to the NPS-FM and be supported by technical evidence.

196. Lastly, the s 32 report is clear that scope of this plan change is *“limited to what is required to give immediate effect to the NPS-UD and where there are other matters relating to urban growth (directly or indirectly) already addressed in the One Plan RPS provisions, these have been preserved pending further, substantive review”*. The PC3 provisions will be read alongside the operative One Plan provisions – they work together. This means the land use and water quality provisions included in Chapters 4 and 5 will still apply to urban development in the region, and the direction to maintain or enhance water quality is still relevant.

197. My recommendations in response to this submission are outlined below.

Summary of submission points relevant to maintenance and enhancement of the natural environment, including freshwater

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
UFD-I3 Submission point 5.1	Urban development policy which has the hierarchy of obligations of Te Mana o te Wai and the NPS-FM as core concepts will lead to ease of integrations and a focus on restorative development.	Amend to: Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure planning and funding decisions, manages the effects of growth, <b>and leads to improvements in</b> the urban and natural environment <b>including freshwater</b> , and improves resilience to the effects of climate change.		<b>Accept in part</b> I accept the need to recognise the need for urban development to not be enabled at the expense of the natural environment. However, the scope of PC3 is limited. I recommend UFD-I3 be amended as follows: Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure planning and funding decisions, <u>does not worsen</u> effects on the urban and natural environment ( <u>including freshwater</u> ), and improves resilience to the effects of climate change.
UFD-O1 (2) Submission point 5.2	To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions.	Amend to: New development, development infrastructure and additional infrastructure are provided in a coordinated, integrated, and efficient manner <b>which maintains or improves the natural environment including freshwater and increases resilience to climate change.</b>		<b>Reject</b> The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3. Additionally Horizons has commenced a separate review of the One Plan in response to the NPS-FM that addresses freshwater quality. In my view the matters raised

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
				in this submission point are more appropriately addressed though that process.
UFD-O3 (1) Submission point 5.3		Amend to: (e) manage adverse environmental effects <b><i>so impacted environments are improved and enhanced.</i></b>		<b>Reject</b> The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3. I am of the view that UFD-O3(1)(e) provides sufficient protection for environmental effects and aligns with the direction of the NPS-UD
UFD-P1 (2) Submission point 5.4		Amend to: Ensure there is coordination between the location, form, and timing of urban growth and the funding, delivery, and implementation of development structure <b><i>which helps improve the natural environment.</i></b>		<b>Reject</b> The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3.
UDF-P8 (1) Submission point 5.5	Storm water, flood protections, abstractions and water storage must be integrated with national policy including the hierarchy of obligations of Te Mana o te Wai, and to ease confusion this should be explicitly stated in the RPS UFD. Urban design	Amend to: Urban environments are developed in ways that reduce greenhouse gas emissions, improve resilience to the effects of climate change, and <b><i>reduce stress on and lead to</i></b>		<b>Reject</b> The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3. Urban development proposals will be subject to those provisions. I also consider it is premature to attempt to get

Provision number and submission point(s)	Summary of submission point(s)	Summary of relief sought	Further submission	Section 42A recommendations
	cannot be developed at the expense of freshwater ecosystems	<b><i>improvements in freshwater ecosystems and the natural environment.</i></b>  (c) requiring best practice resilience to the impacts of climate change, including sea level rise, and any increases in the scale and frequency of natural hazard events, <b>while giving effect to Te Mana o te Wai.</b>		ahead of Horizons' NPS-FM plan change by inserting references to elements of the NPS-FM.
UFD-PR3 Submission point 5.8	This phrase helps integrate urban development with the natural environment, and should be integrated throughout the RPS UFD:  <i>“Provisions in this chapter also seek to ensure urban development positively impacts the quality of urban environments, the quality of life for residents, and the quality of the natural environment.”</i>	This phrase should be emphasised throughout the Proposed Plan Change 3.		<b>Reject</b>  In my view, this concept is adequately addressed through the provisions in PC3 as well as the remainder of the One Plan.
UFD-AER4 Submission point 5.9	To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions.	Amend to:  Development infrastructure is in place in time to facilitate urban intensification or expansion <b><i>with no adverse environmental impacts caused, and remediation to existing damage where possible, including to freshwater quality and quantity.</i></b>		<b>Reject</b>  In my view, this concept is adequately addressed through the provisions in PC3 as well as the remainder of the One Plan.

### **Conclusion on submissions**

198. Taking into account the matters discussed above in response to submissions, I have recommended amendments to the PC3 provisions as notified. Those amendments are set out at **Appendix 1** in tracked change. A reference to the submission number is included as a footnote to each change.
199. A summary of all the points raised in submissions (including those discussed above), and my recommendations in respect of them, is set out at **Appendix 2**.

### **K. STATUTORY CONSIDERATIONS**

200. In summary, a change to a regional council's RPS must be prepared in accordance with:
- (a) The purpose of the RMA;<sup>8</sup>
  - (b) The regional council's functions under s 30 of the RMA;<sup>9</sup> and
  - (c) Certain national directions.<sup>10</sup>
201. The plan change's objectives must also be assessed in a s 32 report, to determine whether they are the most appropriate way to achieve the purpose of the RMA, and the other provisions of the plan change must be considered to determine whether they are the most appropriate way to achieve those objectives. The regional council must have particular regard to that report.<sup>11</sup>
202. The core of the statutory and planning assessment underlying PC3, setting out how the statutory obligations above have been met by PC3, is described in detail in the s 32 report.<sup>12</sup> I adopt that assessment.
203. However, while that assessment was up to date at the time of the s 32 report's publication, additional national direction has been released since the notification of

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<sup>8</sup> Resource Management Act 1991, ss 59 and 61(1)(b).

<sup>9</sup> Resource Management Act 1991, s 61(1)(a).

<sup>10</sup> Resource Management Act 1991, s 61(1)(da)–(e).

<sup>11</sup> Resource Management Act 1991, ss 32 and 61(1)(c)–(d).

<sup>12</sup> At section 3.

PC3. This requires further discussion of Horizons' statutory obligations, which I detail below.

204. Further analysis in the terms of s 32AA is also required, in respect of the changes recommended in this report. I deal with this at the end of this section.

#### **National Policy Statement for Highly Productive Land 2022 (NPS-HPL)**

205. The NPS-HPL was gazetted on 19 September 2022 and came into force on 17 October 2022 (the day PC3 was notified).

206. A number of the submissions outlined above discuss the matters relevant to PC3 which are raised by the NPS-HPL, as discussed under Topic 3 above.

207. I consider that the recommended amendments to the PC3 provisions in response to submissions, and the further amendments discussed directly above, give effect to the NPS-HPL, to the extent that Horizons has scope to do so as part of this process.

#### **National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB)**

208. The NPS-IB was gazetted on 31 May 2023 and came into force on 4 August 2023.

209. The NPS-IB responds to biodiversity decline by providing direction to Councils to protect, maintaining and restore indigenous biodiversity. It seeks to require, as a minimum, no further reduction in indigenous biodiversity nationally. The NPS-IB also seeks to clarify the roles and responsibilities of TAs and regional councils in relation to protection of indigenous biodiversity. The NPS-IB includes a number of provisions associated with subdivision and development in significant natural areas (SNAs) as well as outside these areas where indigenous biodiversity is present. Under the NPS-IB territorial authorities are required to notify a plan or plan change to include SNAs. The Regional Council is also required to prepare regional biodiversity strategies and notify a plan or plan change to give effect to the NPS-IB.

210. In the context of PC3, there is some acknowledgement of the need to protect the environment from urban development. This is addressed in:

(a) UFD-O1(e) manage adverse environmental effects;

(b) UFD-P4(e): it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.

211. The One Plan also includes a number of provisions associated with protecting indigenous biodiversity and landscapes in Chapters 6 and 13. Due to the integrated nature of the One Plan, these provisions apply to urban development.

212. In my view there are some fairly significant district and regional plan reviews that will need to be undertaken in response to the NPS-IB. It would be premature to try and give effect to the NPS-IB through PC3 ahead of the work required by Horizons and the TAs under this NPS. In addition, due to the NPS-IB being gazetted and coming into effect well after notification of PC3, I believe there is no scope for wholesale changes to attempt to give effect to the NPS-IB.

213. I consider that the recommended amendments to the PC3 provisions in response to submissions, and the further amendments discussed directly above, give effect to the NPS-IB, to the extent that Horizons has scope to do so as part of this process.

#### **National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023 (NPS-IPH)**

214. The NPS-IPH was gazetted on 26 June 2023 and came into force on 27 July 2023. It applies to emissions of greenhouse gases from fossil fuel-fired devices producing heat for industrial processes or for indoor plant growing. I do not consider that its provisions are relevant to PC3, which does not directly regulate those activities.

#### **Section 32AA**

215. The Act requires that changes to PC3 following the preparation of the initial s 32 report must be subject to a further evaluation in similar terms, at a level of detail that corresponds to the scale and significance of the changes.<sup>13</sup>

216. The majority of changes I have recommended are minor changes to aid in the interpretations of the Plan, such as new wording in the scope and background, better aligning with other documents or processes, and fixing typos. These changes improve

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<sup>13</sup> Resource Management Act 1991, s 32AA.



the efficiency and effectiveness of the Plan. Given the minor nature of these changes, I have not assessed them individually in terms of s 32AA.

217. However, there were some more significant changes recommended in response to matters discussed at the five pre-hearing meetings. I have undertaken an assessment of the options below.
218. **Topic 1 Infrastructure:** Submitters sought changes to the provisions to recognise and protect against reverse sensitivity effects from urban development on infrastructure of national significance. Through this, submitters also sought for PC3 to include the NPS-UD definition of nationally significant infrastructure. Changes have been recommended to amend the scope and background, UFD-I1, UFD-I3, UFD-O3, and UFD-P4 to provide for reverse sensitivity on nationally significant infrastructure. It is also recommended that the NPS-UD definition of for 'Nationally Significant Infrastructure' be included in PC3.
219. Through this topic, the matter of public transport and its associated infrastructure was also addressed. Submitters requested amendments to provisions to ensure lack infrastructure such as public transport services which are not under the control of territorial authorities did not restrict progress of urban development planning processes. The focus of the request was around ensuring the development or growth area enables public transport. This request is considered reasonable, and amendments have been recommended to UFD-O3, UFD-P1(2), UFD-P4 and UFD-P6(e).

<b>Topic 1: Infrastructure</b>	
<b>Option 1: no change to notified provisions</b>	<b>Option 2: incorporate changes</b>
<p><u>Efficiency &amp; effectiveness</u></p> <p>The NPS-UD provisions relating to nationally significant infrastructure have effect regardless of the RPS. In addition, there are provisions in Chapter 3 of the One Plan which seek to protect regionally and nationally important infrastructure from reverse sensitivity effects from urban development, however the infrastructure listed as regionally or nationally important in the One Plan does not adequately encompass the full NPS-UD definition of nationally significant infrastructure.</p> <p><u>Risk of acting or not acting</u></p> <p>If retained as notified, there is potential confusion for plan users, with nationally significant infrastructure at risk of reverse sensitivity effects from development (worst case scenario) or planning processes delayed while reverse sensitivity effects are addressed.</p> <p>For public transport services and infrastructure, the risk of continuing with the notified provisions is that development is delayed while regional council planning for public transport is undertaken. This would be inefficient as the transport planning element would require a level of certainty about the development area (e.g. road layout and design, housing numbers and demographics) before it could progress to a stage to receive funding at the local and central government level to implement.</p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The Horizons One Plan must give effect to national policy statements. The NPS-UD includes a definition for nationally significant infrastructure. In addition the National Policy Statement on Electricity Transmission seeks to protect nationally significant infrastructure from reverse sensitivity effects and ensure ongoing maintenance, repair and upgrades are enabled. The recommended changes will ensure these two NPSs are given effect to by the One Plan via PC3.</p> <p>The changes I have recommended through this report reflect agreements reached at pre-hearing meeting and recognise that the NPS-UD and NPS-ET terminology takes precedent. The changes will remove the inconsistency between PC3 and these higher order documents while providing better certainty to Plan users.</p> <p><u>Risk of acting or not acting</u></p> <p>The risk of not acting would be delayed planning processes, costing time and money and resulting in less housing availability in urban areas. By implementing the recommended amendments, the above risks are less likely to occur.</p> <p>The recommended amendments do introduce consideration of reverse sensitivity on nationally significant infrastructure. This could result in a cost</p>

Appropriateness

In my view, retaining the notified provisions is not the appropriate course of action, and to do so would potentially result in reverse sensitivity effects on nationally significant infrastructure and delays in the planning process, which in turn would affect housing availability in urban environments. In my view this does not give effect to the intent of the NPS-UD.

Retaining the notified wording would not achieve the relief sought by submitters on this topic. There were no submitters who expressly requested the current provisions remain as notified. One further submitter (NZ Defence Force) did seek that cross-reference to existing policies 3-1 and 3-3 be inserted to ensure defence force infrastructure be protected from reverse sensitivity.

associated with development around these areas which will need to consider how reverse sensitivity effects can be minimised. However, there will be social benefits in managing the potential reverse sensitivity effects that can arise from intensification around nationally significant infrastructure through maintaining amenity and infrastructure operation.

I recognise that the proposed amendments may lead to social and environmental costs where development is enabled that is not immediately supported by the required public transport infrastructure however this cost is mitigated through enablement of its establishment to occur and will likely improve transport planning responsiveness.

Appropriateness

The changes recommended to the scope and background, UFD-I1, UFD-I3, UFD-O3, and UFD-P4, are in my opinion, the best way to ensure reverse sensitivity effects from urban development on nationally significant infrastructure are avoided, while also still aligning with existing One Plan policies relating to regionally and nationally important infrastructure. In my view the changes will provide certainty and minimise misinterpretation of the PC3 provisions where nationally significant infrastructure is concerned.

The changes recommended UFD-O3, UFD-P1(2), UFD-P4 and UFD-P6(e) will ensure that urban development is able to progress even if transport planning for public transport hasn't been finalised. Given public transport planning (via regional councils) follows a different legislative and funding process (under the Land Transport Management Act), and often relies on demand based evidence to justify the service, PC3 needs to reconcile and provide for this difference without affecting progress of urban growth planning. In my

	<p>opinion, the recommended amendments are the most appropriate way to achieve this through PC3. The recommended amendments improve clarity for plan users but will continue to seek to achieve that urban development is supported by the appropriate infrastructure, but in a more effective way than the notified policy as it does not restrict development from occurring before infrastructure has been delivered. This will help achieve well-functioning urban environments and will result in associated social, economic, and environmental benefits of enabling development. The recommended amendments will continue to provide for the integration of development and the transport network and nationally significant infrastructure as a relevant consideration which will be effective in achieving well-functioning urban environments and give effect to Objective 1 and Objective 3 of the NPS-UD.</p> <p>The changes reflect those sought by submitters on this topic and agreements reached at pre-hearing. One further submitter (NZ Defence Force) did seek that cross-reference to existing policies 3-1 and 3-3 be inserted to ensure defence force infrastructure be protected from reverse sensitivity. I am satisfied that the existing One Plan provisions will function as they do currently, and defence force infrastructure will continue to be protected from reverse sensitivity effects by those existing provisions.</p>
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Table 10: Topic 1 Infrastructure S32AA analysis



220. **Topic 2 Territorial Authority matters:** Submitters sought changes to the provisions to improve clarity around roles and responsibilities and to ensure PC3 does not encroach into district plan territory. All changes recommend are minor in nature and aim to improve the interpretation and clarity of PC3 for plan users (particularly territorial authorities). This topic was discussed at pre-hearing and the recommended changes have largely resulted from agreements reached at the pre-hearing meeting.
221. I recommend amendments to the scope and background, UFD-O3, UFD-O4, UFD-P1, UFD-P4, UFD-P5, UFD-P6, UFD-P7(2)(b) and Method 2 as a result of the matters raised under the topic 'territorial authority matters'.

<b>Topic 2: Territorial Authority matters</b>	
<b>Option 1: no change to notified provisions</b>	<b>Option 2: incorporate changes</b>
<p><u>Efficiency &amp; effectiveness</u></p> <p>A number of the recommended changes proposed are minor in nature and seek to improve the interpretation of PC3 for plan users.</p> <p>The notified provisions lack certainty in some areas which could lead to confusion and misinterpretation by users. This could create inefficiencies for urban development projects and result in district plans not appropriately giving effect to PC3.</p> <p><u>Risk of acting or not acting</u></p> <p>If no changes are made to the notified provisions of PC3, plan users, particularly territorial authorities may not interpret the provisions correctly, resulting in district plans and urban development which doesn't give effect to the RPS and thereby not meeting the requirements of the NPS-UD. This would also be contrary to a number of the agreements reached through prehearing on this topic.</p> <p><u>Appropriateness</u></p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The recommended amendments are effective at providing additional detail on the matters which affect territorial authority planning and provide clarity for plan users. In my view they will improve both the effectiveness and efficiency of the Plan as a higher order document to district plans by providing certainty and clarity.</p> <p><u>Risk of acting or not acting</u></p> <p>The changes made are generally very minor in nature and do not change the purpose or intent of the provisions. The risk of not accepting these changes is uncertainty and misinterpretation at a district level causing inefficiencies, additional costs and delays in urban development. The flow on effect of this will be lack of development in urban areas, which will have social and economic effects.</p> <p><u>Appropriateness</u></p> <p>The changes reflect those sought by submitters on this topic and agreements reached at pre-hearing.</p>

<p>In my opinion, the notified PC3 provisions lack certainty in places, as evidenced by the number of submission points raised which touched on territorial authority related matters.</p> <p>Retaining the notified provisions is not, in my view, the most appropriate way to give effect to the NPS-UD.</p>	<p>The recommended amendments to the scope and background, UFD-O3, UFD-O4, UFD-P1, UFD-P4, UFD-P5, UFD-P6, UFD-P7(2)(b) and Method 2 are, in my opinion, the most appropriate way to achieve the clarity submitters are seeking, while retaining the intent and scope of PC3.</p>
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*Table 11: Topic 2 Territorial Authority matters S32AA analysis*



222. **Topic 3: Highly Productive Land:** Changes have been recommended to the scope and background, UFD-I2, UFD-O2, UFD-P3, UFD-PR2 and UFD-AER2 to replace all references to versatile soils with highly productive land. Inclusion of the NPS-HPL definition for highly productive land in PC3 is also recommended. The basis of these changes is to ensure consistency with the NPS-HPL, within the level of scope available.

Topic 3: Consistency with the NPS-HPL	
Option 1: no change from notified provisions	Option 2: incorporate changes
<p><u>Efficiency &amp; effectiveness</u></p> <p>The NPS-HPL requires that mapping of highly productive land be inserted in the One Plan RPS through a Schedule 1 process. Horizons has three years from the commencement date of the NPS-HPL to notify that plan change. This can also include changes to provisions to align the RPS with the NPS-HPL.</p> <p>One option is to make <b>no</b> changes to the Horizons RPS through PC3 and wait for the NPS-HPL plan change (to be undertaken separately).</p> <p>The current approach of protecting soils in the Horizons RPS is based around the term ‘versatile soils’ which differs from the NPS-HPL definition of ‘highly productive land’. The NPS-HPL broadens the scope of what needs to be protected as highly productive land, covering all Class 1, 2 and 3 land not identified for urban development. The RPS provision of versatile soils incorporates class 1 and 2 soils only.</p> <p>PC3 retains the provisions associated with versatile soils (UFD-I2, UFD-O2, UFD-P3, UFD-PR2, UFD-AER2). The NPS-HPL is a higher order document with directive provisions which are already in effect and apply to highly productive land regardless of what is in the RPS.</p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The Horizons One Plan must give effect to national policy statements. The NPS-HPL commenced the same day PC 3 was notified, meaning it had not been considered in the preparation of the notified plan.</p> <p>The NPS-HPL is relevant to the PC3 as it is intended to work together with the NPS-UD. It also includes exceptions to its “avoid” policy (Policy 5) to allow for growth where there is evidence as prepared under the NPS-UD to support the necessity of rezoning land for urban development. The NPS-HPL deliberately uses the same terminology as the NPS-UD to ensure consistency in their implementation.</p> <p>There are provisions in PC3 which apply to versatile soils and have been pulled through from Chapter 3 of the current RPS. These provisions require consideration of how versatile soils will be managed in relation to growth. The term versatile soils does not have its own definition in the One Plan, rather it is defined within the provisions as being Class 1 and 2 soils.</p> <p>The versatile soils terminology used in PC3 creates conflict with the NPS-HPL and is likely to create uncertainty and inconsistency in how the criteria are applied.</p>

<p><u>Risk of acting or not acting</u></p> <p>If no changes are made to PC3, the One Plan will continue to rely on the terminology of versatile soils which is inconsistent with the NPS-HPL. This has potential to cause confusion as to how the provisions of PC3 should be applied to growth management. Particularly in areas where versatile soils and highly productive land overlap and undermine confidence in the One Plan as it is out of date and conflicts with the NPS-HPL.</p> <p><u>Appropriateness</u></p> <p>There were no submitters who requested the current versatile soils provisions remain as notified. Of the six submitters and one further submitter who submitted on this topic, all were supportive of including minor changes to ensure alignment with the NPS-HPL terminology.</p>	<p>The changes I have recommended through this report align with the agreements reached at the pre-hearing meeting for this topic and recognise that the NPS-HPL terminology takes precedent. The changes will remove the inconsistency between PC3 and the NPS-HPL and provide better certainty to Plan users.</p> <p><u>Risk of acting or not acting</u></p> <p>Five submissions and one further submission were made to the notified PC3 requesting changes be made to reflect the NPS-HPL. No submitters opposed this approach. I consider that changes to the provisions are appropriate, however, the Panel will need to determine whether they consider there is scope to make these changes. This will be covered in more detail in legal submissions.</p> <p><u>Appropriateness</u></p> <p>All submitters and further submitters on this topic supported making changes to PC3 to recognise the NPS-HPL.</p>
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Table 12: Topic 3 NPS-HPL consistency S32AA

223. **Topic 4 Active and Public transport:** Submitters made various points relating to provision of public and active transport as part of urban development and intensification through PC3. For some submitters there was the desire to ensure a variety of transport modes are provided for in urban development. Other submitters expressed concern that the wording of PC3 created a risk that urban development could be constrained by lack of public transport (both planned and/or delivered) given this is the responsibility of regional council, and follows a different planning and funding process under the Land Transport Management Act. Submitters sought to ensure that the wording of PC3 does not prevent future development options due to the absence of existing or planned public transport.
224. Following the pre-hearing meeting on this topic, I have recommended amendments to UFD-O3, UFD-P4 and UFD-P8 which largely reflect the agreements reached at pre-hearing.

<b>Topic 4: Active and Public transport</b>	
<b>Option 1: no change</b>	<b>Option 2: incorporate changes</b>
<p><u>Efficiency &amp; effectiveness</u></p> <p>A number of the recommended changes proposed are minor in nature and seek to improve the interpretation of PC3 for plan users around provision of public transport infrastructure (planned or otherwise).</p> <p>The notified provisions rely on planned public transport being available for urban intensification and expansion. Given territorial authorities are not responsible for planning and implementation of public transport, this requirement may result in unintended delays to urban development and growth.</p> <p><u>Risk of acting or not acting</u></p> <p>If no changes are made to the notified provisions of PC3, urban intensification and expansion may be unduly delayed due to the lack of planned public transport by the regional council. From the regional council's perspective, planning of public transport is usually reactive and needs to have some certainty around street design and layout as well as projected demand before a potential service can be planned and funding sought.</p> <p>In my view, there are potentially social and economic effects associated with keeping the notified provisions as urban development and expansion</p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The recommended amendments are largely minor in nature. They do not propose wholesale changes to any provisions but seek to improve the interpretation and clarity around public transport requirements for urban development and expansion.</p> <p><u>Risk of acting or not acting</u></p> <p>The recommended amendments improve clarity for plan users but will continue to seek to achieve that urban development is supported by the appropriate infrastructure, but in a more effective way than the notified policy as it does not restrict development from occurring before infrastructure has been delivered. This will help achieve well-functioning urban environments and the intent of the NPS-UD.</p> <p><u>Appropriateness</u></p> <p>In my opinion, the recommended amendments are the most appropriate way to achieve this through PC3. The recommended amendments improve clarity for plan users but will continue to seek to achieve that urban development will be supported by the appropriate infrastructure, but in a more effective way than the notified policy as it does not restrict</p>

<p>(particularly in new areas not serviced by any public transport) may be delayed while public transport planning occurs.</p> <p><u>Appropriateness</u></p> <p>Retaining the notified provisions would not achieve the relief sought by submitters</p>	<p>development from occurring before infrastructure has been delivered. This will help achieve well-functioning urban environments and will result in associated social, economic, and environmental benefits of enabling development.</p> <p>The changes reflect those sought by submitters on this topic and agreements reached at pre-hearing.</p>
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*Table 13: Topic 4 Public and active transport S32AA*

225. **Topic 5 Climate change and adaptation:** A number of submitters raised points seeking to understand and ensure climate change adaptation through PC3 is achievable. The key concerns revolved around ensuring development supports reductions in greenhouse gas emissions – acknowledging that urban development will result in increases during construction. The second matter raised revolved around uncertainty associated with the term ‘best practice’ in relation to resilience. These matters were discussed through pre-hearing meetings, with only UFD-P8 proposed to be amended through the agreements reached on this topic.

<b>Topic 5: Climate change adaptation</b>	
<b>Option 1: no change</b>	<b>Option 2: incorporate changes</b>
<p><u>Efficiency &amp; effectiveness</u></p> <p>The NPS-UD requires urban environments to support reductions in greenhouse gas emissions and to be resilient to the impacts of climate change.</p> <p>The notified provisions of PC3 seek to achieve this requirement but submitters have raised concerns around interpretation.</p> <p><u>Risk of acting or not acting</u></p> <p>The notified provisions create uncertainty on two fronts. The first being potential misinterpretation surrounding greenhouse gas emissions from development and the second being uncertainty around what is required to achieve ‘best practice resilience’ to the effects of climate change.</p> <p>The NPS-UD requires development to ‘support’ reductions in greenhouse emissions. The notified wording does not reflect this terminology.</p> <p>The notified provisions, in my opinion do not achieve the direction of the NPS-UD in relation to greenhouse gas emissions and climate change.</p> <p><u>Appropriateness</u></p>	<p><u>Efficiency &amp; effectiveness</u></p> <p>The recommended amendments to UFD-P8 will provide clarity to plan users but will continue to seek to achieve that urban development is resilient and supports reductions in greenhouse gas emissions as required by the NPS-UD.</p> <p>In my opinion, this is the most effective way to give effect to the requirements of the NPS-UD, specifically the provision of well-functioning urban environments defined in Policy 1.</p> <p><u>Risk of acting or not acting</u></p> <p>I do not consider that the proposed amendments will result in additional costs as the amendments are including matters which are already directed through the NPS-UD.</p> <p>The risk of not acting is that development is subject to ‘best practice’ resilience controls for which council has not defined, and goes beyond the requirements of the NPS-UD. This may cause uncertainty and delays as plan users establish what is ‘best practice resilience’ for each development.</p> <p><u>Appropriateness</u></p>



<p>Submissions supported urban environments being resilient to climate change and reducing greenhouse gas emissions.</p> <p>The changes sought by submitters to make the provisions clearer were discussed at pre-hearing and retaining the notified wording would not meet the agreements reached.</p> <p>I do not consider the notified wording of UFD-P8 to be the most appropriate way of giving effect to the NPS-UD.</p>	<p>The recommended changes will seek development that is resilient to climate change impacts which will ensure that well-functioning urban environments are achieved, with associated social, cultural and environmental benefits.</p>
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*Table 14: Topic 5 Climate Change adaptation S32AA*

**L. OVERALL CONCLUSIONS**

226. The One Plan must be amended to give effect to the NPS-UD, in line with Horizons' statutory obligations.
227. In my view, the provisions (as amended in response to submissions and set out in **Appendix 1**):
- (a) Give effect to the NPS-UD in the Manawatū-Whanganui Region;
  - (b) Comply with Horizons' broader statutory obligations; and
  - (c) Are in accordance with Part 2 of the Act; and
  - (d) Are the most appropriate way to achieve the purpose of the Act (in relation to the objectives), and the most appropriate way to achieve the objectives of both PC3 and the operative One Plan (in relation to all other provisions).
228. Accordingly, I recommend that the Hearing Panel:
- (a) Approve PC3, with the recommended amendments in response to submissions, as set out in **Appendix 1**; and
  - (b) Accept, accept in part, or reject submissions in accordance with the recommendations set out in **Appendix 2**.

**Leana Shirley**

1 December 2023

**M. APPENDICES**

**Appendix 1:** Recommended amendments to the PC3 provisions as notified

**Appendix 2:** Summary of submissions and further submissions on PC3 and reporting officer recommendations



# **Urban Development Plan Change**

**S42A Redrafted provisions based on submissions and pre-hearing agreements**

**Base document = Proposed provisions for public notification – October 2022**

Key

One Plan wording to be retained	Black
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Notified changes	Purple
S42A recommended changes – new text	<u>Blue text underlined</u>
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## RPS – UFD – Urban form and development Te tāone me te whakawhanaketanga

### Scope and Background

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

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

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

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

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

Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto highly productive land\* ~~the more versatile soils~~ almost always may result in a reduction of reduces<sup>3</sup> options for their future productive use.

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

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

<sup>3</sup> Submission point 13.1

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Such reduction in options ~~This may~~ adversely affect<sup>4</sup> the ability of future generations to meet their reasonably foreseeable needs.

## Issues

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

Urban growth that is not strategically ~~poorly~~ planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, *development infrastructure<sup>\*</sup>* and ~~associated~~ *additional infrastructure<sup>\*</sup>*. It can also have the potential to create reverse sensitivity effects<sup>4</sup>. This does not contribute to a *well-functioning urban environment<sup>\*</sup>*, can create adverse environmental *effects<sup>\*</sup>* and will make it more difficult for urban development to meet the needs of current and future communities.

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

Urban growth and rural residential *subdivision<sup>\*</sup>* (“lifestyle blocks”), on highly productive land<sup>\*</sup> versatile soils may almost always results in a reduction of the productive capacity of that land<sup>6</sup> these soils no longer being available for use as production land. These development pressures often occur on the fringes of some of the Region's urban areas, most notably Palmerston North.

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

A growing population increases demand for housing, *business land<sup>\*</sup>*, *infrastructure<sup>^</sup>* and *community services<sup>\*</sup>*. Growth in urban environments<sup>7</sup> needs to be provided for in a way that contributes to *well-functioning urban environments<sup>\*</sup>*, is integrated with *infrastructure<sup>^</sup>* planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance<sup>8</sup>, does not worsen<sup>9</sup> manages effects<sup>\*</sup> on the urban and natural environment (including freshwater)<sup>10</sup>, and improves resilience to the *effects<sup>\*</sup>* of *climate change<sup>^</sup>*.

## Objectives

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

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

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

<sup>6</sup> Submission point 13.2

<sup>7</sup> Submission point 12.5

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

<sup>9</sup> Submission point 5.1

<sup>10</sup> Submission point 5.1



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

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

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

Mā te mahere rautaki me te whakawhanake tāone:

- (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<sup>\*12</sup>**

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

**UFD-O2: 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

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

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

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

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

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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 land<sup>15</sup> ~~capacity and housing choice~~,
  - (c) achieve a quality, sustainable and compact urban form ~~that relates well to its surrounding environment~~<sup>16</sup>,
  - (d) are, or planned to be,<sup>17</sup> well connected by a choice of transport modes including *public transport*\*, ~~and~~
  - (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 importance<sup>18</sup>.
- (2) enable more people to live in, and more businesses and *community services*\* to be located in, areas of an *urban environment*\* where:
  - (a) it is in or near a *centre zone*\* or other area with many employment opportunities, ~~or~~<sup>19</sup>
  - (b) it is able to be, or is,<sup>20</sup> well-serviced by existing or planned *public transport*\* and active transport<sup>21</sup>, ~~or~~
  - (c) there is a high demand for housing or *business land*\*, relative to other areas within that *urban environment*\*.

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

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

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

<sup>15</sup> Submission point 14.1

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

<sup>17</sup> Submission point 7.5

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

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

<sup>20</sup> Submission point 7.5

<sup>21</sup> Submission point 19.2

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

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(a) e whai wāhi ana ngā tāngata katoa, hapori mai, whakatipuranga mai kia pai tō rātou oranga ā-ōhanga, ā-ahurea, tō rātou hauora me te haumaruru i āianeī, 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 tūkinu.

(2) e taea ai e te tangata te noho, ngā pakihī 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 pakihī 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)<sup>^</sup>

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

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

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*<sup>^</sup>

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

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

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

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

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

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

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

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

*Sufficient development capacity\** and *land\** supply is provided for in the *short term\**, *medium term\** and *long term\** to accommodate demand for housing and *business land\** in *urban environments\** by:

- (1) providing for urban intensification and urban expansion within *district plans^* in accordance with UFD-P1, UFD-P4, and UFD-P5,
- (2) *local authorities^* being responsive to unanticipated or out of sequence plan changes that would add significantly to *development capacity\** and contribute to *well-functioning urban environments\** in accordance with UFD-P6, and
- (3) ensuring the urban intensification and expansion necessary to meet the *housing bottom lines\** specified in Table X<sup>30</sup> is provided for in the Palmerston North District Plan.

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

<b><i>Housing bottom lines*</i> (number of dwellings)</b>	
Short- to medium-term July 2021 – June 2031	Long-term July 2031 – June 2051

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

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

<sup>28</sup> Submission point 10.3

<sup>29</sup> Submission point 11.3

<sup>30</sup> 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.

Key

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Includes an additional margin of 20%	Includes an additional margin of 15%
5,0465 <sup>34</sup>	7,925

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

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

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

- (1) Intensification and expansion of *urban environments*\* is provided for and enabled in *district plans*<sup>^</sup> where:
- (a) it contributes to a *well-functioning urban environment*<sup>\*</sup>,
  - (b) it provides for a range of residential and business<sup>33</sup> areas that enable different housing and business types, *site*<sup>\*</sup> size and densities ~~that relate well to the surrounding environment~~<sup>34</sup>,
  - (c) higher density development is in close proximity to *centre zones*<sup>\*</sup>, *public transport*<sup>\*</sup>, *community services*<sup>\*</sup>, employment opportunities, and open space,
  - (d) development is well serviced by existing or planned *development infrastructure*<sup>\*</sup> and enables provision of<sup>35</sup> *public transport*<sup>\*</sup>, and *additional infrastructure*<sup>\*</sup> required to service the *development capacity*<sup>\*</sup> 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<sup>\*</sup> is not compromised<sup>36</sup>.
- (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,

<sup>31</sup> Submission point 11.4

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

<sup>33</sup> Submission point 14.2

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

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

<sup>36</sup> Submission point 1.2

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- (c) is well-connected ~~along~~ by a variety of transport modes and<sup>37</sup> transport corridors,
- (d) manages adverse reverse sensitivity *effects*\* on land with existing incompatible activities, including<sup>38</sup> adjacent to the *urban environment*\* boundary, and
- (e) does not compromise the operation, maintenance and upgrade of nationally significant infrastructure<sup>39</sup>.
- (3) *District plans*<sup>^</sup> applying to *urban environments*\* must enable heights and density of urban form which are ~~equal to~~ commensurate with<sup>40</sup> the greater of:
- (a) demonstrated relative<sup>41</sup> demand for housing and/or business use in that location<sup>42</sup>, or
- (b) the level of accessibility provided by existing or *planned*\* *active transport*\* or *public transport*\* to areas with *community services*\* and employment opportunities.
- (4) Local authority transport plans and strategies must establish ways to contribute to *well-functioning urban environments*\* through the provision of *public transport*\* services and by enabling *active transport*\*, including its associated infrastructure<sup>43</sup>.

### UFD-P5: Built forms

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

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

<sup>37</sup> Submission point 2.9

<sup>38</sup> Submission point 4.9

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

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

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

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

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

<sup>44</sup> Submission point 10.8

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(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 development<sup>45</sup>**

- (1) Unanticipated or out of sequence development will add significantly to *development capacity*\* where:
- (a) the location, design and layout of the development will contribute to a *well-functioning urban environment*\*,
  - (b) the development is well-connected along by a variety of transport modes and<sup>46</sup>, transport corridors, and to *community services*\*, and open space,
  - (c) the development will significantly contribute to meeting demand for additional urban land identified in a *Housing and Business Development Capacity Assessment*\*, or a shortfall identified by undertaking the monitoring requirements outlined in the National Policy Statement on Urban Development 2020, including meeting *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 to <sup>47</sup>upgraded development infrastructure\* to support development of the *land*\* without adverse *effects*\* on the provision or capacity of other planned *development infrastructure*\* including planned *infrastructure*\* expenditure, and
  - (f) the development avoids adverse *effects*\* on *infrastructure*<sup>^</sup> and other physical resources of regional or national importance ~~as far as reasonably practicable<sup>48</sup>~~.
- (2) If the above criteria are met, the Regional Council and *Territorial Authorities*\* must have particular regard to the contribution the development will have towards achieving UFD-P2.

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

- (1) Ensure *planning decisions*\* involving *urban environments*\* provide for *Treaty of Waitangi (Te Tiriti o Waitangi)*<sup>^</sup> principles by enabling hapū and iwi involvement in urban development planning processes, including in decision making where appropriate, to ensure provision is made for their

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

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

<sup>47</sup> Submission point 7.10

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

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needs, aspirations, and values, to ensure *urban environments*\* enable Māori to express their cultural traditions and norms.

- (2) *Land*\* use strategies must be proactively developed and implemented to manage urban development in a manner which:
- (a) has regard to resource management issues of concern to *hapū*\* and *iwi*\*, including those identified in any relevant *iwi management plan*\*,
  - (b) enables papakāinga housing and marae ~~on Māori-owned land~~<sup>49</sup>,
  - (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*<sup>^</sup>

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

- (a) use of urban design, building form and *infrastructure*<sup>^</sup> to minimise the contribution to *climate change*<sup>^</sup> of the development and its future use, including (but not limited to) *energy efficiency*\* (including methods to ensure whole-of-life *energy efficiency*\*), *water*\* efficiency, *waste*\* minimisation, transportation modes (including use of *public transport*\* and *active transport*\*) water-sensitive design and nature-based solutions,
- (b) urban development being compact, well designed and sustainable, and
- (c) requiring best practice<sup>51</sup> resilience to, the impacts of *climate change*<sup>^</sup>, 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 are<sup>52</sup>~~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.

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

<sup>50</sup> Submission point 11.6

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

<sup>52</sup> Submission point 13.6



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## Methods

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

Method 1	Monitoring and reporting
Description	<p>The aim of this method is to collect information on development and <i>infrastructure</i><sup>^</sup> trends, needs and pressures in the Region, so that these trends and pressures can be responded to appropriately and in a timely manner, through management of the built environment.</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, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council (with the Wellington Regional Leadership Committee)</u><sup>53</sup> to jointly prepare and publish <i>Housing and Business Development Capacity Assessments</i>* and <i>Future Development Strategies</i>*.</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"> <li>Information collected on development and <i>infrastructure</i><sup>^</sup> trends and pressures in the Region.</li> <li>Monitoring and reporting undertaken that meets the requirements of the NPS UD.</li> </ul>

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><sup>54</sup>, will determine housing <i>development capacity</i>* that is <i>feasible</i>* and likely to be taken up in <i>short term</i>*, <i>medium term</i>*, and <i>long term</i>* through <i>Housing and Business Development Capacity Assessments</i>*. In addition, the Regional Council, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council (through the Wellington Regional Leadership Committee)</u><sup>55</sup> will jointly prepare <i>Future Development Strategies</i>*.</p> <p>Other <i>Territorial Authorities</i>*, together with the Regional Council, will undertake strategic planning to meet the objectives and policies of this</p>

<sup>53</sup> Submission point 17.7

<sup>54</sup> Submission point 17.8

<sup>55</sup> Submission point 17.8

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	<p>Chapter through similar, but appropriately scaled approaches. This includes the use of structure plans for greenfield residential developments.</p> <p>These strategies will enable decision-making to be based on sufficient information to:</p> <p>(a) coordinate the intensification of <i>urban environments</i>* and the development of extensions to <i>urban environments</i>* with <u>regional council and territorial authority</u><sup>56</sup> <i>infrastructure</i><sup>^</sup> planning,</p> <p>(b) provide the required <i>development infrastructure</i>* in an integrated, timely, efficient and effective way,</p> <p>(c) identify and manage impacts on key values and resources identified by this RPS, and</p> <p>(d) ensure greenfield development is supported by sound evidence (e.g. due to lack of infill capacity, climate change adaption).</p> <p>The above may involve the preparation of spatial plans as a method for applying an integrated strategic planning approach.</p> <p>Methods to achieve <i>active transport</i>* and <i>public transport</i>* strategic outcomes will include providing <i>public transport</i>* services, increasing accessibility via <i>active transport</i>* and micro-mobility devices such as e-bikes and e-scooters, and by implementing the Regional Public Transport Plan.</p> <p>Methods to achieve <i>climate change</i><sup>^</sup> strategic outcomes will include having regard to targets set in the New Zealand Emissions Reduction Plan in decision-making.</p> <p>The Regional Council and <i>Territorial Authorities</i>* will engage with hapū and iwi when undertaking strategic planning to meet the objectives and policies of this Chapter, including to ensure <i>urban environments</i>* enable Māori to express their cultural traditions and norms.</p>
Who	Regional Council and <i>Territorial Authorities</i> *
Links to Policy	This method implements UFD-P1 to UFD-P8.
Target	<ul style="list-style-type: none"> <li>• Urban development strategic planning documents prepared.</li> <li>• Requirements of the NPS UD met.</li> </ul>

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

<sup>56</sup> Submission point 11.3  
AS-030235-422-92-V1-e

Key

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

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

## Principal Reasons

### 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*<sup>^</sup> provision, and the retention of versatile soils for use as production land. Objective UFD-O1 and Policy UFD-P1 set~~

<sup>57</sup> Submission point 17.9  
AS-030235-422-92-V1-e

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up an overarching framework for ensuring urban development occurs in a strategically planned manner. Proactively developing and implementing appropriate *land*<sup>^</sup> use strategies to enable urban growth and manage its *effects*<sup>\*</sup> will ensure the efficient and effective provision of *development infrastructure*<sup>\*</sup> and *additional infrastructure*<sup>\*</sup>, and contribute to the objectives of the National Policy Statement on Urban Development 2020.

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

The RMA requires those with functions under it to have regard to resource costs and benefits of development. For example, directing urban growth and rural residential *subdivision*<sup>\*</sup> away from highly productive land<sup>\*</sup> ~~onto less versatile soils~~ may increase travel distances, costs of service provision or other economic or environmental costs of *land*<sup>\*</sup> development. However, allowing urban expansion onto highly productive land<sup>\*</sup> ~~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*<sup>\*</sup> to be used for productive use. *Territorial Authorities*<sup>\*</sup> need to weigh all relevant matters when making *land*<sup>\*</sup> 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*<sup>\*</sup> and improvements to the responsiveness and competitiveness of *land*<sup>\*</sup> and development markets. Provisions in this chapter also seek to ensure urban development positively impacts the quality of *urban environments*<sup>\*</sup>, 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
<b>UFD-AER1:</b> Urban growth occurs in a strategically planned manner.	UFD-P1	<ul style="list-style-type: none"> <li>Urban growth</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>
<b>UFD-AER2:</b> <u>Highly productive land</u> <sup>* 59</sup> <del>is Class 1 and 11 versatile soils are</del> retained, where appropriate for productive use.	UFD-P3	<ul style="list-style-type: none"> <li>Urban growth and rural residential <i>subdivision</i><sup>*</sup></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>

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

<sup>59</sup> Submission points 7.7, 10.2, 12.20

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Anticipated Environmental Result	Link to Policy	Indicator	Data Source
<b>UFD-AER3:</b> Urban intensification is achieved.	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	<ul style="list-style-type: none"> <li>Urban intensification</li> <li><i>Housing bottom lines*</i> achieved</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> <li>NPS UD monitoring requirements</li> </ul>
<b>UFD-AER4:</b> <i>Development infrastructure*</i> is in place in time to facilitate urban intensification or expansion	UFD-P1, UFD-P2, UFD-P4, UFD-P5, UFD-P6	<ul style="list-style-type: none"> <li>Urban intensification and growth</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>
<b>UFD-AER5:</b> New developments maximise energy and transport efficiency.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> <li>Solar energy provisions in <i>district plans</i><sup>^</sup></li> <li>Increases in <i>active transport*</i> and <i>public transport*</i></li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> <li>Regional Land Transport Plan indicator monitoring</li> <li>Census: main means of travel</li> </ul>
<b>UFD-AER6:</b> Risks due to the impacts of <i>climate change</i> <sup>^</sup> are minimal to new developments.	UFD-P4, UFD-P8	<ul style="list-style-type: none"> <li>Urban intensification and growth</li> </ul>	<ul style="list-style-type: none"> <li><i>District plan</i><sup>^</sup> variations and changes</li> </ul>

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## Definitions to be added to One Plan

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

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<b>Community services</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the following:</p> <ul style="list-style-type: none"> <li>(a) community facilities</li> <li>(b) educational facilities</li> <li>(c) those commercial activities that serve the needs of the community.</li> </ul>
<b>Development capacity</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the capacity of land to be developed for housing or for business use, based on:</p> <ul style="list-style-type: none"> <li>(a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and</li> <li>(b) the provision of adequate development infrastructure to support the development of land for housing or business use.</li> </ul>
<b>Development infrastructure</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the following, to the extent that they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002):</p> <ul style="list-style-type: none"> <li>(a) network infrastructure for <i>water*</i> supply, wastewater, or stormwater</li> <li>(b) land transport (as defined in section 5 of the Land Transport Management Act 2003).</li> </ul>
<b>Feasible</b>	<p>has the same meaning as in clause 1.4 of the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means:</p> <ul style="list-style-type: none"> <li>(a) for the short term or medium term, commercially viable to a developer based on the current relationship between costs and revenue</li> <li>(b) for the long term, commercially viable to a developer based on the current relationship between costs and revenue, or on any reasonable adjustment to that relationship.</li> </ul>
<b>Future Development Strategy</b>	<p>has the same meaning as in the National Policy Statement on Urban Development 2020 (as set out below):</p> <p>means the Future Development Strategy required by subpart 4 of Part 3.</p>
<b>Highly Productive Land<sup>60</sup></b>	<p><u>has the same meaning as in the National Policy Statement for Highly Productive Land 2020 (as set out below)</u></p>

<sup>60</sup> 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	<del>Black with strikethrough</del>
Notified changes	Purple
S42A recommended changes – new text	<u>Blue text underlined</u>
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	<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>
<b>Housing and Business Development Capacity Assessment</b>	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.
<b>Housing bottom lines</b>	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.
<b>Infrastructure-ready</b>	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).
<b>Long Term</b>	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.
<b>Medium Term</b>	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.
<b><u>Nationally significant infrastructure</u><sup>61</sup></b>	<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>

<sup>61</sup> Submission point 1.5, FS1.4  
AS-030235-422-92-V1-e



Key

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

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

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	<p>and</p> <p>(ii) enable Māori to express their cultural traditions and norms; and</p> <p>(b) have or enable a variety of <i>sites</i>* that are suitable for different business sectors in terms of location and <i>site</i>* size; and</p> <p>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</p> <p>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p>
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Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
1	Transpower New Zealand Limited		UFD-O3	Amend	In order to give effect to NPSET policies 10 and 11, an amendment is sought to the objective to specifically reference effects on nationally significant infrastructure (as defined in the NPS-UD 2020).	Amend to include: <i>(f) manages the effects on nationally significant infrastructure.</i>	1.1	<p><b>Accept in part</b></p> <p>I recommend reference to infrastructure of regional and national importance be included in clause (f) to link back to Policies 3-1 and 3-2 of the One Plan as requested in FS1.1 by NZDF.</p> <p>I recommend rewording UFD-O3 as follows: The intensification and expansion of urban environments*:</p> <p>(1) contributes to well-functioning urban environments* that</p> <p>(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,</p> <p>(b) increase housing capacity and housing choice,</p> <p>(c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,</p> <p>(d) (d) are well connected by a choice of transport modes including public transport*,</p> <p>(e) manage adverse environmental effects*, <u>and</u></p> <p>(f) <u>manage reverse sensitivity effects on the operation, maintenance and upgrade of nationally significant</u></p>

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	Transpower New Zealand Limited							<u>infrastructure or infrastructure of regional or national importance.</u>
		FS1. NZDF		Support in part	<p>NZDF supports this submission point in so far as it seeks to provide for protection of infrastructure through the management of effects of intensification and expansion of urban environments. The ongoing protection and operation of defence facilities is of primary importance for NZDF. However NZDF deems it more appropriate to refer to 'Infrastructure^ and other Physical Resources of Regional or National Importance'' (as set out in Policy 3-1). The list of 'Infrastructure and other Physical Resources of Regional and National Importance' set out at Policy 3-1 includes Transpower assets and would provide a more tailored region-specific definition than the NPS-UD definition.</p>	<p>The submission be allowed with amendments.</p> <p>A definition of 'Infrastructure^ and other Physical Resources of Regional or National Importance'' be added that refers back to Policy 3-1.</p>	FS1.1	<p><b>Accept</b></p> <p>with the replacement of existing Objective 3-3 as part of PC3, I think it is appropriate that UFD-O3 refer to infrastructure of regional and national importance which is then addressed by Policy 3-1 &amp; 3-2 of the One Plan (noting that Policy 3-1 and 3-2 are not proposed to change as part of PC3)</p> <p>I recommend rewording UFD-O3 as follows: The intensification and expansion of urban environments*:</p> <ul style="list-style-type: none"> <li>(1) contributes to well-functioning urban environments* that <ul style="list-style-type: none"> <li>(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,</li> <li>(b) increase housing capacity and housing choice,</li> <li>(c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,</li> <li>(d) (d) are well connected by a choice of transport modes including public transport*,</li> <li>(e) manage adverse environmental effects*, and</li> </ul> </li> </ul>

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	Transpower New Zealand Limited							(f) <u>manage reverse sensitivity effects on the operation, maintenance and upgrade of nationally significant infrastructure or infrastructure of regional or national importance.</u>
			UFD-P4	Amend	Transpower supports the intent of the policy but seeks amendment to provide consideration of the effects of intensification and expansion on the National Grid.	Amend UFD-P4(1) to include: <i>(f) the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised.</i>	1.2	<b>Accept</b>  I recommend the wording of UFD-P4 be amended as requested and agreed through pre-hearing.
						Amend UFD-P4(2) to include: <i>(e) ensures the operation, maintenance, and upgrade of nationally significant infrastructure* is not compromised.</i>	1.3	<b>Accept</b>  Wording added as requested with a slight change to order for better reading as follows  (2) in addition to meeting the criteria in (1) above, the expansion of <i>urban environments*</i> must only occur where it: ... (e) <u>does not compromise the operation , maintenance and upgrade of nationally significant infrastructure*.</u>
		FS1. NZDF		Support in part	NZDF supports this submission point in so far as it seeks to provide for protection of infrastructure through the management of effects of intensification and expansion of urban environments. The ongoing protection and operation of	The submission be allowed with amendments. A definition of 'Infrastructure^ and other Physical Resources of Regional or National Importance'' be added that refers back to Policy 3-1.	FS1.2	<b>Reject</b>  Infrastructure of regional and national importance is defined and effects on it protected through Policies 3-1 and 3-2 of the One Plan RPS. These policies are not subject to change through PC3. I am therefore of the opinion that effects from development on infrastructure of regional

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	Transpower New Zealand Limited				defence facilities is of primary importance for NZDF. However, NZDF deems it more appropriate to refer to 'Infrastructure^ and other Physical Resources of Regional or National Importance'' (as set out in Policy 3-1). The list of 'Infrastructure and other Physical Resources of Regional and National Importance' set out at Policy 3-1 includes Transpower assets and would provide a more tailored region-specific definition than the NPS-UD definition.			and national importance (which includes NZDF infrastructure) is sufficiently provided for in RPS policy 3-2.
			UFD-P6	Amend	While Transpower supports the effects on infrastructure as a criterion, it has concerns the reference in the criterion to "as far as reasonably practicable" does not give effect to the NPSET and is not sufficiently directive to ensure the operation, maintenance and upgrade of the National Grid is not compromised and adverse effects will not result.	Amend UFD-P6(1)(f) as follows: <i>(f) the development avoids adverse effects* on infrastructure^, and other physical resources of regional or national importance as far as reasonably practicable.</i>  <b>Or</b> <i>(f) the development avoids adverse effects* on infrastructure^ and other physical resources of regional or national importance as far as reasonably practicable.</i>	1.4	<b>Accept</b> Removal of the wording as far as reasonably practicable ensures, alignment with the NPS-ET. I recommend UFD-P6(f) be amended as requested and agreed through pre-hearing as follows.  (1) Unanticipated or out of sequence development will add significantly to <i>development capacity*</i> where: (a) the location, design and layout of the development will contribute to a <i>well-functioning urban environment*</i> ,

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	Transpower New Zealand Limited							<p>(b) the development is well-connected along transport corridors, and to <i>community services*</i>, and open space,</p> <p>(c) the development will significantly contribute to meeting demand for additional urban land identified in a <i>Housing and Business Development Capacity Assessment*</i>, or a shortfall identified by undertaking the monitoring requirements outlined in the National Policy Statement on Urban Development 2020, including meeting <i>housing bottom lines*</i>, or specific housing and price needs in the market,</p> <p>(d) the development will be realised in the <i>short term*</i> and before anticipated planned urban development,</p> <p>(e) there is adequate existing or upgraded <i>development infrastructure*</i> to support development of the <i>land*</i> without adverse <i>effects*</i> on the provision or capacity of other planned <i>development infrastructure*</i> including planned <i>infrastructure*</i> expenditure, and</p> <p>(f) the development avoids adverse <i>effects*</i> on <i>infrastructure^</i> and other physical resources of</p>



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	Transpower New Zealand Limited							regional or national importance as far as reasonably practicable.
		FS1. NZDF		Support in part	NZDF supports the proposed amendments to this provision, particularly the second alternative that proposes to remove “as far as reasonably practicable”, on the basis that it would provide greater direction to the user of the plan.	The submission be allowed. A definition of ‘Infrastructure^ and other Physical Resources of Regional or National Importance’ be added that refers back to Policy 3-1.	FS1.3	<b>Accept in part</b>  I do not recommend a definition for regional or national importance be included for the reasons given under FS1.2. Infrastructure of regional and national importance is defined and effects on it protected through Policies 3-1 and 3-2 of the One Plan RPS. These policies are not subject to change through PC3. I am therefore of the opinion that effects from development on infrastructure of regional and national importance (which includes NZDF infrastructure) is sufficiently provided for by One Plan Policy 3-2.
			Definitions	Amend	In order to support the sought amendments to UFD-O3 and UFD-P4 Transpower seeks the inclusion of a definition of “nationally significant infrastructure” as provided in the NPS-UD.	Include the NPS-UD definition of “nationally significant infrastructure”.	1.5	<b>Accept</b>  I recommend the NPS-UD definition for nationally significant infrastructure be added as requested, for the reasons outlined in paragraphs 85-87 of my s42A report. In my view the NPS-UD definition for nationally significant infrastructure is broader than the list of infrastructure considered nationally and regionally important under Policy 3-1 of the One Plan. When it comes to nationally significant

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	Transpower New Zealand Limited							infrastructure, the NPS-UD definition is more complete. It is also my opinion that including the NPS-UD definition for nationally significant infrastructure will not conflict or frustrate Policy 3-1 which provides a list of regionally and nationally important infrastructure.
		FS1. NZDF		Oppose	The Horizons Plan contains a very specific list of "Infrastructure^ and other Physical Resources of Regional or National Importance" in Policy 3-1.	The submission be allowed. A definition of 'Infrastructure^ and other Physical Resources of Regional or National Importance" be added that refers back to Policy 3-1.	FS1.4	<b>Reject</b>  The definitions provided by Policy 3-1 still stand. Urban development will also be subject to these policies. The definition of Nationally Significant Infrastructure is a NPS-UD definition, and is separate to the One Plan's list of nationally and regionally important infrastructure in Policy 3-1. I do not consider it necessary to include a cross-reference back to Policy 3-1. The One Plan is designed to be read and applied as an integrated document.
2	Waka Kotahi		UFD-I1	Support	Waka Kotahi supports these issues as it recognises the essential link between integrated land use and infrastructure planning and achieving a well-functioning environment.	Retain as notified.	2.1	<b>Accept in part.</b>  Agree, retain as notified aside from amendments to reference reverse sensitivity effects in response to other submissions.
			UFD-I3	Support		Retain as notified.	2.2	<b>Accept in part.</b>  Agree, retain as notified aside from amendments to reference reverse

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	Waka Kotahi							sensitivity effects in response to other submissions.
			UFD-O1	Support	Waka Kotahi supports this objective as it requires integrated land use and infrastructure planning and implements the NPS-UD.	Retain as notified.	2.3	<b>Accept</b> Agree, retain as notified.
			UFD-O3	Support	Waka Kotahi supports this objective as it recognises the importance of a well-functioning urban environment as defined under the NPS-UD.	Retain as notified.	2.4	<b>Accept in part</b>  Agree, retain as notified aside from amendments associated with provision of business land capacity and choice, public transport planning and to manage reverse sensitivity effects on nationally significant infrastructure in response to other submissions.
			UFD-O5	Support	Waka Kotahi supports this issue as it implements the NPS-UD.	Retain as notified.	2.5	<b>Accept</b> Agree, retain as notified.
			UFD-P1	Support	Waka Kotahi supports this issue as it recognises the importance of integrating transport investment decisions with land use planning and implements the NPS-UD.	Retain as notified.	2.6	<b>Accept in part</b>  Agree, retain as notified aside from amendments to improve clarity in response to other submissions.
			UFD-P2	Support	Waka Kotahi supports the provision of sufficient development capacity in accordance NPS-UD.	Retain as notified.	2.7	<b>Accept in part</b>  Agree, retain as notified aside from amendments to correct housing bottom lines for Palmerston North in response to other submissions.

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	Waka Kotahi		UFD-P4	Support with amendments	Waka Kotahi generally supports this policy subject to amendments to recognise the importance of connecting active and public transport modes and transport corridors to provide a well-functioning urban environment.	Support with amendments: <i>(1)(d) development is well serviced by existing or planned development infrastructure*, active and public transport*, and additional infrastructure* required to service the development capacity*...</i>	2.8	<b>Reject</b>  Development infrastructure includes land transport (as defined in the LTMA). I therefore think provision for active transport is already provided for by this policy.
						<i>(2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: .... (c) is well-connected by a variety of transport modes and along transport corridors,</i>	2.9	<b>Accept</b>  Wording amended as requested.
						<i>(4) Local authority transport plans and strategies must establish ways to contribute to well-functioning urban environments* through the provision of public transport* services and by-enabling active transport* infrastructure.</i>	2.10	<b>Accept in part</b>  I agree that the policy should also refer to enabling the infrastructure necessary to support active transport. However I don't support removing "by enabling" active transport from this policy. Enabling active transport and its associated infrastructure aligns more wholly with the NPS-UD definition for well-functioning urban environments.  I recommend UFD-P4(4) be reworded as follows: ...

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	Waka Kotahi							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, <u>including its associated infrastructure.</u>
		FS3. Kāinga Ora		Support in part	Kāinga Ora supports the submission points on UFD-P4 to the extent that it is consistent with the Kāinga Ora primary submission.	Allow in part	FS3.1	<b>Accept in part.</b>  I consider the recommended amendment to UFD-P4(4) aligns with Kāinga ora’s primary submission.
			UFD-P5	Support	Waka Kotahi supports this issue as it implements the NPS-UD.	Retain as notified.	2.11	<b>Accept in part</b>  Agree, retain as notified aside from amendments to improve clarity in response to other submissions.
			UFD-P6	Support with amendments	Waka Kotahi supports this policy and requests minor amendments to 1(b) to ensure that the connectivity of active and public transport modes and transport corridors, and commercial services (including employment opportunities) is considered when considering unanticipated or out of sequence development.	Support with amendments: <i>(1) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: ....</i> <i>(b) is well-connected by a variety of transport modes and <del>along</del> transport corridors, and to community and commercial services, and open space, ...</i>	2.12	<b>Accept in part.</b>  I agree with the requested amendments to provide a variety of transport modes. However I do not support inclusion of commercial activities in this policy. The the NPS-UD definition of ‘community activities’ (already included in Policy UFD-P6) explicitly includes commercial services. It would therefore be an unnecessary duplication to include commercial services in this policy.  I recommend UFD-P6(b) be amended as follows ...

Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	Waka Kotahi							Is well-connected <u>by a variety of transport modes and along-transport corridors</u> , and to community services, and open space...
		FS3. Kāinga Ora		Support in part	Kāinga Ora supports the submission points on UFD-P6 to the extent that it is consistent with the Kāinga Ora primary submission.	Allow	FS3.2	<b>Accept in part.</b>  Wording amended as above. I consider the recommended amendment to UFD-P6(1)(b) aligns with Kāinga ora's primary submission.
			UFD-P7	Support	Waka Kotahi supports Iwi and Hapū being involved in planning processes and a partnership approach to achieving Treaty of Waitangi principles.	Retain as notified.	2.13	<b>Accept in part</b>  Agree, retain as notified aside from amendments to remove reference to 'Maori owned land' in response to other submissions.
			UFD-P8	Support	Waka Kotahi supports this policy as it recognises the role of public and active transport in reducing greenhouse gas emissions and improving resilience in accordance with the NPS-UD.	Retain as notified.	2.14	<b>Accept in part</b>  Agree, retain as notified aside from amendments to improve clarity in response to other submissions
			Methods	Support	Waka Kotahi supports the methods to implement the policies in this chapter as they align with the requirements of the NPS-UD.	Retain as notified.	2.15	<b>Accept in part</b>  Agree, retain as notified aside from amendments to improve clarity in response to other submissions.
3	Ministry of Education		UFD-I1	Support	The Ministry supports the proposed changes to UDF-I1 as it recognises the need for	Retain as proposed.	3.1	<b>Accept in part.</b> Agree. Retain as notified except for amendments to include reference to

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	<b>Ministry of Education</b>				planned urban growth to avoid poorly planned urban development's creating uncoordinated and inefficient developments, and development of infrastructure (including additional infrastructure, such as schools).			reverse sensitivity in response to matters raised through other submissions.
			UFD-O1	Support	The Ministry supports the proposed changes to UFD-O1 to give effect to the NPS-UD. The proposed changes ensure that there is sufficient development capacity to support growth and is supported by the capacity of infrastructure and additional infrastructure to service this growth.	Retain as proposed.	3.2	<b>Accept</b>  Agree, retain as notified.
			UFD-P4	Support	The Ministry supports the proposed inclusion of UFD-P4 to ensure that the development capacity of urban environments is maximised and coordinated.	Retain as proposed.	3.3	<b>Accept in part.</b> Agree. Retain as notified except for amendments associated with provision of public transport and the operation, maintenance and upgrade of nationally significant infrastructure in response to matters raised through other submissions.
			Definitions	Support	The Ministry is supportive of the proposed inclusion of a definition for additional infrastructure, which includes schools, as defined under the NPS-UD.	Retain as proposed.	3.4	<b>Accept</b> Agree. Retain as notified.

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4	KiwiRail		UFD-I1	Amend	KiwiRail supports the description of this issue, but considers an amendment is required to recognise urban development and land use changes can result in reverse sensitivity effects, and that the interfaces between conflicting land uses must be appropriately managed.	Amend to: <i>Poorly planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, development infrastructure* and additional infrastructure. <u>It can also have the potential to create land use conflicts and reverse sensitivity effects.</u> This does not contribute to...</i>	4.1	<p><b>Accept in part.</b></p> <p>It was agreed in pre-hearing meeting that reverse sensitivity effects from poorly planned urban development should be recognised as part of this issue. The inclusion of 'land use conflicts' as proposed is not considered necessary as this is adequately addressed by inclusion of 'reverse sensitivity'.</p> <p>Amend UFD-I1 as follows: Poorly planned urban development can result in the piecemeal, uncoordinated and inefficient provision of development, <i>development infrastructure*</i> and <i>additional infrastructure*</i>. <u>It can also have the potential to create reverse sensitivity effects.</u> This does not contribute to a <i>well-functioning urban environment*</i>, can create adverse environmental <i>effects*</i> and will make it more difficult for urban development to meet the needs of current and future communities.</p>
		FS1. NZDF		Support	NZDF supports the inclusion proposed by KiwiRail to recognise urban development and land use changes can result in reverse sensitivity effects, and that the interfaces between conflicting land uses must be appropriately managed. Reverse sensitivity is a key	Allow	FS1.5	<p><b>Accept in part</b></p> <p>I recommend amendments be made to include reverse sensitivity in UFD-I1.</p>



Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	<b>KiwiRail</b>				concern for NZDF as it has the potential to impact on the ongoing safe and efficient operation of defence facilities.			
		<b>FS2. Fonterra</b>		Support	<p>Fonterra relies on the safe and efficient operation of the transportation corridors including the local and State Highway roading network, and rail corridors for its ongoing operations in the Manawatū-Whanganui Region, including tanker transport of milk to the Longburn processing site and the use of the rail network to convey concentrated milk products from the Longburn site to the other processing sites within the region and throughout the country.</p> <p>The safe and efficient operation of these transport corridors, including protecting these corridors from reverse sensitivity effects is critical to the ongoing operation of the processing sites and their contribution to the local and regional economy.</p> <p>Urban development around the Longburn processing site</p>	As set out in Fonterra's original submission, Fonterra support the provision of appropriately zoned land that will support the urban development and well functioning urban environment of Palmerston North City. Fonterra seek to ensure that its operations and their contribution to the local and regional economy are protected from reverse sensitivity effects which may result in unnecessary restrictions on those operations such that their ongoing viability is affected.	FS2.1	<p><b>Accept in part</b></p> <p>I recommend amendments be made to include reverse sensitivity in UFD-I1</p>

Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	KiwiRail				is also likely through District Plan Changes which will be enabled by PC3 and the NPS-UD.			
		FS3: Kāinga Ora		Oppose	Kāinga Ora opposes the relief sought.	Disallow	FS3.3	<b>Reject</b>  The One Plan already includes provisions to minimise the potential for reverse sensitivity effects, through Issue 3-1 and Policy 3-2. The NPS-UD and proposed provisions in PC3 do not increase the imperative to avoid reverse sensitivity effects.
			UFD-I3	Amend	KiwiRail considers express recognition of reverse sensitivity effects is necessary to ensure development near transport corridors can co-exist in an appropriate way.	Amend to: <i>A growing population increases demand for housing, business land, Infrastructure and community services. Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure <del>planning and funding decisions</del>, manages effects on the</i>	4.2	<b>Accept in part</b> with amendments.  I do not support removal of ' <i>planning and funding decisions</i> ' wording in this issue.  As discussed at pre-hearing meeting #1 and to align with changes made to include the NPS-UD definition for Nationally Significant Infrastructure (submission point 1.5) Amendments to UFD-I3 are recommended as follows:

Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	KiwiRail					<i>urban and natural environment, avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors, and improves resilience to the effects of climate change</i>		<i>"infrastructure^ and community services*. Growth needs to be provided for in a way that contributes to well-functioning urban environments*, is integrated with infrastructure^ planning and funding decisions, avoids the creation of reverse sensitivity effects on existing infrastructure of national significance, manages effects* on the urban and natural environment, and improves resilience to the effects* of climate change^."</i>
		FS1. NZDF		Support in part	NZDF supports the amendment proposed by KiwiRail to recognise that growth needs to be provided for in a way that avoids the potential for reverse sensitivity effects. NZDF considers that 'transport corridors' should be broadened to read "Infrastructure^ and other Physical Resources of Regional or National Importance" to recognise that potential reverse sensitivity effects affect a number of different infrastructure facilities and assets, including defence facilities	The submission be allowed. If the submitter's relief is accepted, then "Infrastructure^ and other Physical Resources of Regional or National Importance" should replace "transport corridors"	FS1.6	<b>Accept in part.</b>  The amended wording removes KiwiRail's proposed reference to 'transport corridors' as requested by NZDF.  Amendments to UFD-I3 make reference to nationally significant infrastructure which is a NPS-UD defined term. Infrastructure and Physical resources of regional or national Importance are addressed by Issue 3-1 of the existing RPS and are not proposed to change as part of PC3. I therefore do not consider this needs to be included in UFD-I3.  I recommend UFD-I3 be amended as follows: <i>"infrastructure^ and community services*. Growth needs to be provided for in a way that contributes to well-functioning urban environments*, is integrated with</i>

Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	<b>KiwiRail</b>							<i>infrastructure</i> ^ planning and funding decisions, <u>avoids the creation of reverse sensitivity effects on existing infrastructure of national significance</u> , manages <i>effects</i> * on the urban and natural environment, and improves resilience to the <i>effects</i> * of <i>climate change</i> ^."
		FS2. Fonterra		Support in part	As per above Fonterra comments relating to UFD-I1	As per above Fonterra comments relating to UFD-I1	FS2.2	<b>Accept in part</b>  I recommend amendments be made to include reverse sensitivity in UFD-I3.
		FS3. Kāinga Ora		Oppose	Kāinga Ora opposes the relief sought, particularly in relation to "avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors..." Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of transport corridors should first be mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to consider 'potential reverse sensitivity effects on transport corridors' for reverse sensitivity effects is ambiguous, overly directive,	Disallow	FS3.4	<b>Reject</b>  The One Plan already includes provisions to minimise the potential for reverse sensitivity effects, through Issue 3-1 and Policy 3-2. The NPS-UD and proposed provisions in PC3 do not increase the imperative to avoid reverse sensitivity effects on nationally significant infrastructure.

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	KiwiRail				and places undue responsibility on the receiving environment to mitigate adverse effects.			
			UFD-O1	Amend	Both planning and delivery need to be carefully managed to ensure that any effects at the interface of conflicting land uses, including reverse sensitivity effects, are appropriately managed.	Add clause: <i>(5) land use conflicts are minimised as far as practicable, including avoiding the potential for reverse sensitivity effects.</i>	4.3	<b>Reject</b>  Inclusion of this clause or reference to reverse sensitivity in UFD-O1 was not raised at the pre-hearing meeting on infrastructure. In considering this request, I do not believe an additional clause is required in UFD-O1. Protection of nationally significant infrastructure, and regionally and nationally important infrastructure from reverse sensitivity is addressed through UFD-O3.
		FS1. NZDF		Support	NZDF support the inclusion proposed by KiwiRail to ensure reverse sensitivity effects are appropriately managed.	Allow	FS1.7	<b>Reject</b>  Inclusion of this clause or reference to reverse sensitivity in UFD-O1 was not raised at the pre-hearing meeting on infrastructure. In considering this request, I do not believe an additional clause is required in UFD-O1. Protection of nationally significant infrastructure, and regionally and nationally important infrastructure from reverse sensitivity is addressed through UFD-O3.
		FS2. Fonterra		Support	As per above Fonterra comments relating to UFD-I1		FS2.3	<b>Reject</b> Inclusion

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	KiwiRail							of this clause or reference to reverse sensitivity in UFD-O1 was not raised at the pre-hearing meeting on infrastructure. In considering this request, I do not believe an additional clause is required in UFD-O1. Protection of nationally significant infrastructure, and regionally and nationally important infrastructure from reverse sensitivity is addressed through UFD-O3.
		FS3. Kāinga Ora		Oppose	Kāinga Ora opposes the relief sought.	Disallow	FS3.5	<b>Accept</b>  I do not recommend including reference to reverse sensitivity in UFD-O1.
			UFD-O3	Support	KiwiRail supports Objective 03 to 'enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future'.	Retain as proposed	4.4	<b>Accept in part</b>  Agree, retain as notified aside from amendments associated with provision of business land capacity and choice, public transport planning and to manage reverse sensitivity effects on nationally significant infrastructure in response to other submissions.
			UFD-O5	Support	KiwiRail supports the new policy which requires urban environments to consider and choose solutions that will contribute to reducing greenhouse gas emissions.	Retain as proposed	4.5	<b>Accept</b>  Agree, retain as notified.
			UFD-P1	Amend	KiwiRail considers express recognition of reverse sensitivity effects is necessary	Add clause: <i>3) ensure development avoids the potential for reverse</i>	4.6	<b>Reject</b>

Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	<b>KiwiRail</b>				to ensure development near transport corridors can co-exist in an appropriate way.	<i>sensitivity effects on the safe and efficient operation of transport corridors.</i>		Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4
		FS1. NZDF		Support in part	NZDF support the amendment proposed by KiwiRail to recognise that growth needs to be provided for in a way that avoids the potential for reverse sensitivity effects. However, NZDF considers that 'transport corridors' should be broadened to read "Infrastructure^ and other Physical Resources of Regional or National Importance" to recognise that potential reverse sensitivity effects affect a number of different infrastructure facilities and assets, including defence facilities.	The submission be allowed. If the submitter's relief is accepted, then "Infrastructure^ and other Physical Resources of Regional or National Importance" should replace "transport corridors"	FS1.8	<b>Reject</b>  Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4. Protection of regionally and nationally important infrastructure is addressed through existing One Plan policy 3-2 (with regionally and nationally important infrastructure listed in Policy 3-1). Noting that Policies 3-1 and 3-2 are not proposed to change through PC3.
		FS2. Fonterra		Support	As per above Fonterra comments relating to UFD-I1		FS2.4	<b>Reject</b>  Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4
		FS3. Kāinga Ora		Oppose	Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of transport corridors should first be	Disallow	FS3.6	<b>Reject</b>  The One Plan already includes provisions to minimise the potential for reverse sensitivity effects, through Issue 3-1 and Policy 3-2. The NPS-UD and proposed

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	KiwiRail				<p>mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to consider 'conflicting land uses' for reverse sensitivity effects is ambiguous, overly directive, and places undue responsibility on the receiving environment to mitigate adverse effects.</p> <p>Noting also that lower density in areas that have been identified for growth is not an efficient land use.</p>			provisions in PC3 do not increase the imperative to avoid reverse sensitivity effects on nationally significant infrastructure.
			UFD-P2	Amend	<p>KiwiRail considers that express recognition is needed for the consideration of reverse sensitivity effects which must be carefully managed when providing for out-of-sequence urban growth.</p>	<p>Add clause: <i>(4) The development avoids the potential for reverse sensitivity effects on the safe and efficient operation of infrastructure, including transport corridors.</i></p>	4.7	<p><b>Reject</b></p> <p>UFD-P2 is associated with providing sufficient development capacity and land to accommodate demand and is in accordance with Policy 2 of the NPS-UD. It would be out of step with the policy intent to include reference to reverse sensitivity in this policy. Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4.</p>
		FS1. NZDF			Support	<p>NZDF support the inclusion proposed by KiwiRail to ensure reverse sensitivity effects on infrastructure, are carefully managed but considers that it should read</p>	<p>The submission be allowed with amendments.</p> <p>If the submitter's relief is accepted, then "Infrastructure^ and other Physical Resources of</p>	FS1.9



Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	<b>KiwiRail</b>				“safe and efficient operation of ‘infrastructure^ and other Physical Resources of Regional or National Importance’ for consistency with the Plan and points above.	Regional or National Importance” should replace “infrastructure, including transport corridors”		of step with the policy intent to include reference to reverse sensitivity in this policy. Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4.  Protection of regionally and nationally important infrastructure is addressed through existing One Plan policy 3-2 (with regionally and nationally important infrastructure listed in Policy 3-1). Noting that Policies 3-1 and 3-2 are not proposed to change through PC3.
		FS2. Fonterra		Support	As per above Fonterra comments relating to UFD-I1		FS2.5	<b>Reject</b>  UFD-P2 is associated with providing sufficient development capacity and land to accommodate demand and is in accordance with Policy 2 of the NPS-UD. It would be out of step with the policy intent to include reference to reverse sensitivity in this policy. Provision for the operation, maintenance and upgrade of nationally significant infrastructure is addressed in UFD-P4.
		FS3. Kāinga Ora		Oppose	Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of transport corridors should first be	Disallow	FS3.7	<b>Reject</b>  The One Plan already includes provisions to minimise the potential for reverse sensitivity effects, through Issue 3-1 and Policy 3-2. The NPS-UD and proposed

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	KiwiRail				<p>mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to consider 'conflicting landuses' for reverse sensitivity effects is ambiguous, overly directive, and places undue responsibility on the receiving environment to mitigate adverse effects. Noting also that lower density in areas that have been identified for growth is not an efficient landuse</p>			provisions in PC3 do not increase the imperative to avoid reverse sensitivity effects on nationally significant infrastructure.
			UFD-P4	Amend	<p>Some infrastructure due to its linear nature may need to traverse scheduled areas in order to maintain or enhance services. While scheduled locations are always considered as a constraint it may be appropriate to mitigate or off set urban or infrastructure development in these locations in order to achieve the plan's wider objectives.</p> <p>Some unanticipated plan changes may not be adjacent to urban environment boundaries. KiwiRail considers that express recognition is</p>	<p>Amend to: (e) it protects, <u>where practicable</u>, natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character.</p>	4.8	<p><b>Reject</b></p> <p>I consider that adding the words 'where practicable' will weaken the intent of this policy. Through pre-hearing meetings KiwiRail confirmed they would not be pursuing this submission point.</p>
					<p>d) manages adverse reverse sensitivity effects on land with existing incompatible activities <del>or adjacent to the urban environment* boundary</del></p>		4.9	<p><b>Accept in part.</b></p> <p>I agree with KiwiRail that reverse sensitivity should be addressed where it occurs, however complete removal of this part of the policy would weaken it. Amend UFD-P4(2)(d) as per agreement reached in pre-hearing meeting 1 to: ....</p>

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	KiwiRail				needed for the consideration of reverse sensitivity effects both near the urban boundary and elsewhere.			(2) In addition to meeting the criteria in (1) above, the expansion of <i>urban environments*</i> must only occur where it: <ul style="list-style-type: none"> <li>(a) is adjacent to existing or planned urban areas,</li> <li>(b) will not result in inefficient or sporadic patterns of settlement and residential growth and is an efficient use of the finite land resource,</li> <li>(c) is well-connected along transport corridors,</li> <li>(d) manages adverse reverse sensitivity <i>effects*</i> on land with existing incompatible activities, <u>including</u> adjacent to the <i>urban environment*</i> boundary</li> </ul>
			UFD-P6	Support	KiwiRail supports the intent of Policy 6 and supports clause (f).	Retain as proposed	4.10	<b>Accept in part</b>  Agree. Retain as notified except for amendments associated with transport options, and planned development infrastructure made in response to matters raised through other submissions.
			UFD-P8	Support	KiwiRail supports UFD P8.	Retain as proposed	4.11	<b>Accept in part</b>  Agree. Retain as notified except for the amendments associated with supporting greenhouse gas emissions and integration of walking and cycling into land use

Sub No.	Submitter Name	Further submitter	Specific Plan Provision	Support/ Oppose / Amend	Reasons	Decision/Action Requested	Submission point No.	S42A recommendation
	KiwiRail							development – made in response to other submission points
			Definitions	Support	KiwiRail supports the 'additional infrastructure' definition.	Retain as proposed	4.12	<b>Accept</b>  Agree. Retain as notified.
			Definitions	Support	KiwiRail supports the "well-functioning urban environments" definition.	Retain as proposed	4.13	<b>Accept</b>  Agree. Retain as notified.
5	Wellington Fish and Game Council		UFD-I3	Support with amendments	Urban development policy which has the hierarchy of obligations of Te Mana o te Wai and the NPS-FM as core concepts will lead to ease of integrations and a focus on restorative development.	Amend to: Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure planning and funding decisions, manages the effects of growth, <b>and leads to improvements in</b> the urban and natural environment <b>including freshwater</b> , and improves resilience to the effects of climate change.	5.1	<b>Accept in part.</b>  I accept the need to recognise the need for urban development to not be enabled at the expense of the natural environment. However, the scope of PC3 is limited.  Recommend UFD-I3 be amended as follows: Growth needs to be provided for in a way that contributes to well-functioning urban environments, is integrated with infrastructure planning and funding decisions, <u>does not worsen</u> effects on the urban and natural environment ( <u>including freshwater</u> ), and improves resilience to the effects of climate change.
			UFD-O1 (2)	Support with amendments	To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural	Amend to: New development, development infrastructure and additional infrastructure are provided in a coordinated, integrated, and efficient	5.2	<b>Reject</b>  The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3. Additionally

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	Wellington Fish and Game Council				environments and design resilient forms and functions.	manner <b><i>which maintains or improves the natural environment including freshwater and increases resilience to climate change.</i></b>		Horizons has commenced a separate review of the One Plan in response to the NPS FM that addresses freshwater quality. In my view the matters raised in this submission point are more appropriately addressed through that process.
			UFD-O3 (1)	Support with amendments		Amend to: (e) manage adverse environmental effects <b><i>so impacted environments are improved and enhanced.</i></b>	5.3	<b>Reject</b>  The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3. I am of the view that UFD-O3(1)(e) provides sufficient protection for environmental effects and aligns with the direction of the NPS-UD.
			UFD-P1 (2)	Support with amendments		Amend to: Ensure there is coordination between the location, form, and timing of urban growth and the funding, delivery, and implementation of development structure <b><i>which helps improve the natural environment.</i></b>	5.4	<b>Reject</b>  The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3.
			UDF-P8 (1)	Support with amendments	Urban development in a sustainable future requires coordinated planning and design to mitigate the impacts of climate change on urban areas and populations, and ameliorate the impact of a growing population and	Amend to: Urban environments are developed in ways that reduce greenhouse gas emissions, improve resilience to the effects of climate change, and <b><i>reduce stress on and lead to improvements in freshwater</i></b>	5.5	<b>Reject</b>  The outcomes for natural values (including freshwater quality) are addressed by other chapters of the One Plan and there is no need to replicate those in PC3. Urban development proposals will be subject to those provisions. I also consider it is

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	Wellington Fish and Game Council				<p>expanding urban area on the environment.</p> <p>Storm water, flood protections, abstractions and water storage must be integrated with national policy including the hierarchy of obligations of Te Mana o te Wai, and to ease confusion this should be explicitly stated in the RPS UFD. Urban design cannot be developed at the expense of freshwater ecosystems.</p>	<p><b><i>ecosystems and the natural environment.</i></b></p> <p>(c) requiring best practice resilience to the impacts of climate change, including sea level rise, and any increases in the scale and frequency of natural hazard events, <b>while giving effect to Te Mana o te Wai.</b></p>		premature to attempt to get ahead of Horizons' NPS-FM plan change by inserting references to elements of the NPS-FM.
			Method 2 (b)	Support	Development infrastructure to include three waters infrastructure which reduces negative impacts on the receiving freshwater environment.	Retain.	5.6	<p><b>Accept</b></p> <p>Agree. Retain as notified.</p>
			Method 3	Support	Stormwater, wastewater and other water infrastructure must be developed in a coordinated way to avoid adverse environmental effects caused by urban growth outstripping essential services.	Retain.	5.7	<p><b>Accept</b></p> <p>Agree. Retain as notified.</p>
			UFD-PR3	Support	This phrase helps integrate urban development with the natural environment, and should be integrated throughout the RPS UFD:	This phrase should be emphasised throughout the Proposed Plan Change 3.	5.8	<p><b>Reject</b></p> <p>In my view, this concept is adequately addressed through the provisions in PC3 as well as the remainder of the One Plan.</p>

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	Wellington Fish and Game Council				<i>“Provisions in this chapter also seek to ensure urban development positively impacts the quality of urban environments, the quality of life for residents, and the quality of the natural environment.”</i>			
			UFD-AER4	Support with amendments	To achieve climate change resilience and well-functioning urban environments, urban development needs to create healthier natural environments and design resilient forms and functions.	Amend to: Development infrastructure is in place in time to facilitate urban intensification or expansion <b><i>with no adverse environmental impacts caused, and remediation to existing damage where possible, including to freshwater quality and quantity.</i></b>	5.9	<b>Reject</b>  In my view, this concept is adequately addressed through the provisions in PC3 as well as the remainder of the One Plan.
6	Summerset Group Holdings Limited		UFD-O1	Support	It is important that a range of development typologies, including retirement villages, are provided for to cater to the specific and changing needs of retirement age people.	Retain	6.1	<b>Accept</b>  Agree, noting proposed changes in response to other submission points, which in my view do not affect the ability to consider a range of development typologies.
			UFD-O3 (1)	Support	This objective reflects the importance of recognising and providing for the changing needs of populations, including those of retirement age, particularly through increasing housing choice.	Retain	6.2	<b>Accept</b>  Agree. noting proposed changes in response to other submission points, which in my view do not affect the policy’s ability to provide for the changing needs of populations.
			UFD-O3 (2)	Amend	The objective provides for the expansion of urban	Amend:	6.3	<b>Reject</b>

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	Summerset Group Holdings Limited				<p>environments, however this is not reflected in clause 2, which refers only to “areas of an urban environment”, which are presumably existing.</p> <p>Given that retirement villages are typically established on sites of at least 8ha and up to 10ha in size, and the scarcity of such areas in many existing urban environments, it is important to Summerset that flexibility is provided to expand beyond the existing urban environment, where appropriate.</p>	<p><i>(2) enable more people to live in, and more businesses and community services* to be located in, areas of an urban environment* or through the expansion of an urban environment where:</i></p>		The opening part of UFD-O3 “ <i>The intensification and expansion of urban environments</i> ” already provides for expansion. It is not necessary to repeat this in UFD-O3(2).
			UFD-P2	Amend	<p>The policy refers to urban expansion and out of sequence development, however the introduction refers to accommodating demand “in urban environments” only. This results in inconsistency within the provision.</p> <p>It is important to Summerset that flexibility is provided to expand beyond the existing urban environment, where appropriate.</p>	<p>Delete reference to “in urban environments” as follows:  <i>Sufficient development capacity* and land* supply is provided for in the short term*, medium term* and long term* to accommodate demand for housing and business land* <del>in urban environments*</del> by:</i></p>	6.4	<p><b>Reject</b></p> <p>UFD-P2 gives effect to NPS-UD policies 2, 8 and 7. It is appropriate for this policy to apply to urban environments. To remove it, would open interpretation up to all urban areas in the region no matter how small. In my view this goes beyond the intent of the NPS-UD.</p>



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	Summerset Group Holdings Limited	FS3. Kāinga ora		Support	Kāinga Ora supports the clarity provided through the deletion of urban environments, noting the urban environment will increase through long term provision of development capacity.	Allow	FS3.7	<b>Reject</b>  UFD-P2 gives effect to NPS-UD policies 2, 8 and 7. It is appropriate for this policy to apply to urban environments. To remove it, would open interpretation up to all urban areas in the region no matter how small. In my view this goes beyond the intent of the NPS-UD.
			UFD-P4	Support	Summerset supports the recognition that the policy gives to “ <i>intensification and expansion of urban environments</i> ”, rather than intensification and expansion that only being provided for within existing urban environments.	Retain	6.5	<b>Accept</b>  Agree. This part of UFD-P4 is to be retained as notified.
			UFD-P6	Amend	Summerset supports the intention of this policy, however seeks recognition within the provision that the unanticipated or out of sequence development may be appropriate prior to the establishment of transport corridors, community services*, and open space.	Amend: <i>(b) the development is, or will be, well-connected along existing or anticipated transport corridors, and to existing or anticipated community services*, and existing or anticipated open space</i>	6.6	<b>Accept in part.</b>  I agree the policies should not require all necessary infrastructure to be installed, but to also be programmed or sequenced in some strategic planning document. This was discussed at a pre-hearing meeting in response to submission point 2.9 (Waka Kotahi) and amended wording was agreed as follows.  Amend UFD-P6(1)(b) wording to: ... The development is well-connected <del>along</del> by a variety of transport modes and

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	Summerset Group Holdings Limited							transport corridors, <del>and to</del> community services, and open space. ... In my view the amendments above address this submission point.
		FS3. Kāinga ora		Support in part	Kāinga Ora supports an amendment to the wording of the policy to allow out of sequence development to be coupled with planned transport corridors, community service and open space and not just existing infrastructure and services.	Allow in part	FS3.8	<b>Accept in part.</b>  I recommend UFD-P6(1)(b) be amended to read ... The development is well-connected <del>along</del> <u>by a variety of transport modes and</u> transport corridors, <del>and to</del> community services, and open space. ... In my view the amendments above address this submission point.
7	Horowhenua District Council		General	Clarification sought	We note that the Plan Change does not provide guidance on development of smaller settlements that do not meet the definition of Tier 1, 2 or 3, or on which settlements may be escalated up a level over time as growth increases.	Some guidance on such matters would be useful.	7.1	<b>Accept in part.</b>  The scope of PC3 is limited to giving effect to the NPS-UD i.e. development of urban areas. Generally the provisions of PC3 do not apply to settlements under 10,000 people. With the exception of UFD-O1 which incorporates the principles of existing One Plan RPS Objective 3-3 which will be replaced by UFD-O1. I accept that PC3 could provide greater clarity on how smaller settlements are addressed and recommend amendments to the scope and background of PC3, under

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	Horowhenua District Council							the heading 'Urban development and the National Policy Statement on Urban Development 2020' as follows:  <u>"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*."</u>
			General	Amend	We consider that well-functioning urban environments/sustainable growth should be escalated to be a keystone environmental issue – essentially setting out "The Big Five" instead of "The Big Four" in Chapter 1.3 of the One Plan.	That Plan Change 3 reporting includes an assessment of whether Sustainable Urban Growth should be included as a 'keystone environmental issue' in Chapter 1.3 of the One Plan.	7.2	<b>Reject</b>  In my opinion inclusion of urban development capacity as part of the One Plan 'Big four' is out of scope. PC3 did not notify changes to the 'Big four', contained in Chapter 1 of the One Plan.
			Objectives & Policies	Clarification sought	We note that some of the Objectives and Policies in Plan Change 3 include lists of criteria. It would benefit Regional Plan users and provide more guidance for development if it were clarified whether all or	That where Plan Change 3 provisions include a list of criteria, it needs to be made clearer (though the use of and/or) whether all or some of the criteria need to be met in order for a proposal to be consistent with the provisions.	7.3	<b>Reject</b>  The formatting used in PC3 is consistent with the operative One Plan and I do not support changing the list structure as proposed.

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	Horowhenua District Council				one/some of the criteria are expected to be met.			
		FS3. Kāinga ora		Support in part	Kāinga Ora supports the clarity sought within this submission.	Allow	FS3.9	<b>Reject</b>  The formatting used in PC3 is consistent with the operative One Plan and I do not support changing the list structure as proposed.
			General Provisions	Amend	We note that some of the provisions of PC3 appear to blur the lines between Regional Council and Territorial Authority functions. We consider that these matters are best left to District and City Plans, as they are currently.	Remove reference to residential density/amenity matters from the proposed provisions of PC3.	7.4	<b>Accept</b>  Through pre-hearing meetings it was clarified that this point relates to the wording “relates well to its surrounding environment” in UFD-O3 and “relate well to the surrounding environment” in UFD-P4.  I agree that this wording encroaches somewhat into amenity matters that are addressed through district plans.  I recommend UFD-O3(1)(c) be amended as follows:  “The intensification and expansion of <i>urban environments</i> *: (c) achieve a quality, sustainable and compact urban form <del>that relates well to its surrounding environment</del> ”,  I recommend that UFD-P4(1)(b) be amended as follows:

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	Horowhenua District Council							"Intensification and expansion of <i>urban environments</i> * is provided for and enabled in <i>district plans</i> ^ where: (b) it provides for a range of residential areas that enable different housing types, <i>site</i> * size and densities <del>that relate well to the surrounding environment</del> "
		FS3. Kāinga ora		Oppose	Kāinga Ora oppose the relief sought as it is inconsistent with the objective and policies of the NPS-UD, which specifically refers to both Regional Policy Statements and District Plans relating to density requirements.	Disallow	FS3.10	<b>Reject</b>  Following clarification on the detail of submission point 7.4 at the pre-hearing meeting (Topic 2 TA matters), I am comfortable with the relief sought by Horowhenua District Council.
			UFD-O3 UFD-P4	Amend	We have concern that the wording of provisions such as <b>UFD-03</b> and <b>UFD-P4(1)(d) and (2)(c)</b> may have unintended for communities such as the Horowhenua District. We would prefer to see wording that recognises that greenfields areas in particular should be designed to accommodate future public transport.	Amend references to/requirements for public transport services/corridors to recognise that public transport may not yet be available to all urban settlements, and require these services to instead be provided for, to ensure urban growth is more futureproof.  Clarify that the provision of public transport is a Regional Council function.	7.5	<b>Accept</b>  I agree this objective and policy should be amended to remove the risk of interpretation that forecloses urban development because public transport is not already in place. Provision of public transport is the responsibility of regional council. Public transport planning and implementation is guided by the Regional Public Transport Plan and is subject to a separate planning and funding process. The key requirement is that public transport is able to be implemented as part of any intensification or expansion of the urban environment.

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	Horowhenua District Council							<p>I recommend amending the wording of <b>UFD-O3(1)(d)</b> as follows:</p> <p>...</p> <p>Are, <u>or planned to be</u>, well connected by a choice of transport modes including public transport.</p> <p>I recommend amending the wording of <b>UFD-O3(2)(b)</b> as follows</p> <p>...</p> <p><u>Is able to be</u>, or is, well serviced by existing or planned public transport</p> <p>I recommend amending the wording of <b>UFD-P4(1)(d)</b> as follows:</p> <p>...</p> <p>Development is well serviced by existing or planned <i>development infrastructure*</i> and <u>enables provision</u> of <i>public transport*</i>, and <i>additional infrastructure*</i> required to serve the <i>development capacity*</i> is likely to be achieved,</p>
		FS3. Kāinga ora		Oppose	Kāinga Ora oppose the relief sought, as PC3 already proposes UFD-O3(2)(b) and UFD-P4(1)(d) to include reference to existing or planned public transport.	Disallow	FS3.11	<p><b>Reject</b></p> <p>Due to the separate process undertaken by regional councils for planning and delivering public transport, it would be onerous for that development to be delayed because public transport is not in place. Provided the intensification and expansion enables public transport to be provided, I am of the view that the requirements of the NPS-UD are reflected in the changes recommended to</p>

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	Horowhenua District Council							UFD-O3(1)(d), UFD-O3(2)(b), and UFD-P4(1)(d).
			UFD-P4	Support with amendments	While Horowhenua District Council supports intensification, we acknowledge that greenfields development provides more opportunity to deliver development at the scale needed to meet demand and provides a 'clean slate' to deliver better environmental solutions, especially in respect of stormwater management and water sensitive design.	Provide separate policies for Intensification and Greenfields Development as part of PC3, but retain the neutral stance between the two.  Provide more direction in these two policies to encourage more efficient utilisation of residential land, such as density targets or other methods and encourage water sensitive design.	7.6	<b>Reject</b>  In my opinion, UFD-P4 already provides this differentiation and Method 2 provides further direction. UFD-P4(1) relates to both intensification and expansion. UFD-P4(2) provides additional criteria for urban expansion to meet in order for development to occur. I am satisfied that this provides an appropriate level of distinction between the requirements associated with greenfields growth (expansion) and intensification. In addition I consider the approach of PC3 aligns with the NPS-UD, including in relation to achieving 'well-functioning urban environments'. Lastly, while the proposed provisions (including Method 2) do not prohibit greenfield development they do require it to be evidence based as requested by this submission.
		FS3. Kāinga ora		Oppose in part	Whilst Kāinga Ora recognise the need for greenfield development, such development must still meet the requirements outlined within Policy 4 to provide for well-functioning urban	Disallow	FS3.12	<b>Accept</b>  I do not recommend the requested amendments to UFD-P4 as requested through submission point 7.6

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	Horowhenua District Council				environments. Kāinga Ora does not consider that greenfield development should be provided separate provisions. Out of sequence developments need to meet the tests required under Policy UFD-P6 to ensure that they will add significantly to development capacity and contribute to a well-functioning urban environment.			
			General	Amend	As PC3 has been notified after the NPS-HPL was gazetted, this plan change presents an opportunity to bring the current One Plan provisions relating to the protection of versatile soils into line with the new requirements and ensure they remain fit for purpose.	Rewording provisions that refer to Class I and II soils to now refer to Class III also, and to change the references from “versatile soils” to “highly productive land” as appropriate.	7.7	<p><b>Accept in part</b></p> <p>The ability to incorporate matters from the NPS-HPL into PC3 was discussed through a pre-hearing meeting. It is raised in a number of submissions. PC3 drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL and I don’t believe there is scope within PC3 to make wholesale changes to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to identify highly productive land and give effect to the NPS-HPL. However, it is important to ensure PC3 does not conflict with the NPS-HPL. This submission and others, and discussions at the pre-hearing suggest that the use of the term versatile soils does conflict.</p>



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	Horowhenua District Council							<p>In response to this and other submissions, changes are recommended to the scope and background, UFD-I2, UFD-O2, UFD-P3, UFD-PR2 and UFD-AER2 provisions of PC3 to <b>remove reference to versatile soils and replace with the NPS-HPL expression of 'highly productive land'</b>.</p> <p>These changes largely address the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing.</p>
			UFD-P6	Clarification sought	We would like to see more guidance in Plan Change 3 around a clear and efficient pathway for consenting to provide certainty, whilst still recognising the need for environmental standards.	Include more guidance in the PC3 provisions around a pathway for Regional Council consenting of community water, wastewater and stormwater infrastructure.	7.8	<p><b>Reject</b></p> <p>In my opinion, including detail or guidance in PC3 about regional council consenting pathways for water, wastewater and stormwater goes beyond the scope of this RPS change as defined in the s32. Water abstraction, discharges and development of this kind of infrastructure is addressed through Chapter 5 of the RPS and varying chapters of the Regional Plan which determine when a consent is required. In my view, to include guidance within PC3 policies as sought, would require more analysis to ensure it did not impact or frustrate these other chapters of the One Plan.</p>

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	Horowhenua District Council		UFD-P1(2)		It is unclear what methods Territorial Authorities could use to implement <b>UFD-P1(2)</b> .	Provide further direction/clarity on <b>UFD-P1(2)</b> .	7.9	<b>Reject</b>  The development and implementation of land use strategies is covered in Method 2 to implement UFD-P1(2) – land use strategies could take the form of a future development strategy or growth strategy. However depending on whether an area is Tier, 1, 2, or 3, will likely dictate what that strategy might look like i.e. not everyone will have a future development strategy. Smaller areas may have a growth strategy or something similar. Method 2 provides for this.
			UFD-P6		It would be clearer to reword UFD-P6(e) to “adequate existing development infrastructure, or sufficient upgrades are able to be made to existing development infrastructure...”	Reword <b>UFD-P6(e)</b> as requested.	7.10	<b>Accept in with amendments.</b>  I agree that the policy should not require all necessary infrastructure to be installed, but to also be programmed or sequenced in some strategic planning document. However, the criteria of UFD-P6 seeks to place more stringency on out of sequence developments to ensure they do not adversely affect other planned development. I have therefore recommended amending wording of UFD-P6(1)(e) to:  ...  There is adequate existing, or <del>upgraded</del> <u>planned upgrades</u> to development infrastructure, to support development of

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								the land without adverse effects on the provision or capacity of other planned development infrastructure expenditure, and  ---
			UFD-P7(2)(b)	Amend	We consider the wording of <b>UFD-P7(2)(b)</b> to be overly restrictive in that it does not provide for these land uses to establish on landholdings outside of Māori ownership.	Remove the reference to Māori owned land in <b>UFD-P7(2)(b)</b> .	7.11	<b>Accept</b> I don't believe PC3 intended to limit the ability for Māori to construct papakāinga housing on land that is not held in Māori title. I recommended UFD-P7(2)(b) be amended as follows: ... Enables papkāinga housing and marae on <del>Māori owned land</del> ,
		FS3. Kāinga ora		Support in part	Kāinga Ora supports provisions that enable Māori to develop their own land in a manner that supports their aspirations. Kāinga Ora however note that consistent with its own submission that papakāinga should also be provided for on general title land.	Allow in part	FS3.13	<b>Accept</b> I recommended UFD-P7(2)(b) be amended as follows: ... Enables papkāinga housing and marae on <del>Māori owned land</del> , ...
			General	Amend	We note that the Plan Change essentially repeats the provisions of the NPS-UD, rather than seeking to provide a more tailored, regional direction. We consider that more regional direction in the	We request more regional direction on how to ensure urban development is resilient to the effects of climate change.	7.12	<b>Accept in part</b>  I do not consider it to be the role of PC3 to provide detail on how to make urban development resilient to the effects of climate change. However, it is noted that Method 4 outlines actions associated with

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	Horowhenua District Council				<p>plan change would be more efficient and effective means of achieving the purpose of the Resource Management Act.</p> <p>We note that the wording of PC3 departs slightly from NPS-UD in some places. This has the potential to cause confusion and may be seen to indicate that Horizons have different priorities when it comes to urban development.</p>	<p>If PC3 does not provide regional-specific direction and instead just repeats the NPS-UD, the PC3 provision wording should reflect the exact wording and word order of the NPS-UD unless there is a specific regional issue that is intended to be addressed.</p> <p>Where this relates to definitions in particular, we request that the definitions be limited to “as per the National Policy Statement – Urban Development 2020 or any subsequent amendment” or similar.</p>		<p>provision of information for climate change adaptation and improve understanding of climate change. Both Horizons and territorial authorities are responsible for Method 4.</p> <p>Through development of the provisions, alignment with the NPS-UD was considered and evaluated as part of the section 32 report (section 9). The s32 report considers relying on the wording in the NPS-UD (as per the submitter’s request and concluded that the proposed provisions are “anticipated to be more effective and efficient than the alternatives”. On that basis, I am comfortable with PC3’s reliance on the NPS-UD terminology. However, as pointed out by submitters, there are inconsistencies in terminology used across some provisions of PC3.</p> <p>I have recommended changes to align more firmly with the NPS-UD terminology used for the following provisions.</p> <p><b>UFD-O3(2)</b> enable more people to live in, and more businesses and <i>community services*</i> to be located in, areas of an <i>urban environment*</i> where: (a) it is in or near a <i>centre zone*</i> or other area with many employment opportunities, or</p>

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	Horowhenua District Council							<p>(b) it is well-served by existing or planned <i>public transport*</i>, <del>or</del></p> <p>(c) there is a high demand for housing or <i>business land*</i>, relative to other areas within that <i>urban environment*</i></p> <p><b>UFD-O4</b>  <i>Planning decisions*</i> <del>regarding relating to</del> <u>urban environments*</u> take into account the <u>principles of the Treaty of Waitangi (Te Tiriti o Waitangi)^</u> <del>principles.</del></p> <p><b>UFD-P1</b>  <i>Territorial Authorities*</i> must proactively develop and implement appropriate <i>land^</i> use strategies to manage urban growth <del>and they should aligns their infrastructure^</del> <u>asset management planning with those strategies, to ensure the efficient and effective provision of associated infrastructure^</u> that:</p> <p>(1) <u>for urban environments*</u> demonstrate how <i>sufficient development capacity*</i> for housing and <i>business land*</i> will be provided in the <i>short term*</i>, <i>medium term*</i> and <i>long term*</i> in a well-planned and integrated manner, and</p> <p>(2) <u>for all settlements,</u> ensure there is co-ordination between the location, form and timing of urban growth, funding, delivery and</p>

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	Horowhenua District Council							<p>implementation of <i>development infrastructure</i>.*</p> <p><b>UFD-P4(3)</b>  <i>District plans</i>^ applying to <i>urban environments</i>* must enable heights and density of urban form which are <u>commensurate with equal to</u> the greater of:  (a) <del>demonstrated</del> <u>relative</u> demand for housing and/or business use <u>in that location</u>, or</p> <p><b>UFD-P6</b> <del>Significant <i>development capacity</i>*</del> criteria <u>for evaluating unanticipated or out of sequence development</u></p> <p>I do not support changes to UFD-O1 to apply to only urban environments. Given this objective replaces the existing RPS Objective 3-3, changes need to ensure they preserve the intent of the existing One Plan provisions (based on the scope outlined in the s32 evaluation). In my view the requirements of UFD-O1, even if applied to smaller settlements are reasonable.</p>
			UFD-P8(1)(c)	Clarification sought	Unclear about what is meant by best practice resilience – is it national direction, climate change adaptation or something else?	More clarification on best practice resilience	7.13	<p><b>Accept in part.</b></p> <p>I agree that it is unclear what is meant by best practice resilience. In analysing the policy further I consider the words ‘best practice’ should be removed from UFD-</p>

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	Horowhenua District Council							<p>P8(1)(c) as they add unnecessary detail, create uncertainty and go beyond the intent of the NPS-UD. I recommend UFD-P8(1)(c) be amended as follows:</p> <p>Urban environments* are developed in ways that reduce greenhouse gas^ emissions and improve resilience to the effects* of climate change^ by:</p> <p>a.. b.. c. requiring <del>best practice</del> resilience to, the impacts of climate change^, including sea level rise* and any increases in the scale and frequency of natural hazard* events.</p>
8	Dr. Sharon Stevens		UFD-P5	Neutral	<p>With regards to urban expansion or greenfield development, combined social and ecological outcomes may in many cases be improved by looking at collective or mini-neighbourhood purposes prior to subdividing.</p> <p>Possibilities exist for connecting more people to the land and better serving ecosystem values by thinking at a scale larger than a single-family unit but smaller than a 20-minute neighbourhood.</p>	Promotion of collective living arrangements in the plan change - specifically in relation to UFD-P5.	8.1	<p><b>Reject</b></p> <p>UFD-P4 and UFD-P5 address enabling a range of housing types. There are many different housing types and I don't consider it necessary to list them all.</p> <p>UFD-P5(4) also enables development across multiple or amalgamated properties to achieve the requirements of UFD-P5 which includes different housing types and densities. In my view this supports collective living.</p> <p>Further UFD-P7 also addresses enabling papakāinga housing.</p>

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	Dr. Sharon Stevens		UFD-P8	Support with amendments	I support the plan’s interest in compact housing and infill and also the preference for infill over greenfield development. I support the plan’s inclusion of active and public transport. I support the provisions for “water-based design and nature-based solutions” and consideration given to increases “in the scale and frequency of natural hazard events.”	I ask for: <ul style="list-style-type: none"> <li>• “active transport” to be amended to read as “safe active transport including protected cycleways.”</li> <li>• additional emphasis on green infrastructure for flood mitigation, a value that is in conflict (or at least in tension) with other aspects of the plan.</li> <li>• stronger measures that limit impermeable surfaces.</li> <li>• planning provisions to promote tiny home development without the landscape fragmentation required by full subdivision.</li> <li>• that the One Plan actively promotes well-designed rain gardens inclusive of biodiversity</li> <li>• that the One Plan requires urban expansions to take into account waterways, including</li> </ul>	8.2	<p><b>Reject</b></p> <p>I consider the requests from this submission to go beyond the requirements of the NPS-UD.</p> <p>Bullet point 1: Safety is addressed in proposed Objective 3(1)(a).</p> <p>Bullet point 2: UFD-P8 already refers to “water sensitive design and nature based solutions” – more specific details would be the responsibility of District Plans.</p> <p>Bullet Point 3: I believe this is responsibility of District Councils and is generally addressed through District Plans and infrastructure strategies.</p> <p>Bullet point 4: This is addressed in policies UFD-P4 and P5 “...provides for a range of housing types...” there are many different housing types and I don’t consider it necessary to list them all.</p> <p>Bullet point 5: UFD-P8 already refers to “water sensitive design and nature based solutions” – more specific details would be the responsibility of District Plans.</p> <p>Bullet point 6: this goes beyond the scope of PC3. There are other provisions in Chapters 5 (RPS) and 14 (Regional Plan) of the One Plan designed to protect water</p>



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	Dr. Sharon Stevens					ephemeral and historic waterways that have been degraded by catchment abuse.		quality. Any future development would be subject to the requirements of these provisions in the One Plan and would be tested through consent processes.
			Whole PC3	Amend	I ask that food miles be considered part of urban emissions and be addressed by: <ul style="list-style-type: none"> <li>• appropriate provisions for food gardens within 20 minute neighbourhoods and also by</li> <li>• provision for the development of larger-scale urban farms.</li> </ul>		8.3	<b>Reject</b>  The points being raised by the submitter are supported in the proposed plan change at a broad level. The intent of the NPS-UD and PC3 include enabling intensification, which contributes to outcomes such as protecting HPL around our urban environments, and creating '20 minute communities'.
9	Marilyn & Bruce Bulloch		Scope and Background	Support in part/ Amend	Currently development onto versatile soils is resulting in reduction of options for their future use. The word "may" (third paragraph) implies a question of doubt.	Reword to: <i>Allowing urban expansion, and the development of rural residential "lifestyle blocks", onto the more versatile soils <del>may</del> results in a reduction of options for their future productive use. This <del>may</del> will adversely affect the ability of future generations to meet their reasonably foreseeable needs."</i>	9.1	<b>Accept in part</b>  I agree with the point raised in this submission. I recommend the wording of the scope and background section be amended as follows:  Allowing urban expansion and the development of rural residential "lifestyle blocks", onto the more versatile soils <del>may almost always reduces</del> result in a reduction of options for their future productive use. <del>Such reduction in options</del> This <del>may</del> adversely affects the ability of future generations to meet their reasonably foreseeable needs."

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	<b>Marilyn &amp; Bruce Bulloch</b>							The recommended wording aligns with the request through submission point 13.1 and in my view achieves the same intent sought through this submission.
			UFD-P7, Method 2, Definitions	Not stated (concern raised)	In regards to the phrase “to enable Māori to express their cultural traditions and norms”: We agree that Maori or any other cultural group should be able to undertake their cultural activities, but there needs to be limitations, especially in an urban area. Good planning rules should not be violated.	-	9.2	<b>Acknowledged</b>  No changes recommended as a result of this submission point.
<b>10</b>	<b>Manawatū District Council</b>		Whole PC3	Oppose	It appears that Horizons approach to PPC3 attempts to replicate the NPS-UD but introduce differences in terminology and structure. These are not supported as they have the potential to create unnecessary implementation challenges.	In the absence of establishing regionally specific provisions, care should be taken when RPS includes NPS-UD provisions & makes changes to these.  Amend wording match NPS-UD provisions, except where a clear regionally-specific approach is necessary.	10.1	<b>Accept in part</b>  Through development of the provisions, alignment with the NPS-UD was considered and evaluated as part of the section 32 report (section 9). The s32 report considers relying on the wording in the NPS-UD (as per the submitter’s request and concluded that the proposed provisions are “anticipated to be more effective and efficient than the alternatives”. On that basis, I am comfortable with PC3’s reliance on the NPS-UD terminology. However, as pointed out by submitters, there are inconsistencies in terminology used across some provisions of PC3.

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	Manawatū District Council							<p>I have recommended changes to align more firmly with the NPS-UD terminology used for the following provisions.</p> <p><b>UFD-O3(2)</b> enable more people to live in, and more businesses and <i>community services</i>* to be located in, areas of an <i>urban environment</i>* where: (a) it is in or near a <i>centre zone</i>* or other area with many employment opportunities, <del>or</del> (b) it is well-served by existing or planned <i>public transport</i>*, <del>or</del> (c) there is a high demand for housing or <i>business land</i>*, relative to other areas within that <i>urban environment</i>*</p> <p><b>UFD-O4</b> <i>Planning decisions</i>* <del>regarding</del> relating to <i>urban environments</i>* take into account the <u>principles of the Treaty of Waitangi (Te Tiriti o Waitangi)</u><sup>^</sup> <del>principles</del>.</p> <p><b>UFD-P1</b> <i>Territorial Authorities</i>* must proactively develop and implement appropriate <i>land</i><sup>^</sup> use strategies to manage urban growth <del>and they should aligns their <i>infrastructure</i><sup>^</sup> asset management planning with those strategies, to ensure the efficient and effective provision of associated <i>infrastructure</i><sup>^</sup> that:</del></p>

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	Manawatū District Council							<p>(1) <u>for urban environments*</u> demonstrate how <u>sufficient development capacity*</u> for housing and <u>business land*</u> will be provided in the <u>short term*</u>, <u>medium term*</u> and <u>long term*</u> in a well-planned and integrated manner, and</p> <p>(2) <u>for all settlements</u>, ensure there is co-ordination between the location, form and timing of urban growth, funding, delivery and implementation of <u>development infrastructure*</u>.</p> <p><b>UFD-P4(3)</b>  <i>District plans^</i> applying to <i>urban environments*</i> must enable heights and density of urban form which are <u>commensurate with equal to</u> the greater of:  (a) <del>demonstrated</del> <u>relative demand</u> for housing and/or business use <u>in that location</u>, or</p> <p><b>UFD-P6</b> <u>Significant development capacity* criteria for evaluating unanticipated or out of sequence development</u></p> <p>I do not support changes to UFD-O1 to apply to only urban environments. Given this objective replaces the existing RPS Objective 3-3, changes need to ensure they preserve the intent of the existing One Plan provisions (based on the scope outlined in</p>

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	Manawatū District Council							the s32 evaluation). In my view the requirements of UFD-O1, even if applied to smaller settlements are reasonable.
			Whole PC3	Amend	Drafting of the PPC3 was carried out prior to the National Policy Statement for Highly Productive Land (NPS-HPL) being finalised. We have some concerns that the directive nature of the NPS-HPL has the potential to create tension with PPC3.	The PPC3 includes elevation of NPS-HPL and considers what amendments may be appropriate at this time, considering RPS Urban form and development as a package.	10.2	<p><b>Accept in part.</b></p> <p>The ability to incorporate matters from the NPS-HPL into PC3 was discussed through a pre-hearing meeting. It is raised in a number of submissions. PC3 drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL and I don't believe there is scope within PC3 to make wholesale changes to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to identify highly productive land and give effect to the NPS-HPL. However, it is important to ensure PC3 does not conflict with the NPS-HPL. This submission and others, and discussions at the pre-hearing suggest that the use of the term versatile soils does conflict.</p> <p>In response to this and other submissions, changes are recommended to the scope and background, UFD-I2, UFD-O2, UFD-P3, UFD-PR2 and UFD-AER2 provisions of PC3 to <b>remove reference to versatile soils and replace with the NPS-HPL expression of 'highly productive land'.</b></p>

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	Manawatū District Council							These changes largely address the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing.
			UFD-P1(2)	Amend	MDC questions the approach of PPC3 to greenfield growth and intensification. While policy direction is included for both types of development, PPC3 does not sufficiently differentiate between these outcomes, as seen in UFD-P4 Urban Intensification and Expansion.	To amend UFD-P1 (2) to refer to replace “urban growth” with “Urban development.”	10.3	<b>Accept</b> I recommend amendments made to UFD-P1(2) as requested.
			UFD-P4			Split UFD-P4 into separate policy direction for intensification versus greenfield outcomes.	10.4	<b>Reject</b>  In my opinion, UFD-P4 already provides this differentiation and Method 2 provides further direction. UFD-P4(1) relates to both intensification and expansion. UFD-P4(2) provides additional criteria for urban expansion to meet in order for development to occur. I am satisfied that this provides and appropriate level of distinction between the requirements associated with greenfields growth (expansion) and intensification. In addition I consider the approach of PC3 aligns with the NPS-UD, including in relation to achieving ‘well-functioning urban environments’. Lastly, while the proposed provisions (including Method 2) do not prohibit greenfield development they do require it to be evidence based as requested by this submission.

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	Manawatū District Council		Method 2			Clarification around policy direction and meaning of Method 2- point (d).	10.5	<b>Reject</b>  Method 2(d) aligns with UFD-P1 – it emphasises the need for evidence-based decision making. Future Development Strategies and Housing and Business Development Capacity Assessments are examples. Similar, but scaled back, approaches can be used for Tier 3 urban environments.
			UFD-P4(4)	Amend	Manawatū identifies a number of instances within PPC3 that potentially creates uncertainty relative to the roles and responsibilities as set-out in legislation.	Horizons amend UFD-P4 (4) to make it clear that the “local authority transport plans and strategies” referred to in this policy are the responsibility of Horizons.	10.6	<b>Accept in part</b>  In my opinion UFD-P4(4) does not require amending. It refers to ‘local authority’ transport plans and strategies. Regional Councils are local authorities and therefore this policy applies to the transport plans that would be developed by Horizons Regional Council.  However, in response to other submission points of a similar nature, changes have been recommended to UFD-P4(1) to ensure urban development is not limited by a lack of public transport, which may still be subject to the planning process by regional council.  I recommend amending the wording of UFD-P4(1)(d) as follows:  ...

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	Manawatū District Council							Development is well serviced by existing or planned <i>development infrastructure*</i> and <u>enables provision</u> of <i>public transport*</i> , and <i>additional infrastructure*</i> required to serve the <i>development capacity*</i> is likely to be achieved,
			UFD-P7			UFD-P7 is amended to ensure alignment with RMA statutory processes.	10.7	<b>Reject</b>  In my opinion, UFD-P7 does align with RMA statutory processes, particularly with the amendments proposed to UFD-P7(2)(b) to enable papakāinga development on any land, not just Māori title.
			UFD-P5			UFD-P5 is either deleted, or amended to reflect regional outcomes.	10.8	<b>Accept in part</b>  In my opinion, there is a role for UFD-P5 in the RPS to guide plan development and decision making for urban environments. Further, other submitters have supported this policy, particularly in relation to its direction around provision of a range of housing types and densities. to make the policy clearer around roles and responsibilities, I recommend additional wording to introduce the policy and improve certainty around roles and responsibilities as follows: <u>Territorial Authorities must ensure the form and design of subdivision, use and development in <i>urban environments*</i> is managed so that</u>



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	Manawatū District Council							<ul style="list-style-type: none"> <li>(1) contributes to a <i>well-functioning urban environment*</i>,</li> <li>(2) provides for a range of housing types and densities and employment choices in a manner that integrates with existing and planned <i>development infrastructure*</i>,</li> <li>(3) recognises the importance of marae and papakāinga and enables their development, ongoing use and protection from incompatible development and reverse sensitivity adverse <i>effects*</i>, where existing or planned <i>development infrastructure*</i> of sufficient capacity is, or can be, provided, and</li> <li>(4) enables development across multiple or amalgamated <i>properties*</i> to achieve all of the above.</li> </ul>
			Methods			the methods section is updated to reflect funding and consenting of infrastructure.	10.9	<p><b>Reject</b></p> <p>The introductory text to the methods states “Many of the policies in this chapter will be implemented by the Regional Council and <i>Territorial Authorities*</i> in plan changes, <i>district plans^</i> and in decisions on <i>resource consents^</i> and designations”. I am of the view that this provide sufficient notice to users that giving effect to PC3 may also require consent under a district plan or the</p>

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	<b>Manawatū District Council</b>							regional plan. I do not believe it necessary to outline the funding mechanisms for infrastructure.
			UFD-P7	Support in part	MDC supports UFD-P7 (2)(b) that enables papakāinga housing and marae on Māori owned land. Care should be taken to not limit papakāinga housing options.	MDC seeks assurance that UFD-P7 will not limit the ability for Māori to construct papakāinga housing on land that is not held in Māori title.	10.10	<b>Accept</b>  I don't believe PC3 intended to limit the ability for Māori to construct papakāinga housing on land that is not held in Māori title. I recommended UFD-P7(2)(b) be amended as follows: ... Enables papkāinga housing and marae on Māori owned land,
		FS3. Kāinga ora		Support in part	Kāinga Ora supports provisions that enable Maori to develop their own land in a manner that supports their aspirations. Kāinga Ora however note that consistent with its own submission that papakāinga should also be provided for on general title land.	Allow in part	FS3.14	<b>Accept</b>  I recommended UFD-P7(2)(b) be amended as follows: ... Enables papkāinga housing and marae on Māori owned land,
			Whole PC3	Clarification sought	Only Feilding meets the thresholds to be classified as an urban environment. Council is unclear as to the application of PPC3 to the other urban areas and how the proposed changes work as a package of regional policy directions.	MDC seeks clarification as to how PPC3 applies to urban areas that are not classified as urban environments under the NPS-UD.	10.11	<b>Accept</b>  The scope of PC3 is limited to giving effect to the NPS-UD i.e. development of urban areas. Generally the provisions of PC3 do not apply to settlements under 10,000 people. With the exception of UFD-O1 which incorporates the principles of existing One Plan RPS Objective 3-3 which will be replaced by UFD-O1.

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	Manawatū District Council							<p>I accept that PC3 could provide greater clarity on how smaller settlements are addressed and recommend amendments to the scope and background of PC3, under the heading 'Urban development and the National Policy Statement on Urban Development 2020' as follows:</p> <p><u>"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*."</u></p>
		FS3. Kāinga ora		Support	Kāinga Ora supports separate policies and methods to address growth within urban areas that are not defined as an 'urban environment' within the NPS-UD and RPS for clarity. Noting that these areas are also subject to providing for well-functioning urban environments.	Allow	FS3.15	<p><b>Accept in part.</b></p> <p>While I do not recommend, separate policies of methods, I do recommend amendments to the scope and background section to provide more clarification of how smaller settlements apply under PC3.</p>
			UFD-P6	Amend	The heading of URD-P6 does not reflect the purpose of NPS-UD 2020 Policy 3.8(3).	The heading of URD-P6 be replaced with the following:	10.12	<p><b>Accept</b></p> <p>I recommend the heading of UFD-P6 be amended as requested</p>

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	Manawatū District Council					<i>“URD-P6 Criteria for evaluating unanticipated or out-of-sequence development”</i>		
			Issues and Objectives	Amend	These sections contain topic headings rather than resource management issues or objectives.	MDC recommends that the issues and objectives be amended.	10.13	<b>Reject</b>  The topic headings introduce the issue and objectives, and these are then elaborated on below. This is consistent with the operative One Plan.
11	Palmerston North City Council		UFD-O3	Support in part/ Amend	The NPS-UD assumes that urban environments will change over time. Needing to provide for development outcomes that relate well to the existing built environment has the potential to stymie opportunities for different development outcomes that the NPS-UD is seeking to enable.	We request that UFD-O3(1)(c) be amended to exclude <b><u>“that relates well to its surrounding environment”</u></b> .	11.1	<b>Accept</b> I recommend the wording of UFD-O3(1)(c) be amended as requested and agreed at prehearing..
		FS3.Kāinga ora		Support	Kāinga Ora supports the submission as it is in line with the NPS-UD where it is recognised that urban environments, including their amenity values, develop and change over time.		FS3.16	<b>Accept</b>  I recommend the wording of UFD-O3 be amended as requested by PNCC submission point 11.1.
			UFD-O5	Amend	If strictly interpreted, this objective could be difficult to give effect to.	That revision of this objective be made to create a clearer policy cascade, so that plan users can be clear whether the outcome intended is to reduce greenhouse gas emissions, or		11.2

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	Palmerston North City Council					whether development should be managed in a way that reduces the relative potential for generating greenhouse gas emissions.		ensure development supports reductions in greenhouse emissions. Method 2 also provides additional guidance in this respect. It was agreed the Objective does not need to go further to address this submission point. However Policy UFD-P8 does not align with UFD-O5 and therefore requires amendment to address this submission point. Parties agreed to amend UFD-P8 (discussed further under submission point 11.5).
			UFD-P1	Amend	Integration of infrastructure with land use should not be the sole responsibility of local territorial authorities. Horizons is responsible for providing flood protection infrastructure.	PNCC request that UFD-P1 be amended to recognise that Horizons also has a key role in aligning infrastructure provision with land use planning.	11.3	<b>Reject</b>  UFD-P1 relates to development infrastructure and I note the NPS-UD development infrastructure definition does not include flood protection infrastructure. I am of the view that amending UFD-P1 to try and include regional council responsibility would create an added layer of complexity and may not be appropriate given it would go beyond the NPS-UD definition for development infrastructure. Furthermore, Method 2 provides more detail on strategic planning and the various roles of regional council and territorial authorities in this. In my view consideration of existing and planned flood protection would occur as part of Future development strategies and Housing and Business Assessments for Tier 2 authorities, which Horizons is jointly responsible for preparing.

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	Palmerston North City Council							<p>I do however, consider a minor amendment to UFD-P1(2) may assist with adding more direction associated with the planning for development infrastructure, I recommend UFD-P1(2) be amended as follows:</p> <p>(2) ensure there is co-ordination between the location, form and timing of urban growth and the <u>planning</u>, funding, delivery and implementation of <i>development infrastructure</i></p> <p>I do however consider that Method 2 could address the matter raised regarding regional council infrastructure (e.g. flood protection). I recommend amendments to the wording in Method 2 (strategic planning) to include reference to regional council infrastructure as part of growth strategies as follows:</p> <p>...</p> <p>These strategies will enable decision-making to be based on sufficient information to:</p> <p>(a) coordinate the intensification of <i>urban environments*</i> and the development of extensions to <i>urban environments*</i> with <u>regional council and territorial authority infrastructure</u><sup>^</sup> planning</p>
			UFD-P2	Amend	We request that the short-medium term figures be updated to 5,046 to align with PNCC's adopted housing bottom lines		11.4	<b>Accept</b> Figures updated as requested.

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Palmerston North City Council			UFD-P4	Support in part/ Amend	The same rationale on UFD-O3 equally applies to UFD-P4(1)(b).	We request that this policy be amended to exclude reference to <b><u>“that relate well to its surrounding environment”</u></b> .	11.5	<b>Accept</b>  I recommend that UFD-P4(1)(b) be amended as requested and agreed at prehearing.
			UFD-P8	Amend	None stated but it is understood from the pre-hearing meeting that PNCC's concern that growth of any extent must involve some degree of additional greenhouse emissions (additional population, additional travel, additional construction materials, additional infrastructure provision). The wording of UFD-P8 is unclear in this regard.	None stated but it is understood from pre-hearing meetings that PNCC considers the policy should be amended to support reduction in greenhouse gas emissions (rather than to require reductions in all situations as the wording currently suggests)	11.6	<b>Accept</b>  I recommend the wording of UFD-P8 (1) be reworded as follows:  <i>Urban environments*</i> are developed in ways that <b>support reductions in reduce greenhouse gas<sup>^</sup></b> emissions and improve resilience to the <i>effects* of climate change<sup>^</sup></i> by: <ul style="list-style-type: none"> <li>(a) use of urban design, building form and <i>infrastructure<sup>^</sup></i> to minimise the contribution to <i>climate change<sup>^</sup></i> of the development and its future use, including (but not limited to) <i>energy efficiency*</i> (including methods to ensure whole-of-life <i>energy efficiency*</i>), <i>water*</i> efficiency, <i>waste*</i> minimisation, transportation modes (including use of <i>public transport*</i> and <i>active transport*</i>) water-sensitive design and nature-based solutions,</li> <li>(b) urban development being compact, well designed and sustainable, and</li> </ul>

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	Palmerston North City Council							(c) requiring best practice resilience to, the impacts of <i>climate change</i> <sup>^</sup> , including <i>sea level rise</i> * and any increases in the scale and frequency of <i>natural hazard</i> * events
12	Rangitikei District Council		Scope and Background	Amend	<p>Council recommends that this Section is updated to reflect the NPS-HPL.</p> <p>It is important that towns and settlements that don't meet the urban environment definition grow in a manner that creates well-functioning communities.</p>	That the section "Urban growth and rural residential subdivision on versatile soils" be updated in its entirety to reflect and align with the NPS-HPL.	12.1	<p><b>Accept</b></p> <p>In line with the agreements reached through pre-hearing meetings, I recommend references to 'versatile soils' in PC3 be replaced with the term 'highly productive land' and the NPS HPL definition for highly productive land be included in PC3.</p>
				Amend	<p>It is important that towns and settlements that don't meet the urban environment definition grow in a manner that creates well-functioning communities.</p>	That additional commentary is included that recognises the importance of the contribution to regional growth for towns and settlements that are growing, but are not defined as urban environments.	12.2	<p><b>Accept</b></p> <p>The scope of PC3 is limited to giving effect to the NPS-UD i.e. development of urban areas. Generally the provisions of PC3 do not apply to settlements under 10,000 people. With the exception of UFD-O1 which incorporates the principles of existing One Plan RPS Objective 3-3 which will be replaced by UFD-O1.</p> <p>I accept that PC3 could provide greater clarity on how smaller settlements are addressed and recommend amendments to the scope and background of PC3, under the heading 'Urban development and the National Policy Statement on Urban Development 2020' as follows:</p>



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	Rangitikei District Council							<p><u>"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*."</u></p>
		FS3. Kāinga ora		Support	<p>Kāinga Ora supports the inclusion of provisions that acknowledge the NPS-HPL. Kāinga Ora supports separate policies and methods to address growth within urban areas that are not defined as an 'urban environment' within the NPS-UD and RPS for clarity. Noting that these areas are also subject to providing for well-functioning urban environments.</p>	Allow	FS3.17	<p><b>Accept in part.</b></p> <p>The scope of PC3 is limited to giving effect to the NPS-UD i.e. development of urban areas. Generally the provisions of PC3 do not apply to settlements under 10,000 people. With the exception of UFD-O1 which incorporates the principles of existing One Plan RPS Objective 3-3 which will be replaced by UFD-O1.</p> <p>I accept that PC3 could provide greater clarity on how smaller settlements are addressed and recommend amendments to the scope and background of PC3, under the heading 'Urban development and the National Policy Statement on Urban Development 2020' as follows:</p> <p><u>"In addition to the urban environments listed above, the Horizons Region is characterised by a number of smaller</u></p>

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	Rangitikei District Council							settlements that are not considered ' <i>urban environments*</i> ' in the context of the NPS-UD and as defined by this Plan. <u>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 <i>urban environments*</i>.</u> "
			UFD-I1	Amend	Council suggests further consideration is given to the drafting of the issues.	Incorporate additional regional context and redrafting to focus on issue identification in UFD-I1.	12.3	<b>Reject</b>  I am of the view that UFD-I1 adequately represents the regional context required.
			UFD- I2	Amend	Council suggests further consideration is given to the drafting of the issues.	Remove or update UFD-I2 to reflect the NPS- HPL.	12.4	<b>Accept</b>  In line with the agreements reached through pre-hearing meetings, I recommend references to 'versatile soils' in PC3 be replaced with the term 'highly productive land' and the NPS HPL definition for highly productive land be included in PC3. UFD-I2 be amended as follows:  <b>UFD-I2: Adverse <i>effects*</i> from urban growth and rural residential <i>subdivision*</i> on <del>versatile soils</del> <u>highly productive land*</u></b> Urban growth and rural residential <i>subdivision*</i> ("lifestyle blocks"), on <u>highly productive land*</u> versatile soils may result in those soils no longer being available for use as production land. These development pressures often occur on the fringes of

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								some of the Region's urban areas, most notably Palmerston North.
			UFD-13	Amend	Council suggests further consideration is given to the drafting of the issues.	Incorporate additional regional context and redrafting to focus on issue identification in UFD-13	12.5	<p><b>Accept in part</b></p> <p>I recommend additional regional context be included in the scope and background of PC3 as follows:</p> <p><u>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*.</u></p> <p>I also recommend the word "in urban environments" be added to UFD-13 to provide more context that this issue relates to growth in urban environments rather than all settlements in the region. I recommend UFD-13 be amended as follows:</p> <p>"A growing population increases demand for housing, <i>business land*</i>, <i>infrastructure^</i> and <i>community services*</i>. Growth <b>in urban environments*</b> needs to be provided for in a way that contributes to <i>well-functioning urban environments*</i>, is...."</p>

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	Rangitikei District Council		Objectives and Policies	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS.	Remove all objectives and policies related to versatile land, or make amendments to ensure alignment with the NPS-HPL.	12.6	<p><b>Accept in part</b></p> <p>The ability to incorporate matters from the NPS-HPL into PC3 was discussed through a pre-hearing meeting. It is raised in a number of submissions. PC3 drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL and I don't believe there is scope within PC3 to make wholesale changes to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to identify highly productive land and give effect to the NPS-HPL. However, it is important to ensure PC3 does not conflict with the NPS-HPL. This submission and others, and discussions at the pre-hearing suggest that the use of the term versatile soils does conflict.</p> <p>In response to this and other submissions, changes are recommended to the scope and background, UFD-I2, UFD-O2, UFD-P3, UFD-PR2 and UFD-AER2 provisions of PC3 to <b>remove reference to versatile soils and replace with the NPS-HPL expression of 'highly productive land'</b>.</p> <p>These changes largely address the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing.</p>

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	Rangitikei District Council		Objectives and Policies	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS	Where a provision is duplicating, or slightly amending provisions from the NPS-UD, without a specific regional outcome in mind, that the provision is amended to cross reference the NPS-UD. Or alternatively the provision is amended to reflect/incorporate a specific regional outcome.	12.7	<p><b>Accept in part</b></p> <p>Through development of the provisions, alignment with the NPS-UD was considered and evaluated as part of the section 32 report (section 9). The s32 report considers relying on the wording in the NPS-UD (as per the submitter's request and concluded that the proposed provisions are "anticipated to be more effective and efficient than the alternatives". On that basis, I am comfortable with PC3's reliance on the NPS-UD terminology. However, as pointed out by submitters, there are inconsistencies in terminology used across some provisions of PC3.</p> <p>I have recommended changes to align more firmly with the NPS-UD terminology used for the following provisions.</p> <p><b>UFD-O3(2)</b> enable more people to live in, and more businesses and <i>community services*</i> to be located in, areas of an <i>urban environment*</i> where: (a) it is in or near a <i>centre zone*</i> or other area with many employment opportunities, <del>or</del> (b) it is well-serviced by existing or planned <i>public transport*</i>, <del>or</del></p>

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	Rangitikei District Council							<p>(c) there is a high demand for housing or <i>business land</i>*, relative to other areas within that <i>urban environment</i>*</p> <p><b>UFD-O4</b>  <del>Planning decisions* regarding</del> relating to <i>urban environments</i>* take into account the principles of the <i>Treaty of Waitangi (Te Tiriti o Waitangi)</i>^ principles.</p> <p><b>UFD-P1(1)</b>  <i>Territorial Authorities</i>* must proactively develop and implement appropriate <i>land</i>^ use strategies to manage urban growth and they should aligns their <i>infrastructure</i>^ asset management planning with those strategies, to ensure the efficient and effective provision of associated <i>infrastructure</i>^ that:</p> <p>(3) <u>for <i>urban environments</i>*</u> demonstrate how <i>sufficient development capacity</i>* for housing and <i>business land</i>* will be provided in the <i>short term</i>*, <i>medium term</i>* and <i>long term</i>* in a well-planned and integrated manner, and</p> <p>(4) <u>for all settlements</u>, ensure there is co-ordination between the location, form and timing of urban growth, funding, delivery and implementation of <i>development infrastructure</i>*.</p> <p><b>UFD-P4(3)</b></p>

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	Rangitikei District Council							<p><i>District plans<sup>^</sup> applying to urban environments* must enable heights and density of urban form which are commensurate with equal to the greater of:</i></p> <p><i>(a) <del>demonstrated</del> relative demand for housing and/or business use in that location, or</i></p> <p><b>UFD-P6 Significant <i>development capacity*</i> criteria for evaluating unanticipated or out of sequence development</b></p>
			UFD-P1	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS	Amend the wording of UFD-P1 to replace the word must, with a less stringent alternative (e.g. should consider the value in).	12.8	<p><b>Reject</b></p> <p>The existing operative One Plan provision Policy 3-4 states that “TAs must proactively develop and implement appropriate land<sup>^</sup> use strategies to manage urban growth...”. UFD-P1 replaces Policy 3-4 in part and creating more leniency in UFD-P1 would weaken the intent of the current provisions which was not the intent of PC3.</p>
			UFD-P4(1)(d)	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS	Reconsider the drafting of all objectives and policies to remove references to matters that are largely the function of territorial authorities in UFD-P4(1)(d) and recognise that rural towns and settlements do not have access to reliable public transport.	12.9	<p><b>Accept in part</b></p> <p>In response to matters raised in other submissions amendments have been recommended to UFD-P4(1) to remove the risk of this Policy being interpreted in a way that forecloses urban development because public transport is not already in place. Provision of public transport is the responsibility of regional council. Public</p>

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	Rangitikei District Council							<p>transport planning and implementation is guided by the Regional Public Transport Plan and is subject to a separate planning and funding process. The key requirement is that public transport is able to be implemented as part of any intensification or expansion of the urban environment.</p> <p>I recommend amending the wording of <b>UFD-P4(1)(d)</b> as follows:</p> <p>...</p> <p>Development is well serviced by existing or planned <i>development infrastructure*</i> and <u>enables provision</u> of <i>public transport*</i>, and <i>additional infrastructure*</i> required to serve the <i>development capacity*</i> is likely to be achieved,</p>
			UFD-P4(1)(b)	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS	Reconsider the drafting of all objectives and policies to remove references to matters that are largely the function of territorial authorities in UFD-P4(1)(b)), and recognise that rural towns and settlements do not have access to reliable public transport.	12.10	<p><b>Accept in part</b></p> <p>Amendments have been made to the scope and background, UFD-O3, UFD-P1, UFD-P4, and Method 2 in response to this and other submission to clarify roles and recognise that small settlements often do not have access to public transport.</p>
			UFD-P4	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS. Council suggests a number of amendments we consider	Split UFD-P4 into two policies, one focused on expansion and the other on intensification. This will support each policy being tailored to consider the appropriate matters for each	12.11	<p><b>Reject</b></p> <p>In my opinion, UFD-P4 already provides this differentiation and Method 2 provides further direction. UFD-P4(1) relates to both intensification and expansion. UFD-P4(2)</p>



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	Rangitikei District Council				would improve implementation of the RPS	approach, as these are quite different. Recognise that both expansion and intensification will be necessary in the Horizons context to meet regional growth aspirations.		provides additional criteria for urban expansion to meet in order for development to occur. I am satisfied that this provides an appropriate level of distinction between the requirements associated with greenfields growth (expansion) and intensification. In addition I consider the approach of PC3 aligns with the NPS-UD, including in relation to achieving 'well-functioning urban environments'. Lastly, while the proposed provisions (including Method 2) do not prohibit greenfield development they do require it to be evidence based as requested by this submission.
			UFD-P7	Amend	Council suggests a number of amendments we consider would improve implementation of the RPS	Reconsider the drafting of UFD-P7 to not restrict application to urban environments, recognise that papakāinga may not always be on Māori owned land and recognises wider economic development needs for business environments.	12.13	<b>Accept in part.</b>  I don't believe PC3 intended to limit the ability for Māori to construct papakāinga housing on land that is not held in Māori title. I recommended UFD-P7(2)(b) be amended as follows: ... Enables papkāinga housing and marae on Māori owned land
		FS3. Kāinga ora		Support	Kāinga Ora supports provisions that enable Maori to develop their own land which is consistent with its own submission.	Allow	FS3.18	<b>Accept</b>  I recommend amendments be made to UFD-P7 to enable papakāinga development on all land.

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Rangitikei District Council			Methods	Amend	Council suggests consideration is given to adding clarity on the responsibilities and the intentions of the Regional Council in each of the methods.	That the roles and responsibilities of the Regional Council and territorial authorities are clarified in each method.	12.14	<b>Reject</b>  While the intent of this request is acknowledged, I am of the opinion that to define the specific roles and responsibilities of the regional council and territorial authorities would not align with the wider approach of the One Plan. I am satisfied that the current approach provides sufficient direction on who is responsible.
			Methods	Amend		That the Regional Council commits to the commissioning of natural hazard information required to ensure the effective planning our towns and settlements in the Rangitikei.	12.15	<b>Reject</b>  This is a very specific request that in my opinion is not appropriate to address through a RPS method for urban development. I believe this is something that should be addressed as part of the long term plan process and potentially sits under Chapter 9 of the RPS.
			Methods	Amend		That the methods are refined to remove reference to specific actions, as there is likely to be a diversity of approaches suitable across the region.	12.16	<b>Reject</b>  The methods provide guidance and examples. There would be a lack of direction if these were all to be removed.

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	Rangitikei District Council		Methods	Amend		That greater acknowledgement is given to the role Horizons plays in consenting infrastructure projects, and consideration is given to how the wider One Plan operates in relation to consenting infrastructure projects that support urban growth.	12.17	<b>Reject</b>  In my opinion, including detail or guidance in PC3 about regional council consenting pathways for water, wastewater and stormwater goes beyond the scope of this RPS change as defined in the s32. Water abstraction, discharges and development of this kind of infrastructure is addressed through Chapter 5 of the RPS and varying chapters of the Regional Plan which determine when a consent is required. In my view, to include guidance within PC3 policies as sought, would require more analysis to ensure it did not impact or frustrate these other chapters of the One Plan
			Principal Reasons	Amend	Once amendments are made to the issues, this section will also need to be updated.	That the principal reasons are updated to align with changes made to the issues, or other amendments made to the wider provisions associated with this plan change.	12.18	<b>Accept</b>  Consequential amendments have been made to UFD-PR2 as a result of other amendments to PC3.
			UFD-PR2	Amend		Remove or update UFD-PR2 to reflect/align with the NPS-HPL.	12.19	<b>Accept</b>  I recommend UFD-PR2 be amended as requested.  UFD-PR2: Urban growth and rural residential <i>subdivision*</i> on <u>highly productive land*</u> <del>versatile soils</del>

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	Rangitikei District Council		Anticipated Environmental Outcomes	Amend	Council recommends that these are reviewed once amendments are made to the wider provisions to ensure alignment.	That the anticipated environmental results are reviewed to ensure alignment with the wider chapter.	12.20	<b>Accept</b>  Consequential amendments have been made to UFD-AER2 as a result of other amendments to PC3.
			Definitions	Amend	Council suggest only referencing the NPS-UD (rather than copying the wording) to future proof against possible updates to the definitions in the NPS-UD.		12.21	<b>Reject</b>  Recent Plan Amendments completed by Horizons copy the wording from the relevant source in to the One Plan definitions. PA3 which will align the One Plan to National Planning standards also follows this approach. For the sake of consistency with other parts of the One Plan, I recommend keeping the approach in the notified version of PC3.
13	Dr Chris Teo-Sherrell		Scope and Background	Amend	The statement concerning the impact of urban expansion and lifestyle blocks on the potential future use of versatile soils is inadequate. The word 'may' is technically correct but does not reflect the reality that in the vast majority of cases such land use <u>does</u> reduce options for their future productive use.	Reword to: Allowing urban expansion, and the development of rural residential “lifestyle blocks”, onto the more versatile soils <del>may almost always results in a reduction of</del> <u>reduces</u> options for their future productive use. <del>This may</del> <u>Such reduction in options</u> adversely affects the ability of future generations to meet their reasonably foreseeable needs.”	13.1	<b>Accept</b>  I recommend the scope and background wording be amended as requested.
			UFD-I2	Amend	Same rationale as above.	Reword to: Urban growth and rural residential subdivision* (“lifestyle blocks”), on versatile	13.2	<b>Accept</b>  I recommend the wording of UFD-I2 be amended as requested.

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	Dr Chris Teo-Sherrell					soils <del>may</del> almost always results in those soils no longer being available for use as production land. These development pressures often occur on the fringes of some of the Region's urban areas, <del>most notably Palmerston North.</del>		
			UFD-O2	Amend	UFD-O2 on p4 is not strong enough in my view. Versatile soils, especially those close to urban areas are of immense value from a sustainability and resilience perspective.	Change to read: To ensure that Territorial Authorities* consider the benefits of retaining Class I and II <sup>1</sup> versatile soils <sup>2</sup> for use as production land* when providing for urban growth and rural residential subdivision* <u>and give it a weighting in decision making that would only see it used for urban growth or rural residential purposes in the most exceptional of circumstances.</u>	13.3	<b>Reject</b>  It is my view that the requested changes seek to address the requirements of the NPS-HPL by constraining the use of highly productive land. PC3 was drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL and I don't believe there is scope for wholesale changes to attempt to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to give effect to the NPS-HPL and the requested changes should be tested through that process.  However, in response to other submissions, changes are recommended to UFD-O2 to <b>remove reference to 'versatile soils' and replace with the NPS-HPL definition of 'highly productive land'</b> . This change partially addresses the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already).

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	Dr Chris Teo-Sherrell		UFD-P3	Amend	Same rationale as above.	Change to read as: In providing for urban growth (including implementing Policy 3-4), and controlling rural residential subdivision* (“lifestyle blocks”), Territorial Authorities* must pay particular attention to the benefits of the retention of Class I and II versatile soils for use as production land^ in their assessment of how best to achieve sustainable management <u>and give it a weighting in decision making that would only see it used for urban growth or rural residential purposes in the most exceptional of circumstances.</u>	13.4	<b>Reject</b>  For the reasons above. The NPS-HPL which applies separately directs the same outcome as sought. However to include this wording as part of PC3 , would in my opinion be beyond the scope of PC3, and should also be tested through the separate plan change process to give effect to the NPS-HPL (yet to be commenced by Council)
			UFD-P4(2)	Amend	I would also like to see the protection of versatile soils mandated.	Addition to policy: <u>(e) avoids using versatile soils except in the most exceptional of circumstances.</u>	13.5	<b>Reject</b>  For the reasons above under 13.3 and 13.4.
			UFD-P8(2)(a)	Amend	Future development should be putting public transport and active transport ahead of transport by motor car, whether internal combustion- or electrically-powered, to achieve liveability and sustainability objectives.	Territorial Authority* decisions and controls: (a) on subdivision* and land* use must ensure that sustainable transport options such as public transport*, walking and cycling <del>can be</del> are integrated into land* use development, and	13.6	<b>Accept</b>  I recommend amending the wording of UFD-P8(2)(a) as requested.

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14	Fonterra Ltd		UFD-O3	Support with amendment	The provision of sufficient development capacity of business land through intensification and expansion is a critical element of a well-functioning urban environment and is consistent with the provisions of the NPS-UD. This is currently absent from UFD-O3. Fonterra's proposed amendments give effect to the NPS-UD.	Amend UFD-O3(1) to read as follows: <i>The intensification and expansion of urban environments:</i> <i>(1) contributes to well-functioning urban environments that:</i> <i>(b) increase <u>the capacity and choice available within housing and business land capacity and housing choice,</u></i>	14.1	<b>Accept</b>  I recommend the wording of UFD-O3(1)(b) be amended as requested.
			UFD-P4	Support with amendment	As above. The first part of UFD-P4 also does not explicitly relate to business land.	Amend UFD-P4(1) to read as follows: <i>(1) Intensification and expansion of urban environments* is provided for and enabled in district plans^ where:</i> <i>(bb) it provides for a range of <u>business land that enable different business types, site* size and densities that relate well to the surrounding environment,</u></i>	14.2	<b>Accept with amendments</b>  While I support including business land, in my opinion it can be inserted into UFD-P4(1)(b) and does not require its own line as suggested by Fonterra. I recommend UFD-P4(1)(b) be amended as follows: (1) Intensification and expansion of <i>urban environments*</i> is provided for and enabled in <i>district plans^</i> where:  (b) It provides for a range of residential <u>and business</u> areas that enable different housing <u>and business</u> types, <i>site*</i> size and densities that relate well to the surrounding environment,

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	Fonterra Ltd		UFD-P8	Support with amendment	Fonterra notes that there are many varied and complex drivers for urban land development design, and it is appropriate that effects on climate change are able to be taken into account alongside other drivers.	Amend UFD-P8(1) to read as follows: <i>(1) Urban environments* are developed in ways that reduce greenhouse gas^ emissions and improve resilience to the effects* of climate change^ by: (a) use of urban design, building form and infrastructure^ to minimise, as far as reasonably practicable, the contribution to climate change^ of the development and its future use, including (but not limited to) energy efficiency* (including methods to ensure whole-of-life energy efficiency*), water* efficiency, waste* minimisation, transportation modes (including use of public transport* and active transport*) water sensitive design and nature-based solutions,</i>	14.3	<b>Reject</b>  I am of the view that 'minimise' is understood in other NZ jurisdictions (e.g. Southland Water and Land Plan endorsed by the Environment Court) to mean 'reduce to the lowest practicable extent'. On that basis, I do not consider the additional wording requested through this submission point to be necessary.



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	Fonterra Ltd		UFD-O2		<p>The existing objective and policy do not reflect the provisions which have since been introduced to national policy direction via the NPS-HPL and could potentially lead to conflict between the RPS and NPS-HPL.</p> <p>Fonterra therefore seek amendment to UFD-O2 and UFD-P3 to change references to versatile soils to be highly productive land as per the NPS HPL.</p>	<p>Amend UFD-O2 to read as follows:  <i>To ensure that Territorial Authorities consider the benefits of retaining <u>Highly Productive Land</u>* <del>Class I and II versatile soils</del> for use as production land when providing for urban growth and rural residential subdivision*.</i></p>	14.4	<p><b>Accept</b></p> <p>Wording amended as requested.</p>
			UFD-P3	Support with amendment	<p>The existing objective and policy do not reflect the provisions which have since been introduced to national policy direction via the NPS-HPL and could potentially lead to conflict between the RPS and NPS-HPL.</p> <p>Fonterra therefore seek amendment to UFD-O2 and UFD-P3 to change references to versatile soils to be highly productive land as per the NPS HPL.</p>	<p>Amend UFD-P3 to read as follows:  <i>In providing for urban growth, and controlling rural residential subdivision* (“lifestyle blocks”), Territorial Authorities* must pay particular attention to the benefits of the retention of <u>Highly Productive Land</u> <del>Class I and II versatile soils</del> for use as production land^ in their assessment of how best to achieve sustainable management.</i></p>	14.5	<p><b>Accept</b></p> <p>Wording amended as requested.</p>

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	Fonterra Ltd		Glossary	Amend	<p>The existing objective and policy do not reflect the provisions which have since been introduced to national policy direction via the NPS-HPL and could potentially lead to conflict between the RPS and NPS-HPL.</p> <p>Fonterra therefore seek amendment to UFD-O2 and UFD-P3 to change references to versatile soils to be highly productive land as per the NPS HPL.</p>	Add the following to the glossary of PC3: <u>Highly Productive Land: has the same meaning as in the National Policy Statement for Highly Productive Land 2022</u>	14.6	<b>Accept</b>  Definition added as requested.
15	New Zealand Defence Force		UFD-I3	Amend	<p>Development must be appropriately located and designed in relation to established infrastructure, and needs to be managed in a way that avoids effects on regionally or nationally significant infrastructure. The existing provisions of the RPS appropriately provide for this approach. However there is no connection between these existing RPS provisions and PC3.</p> <p>While acknowledging the constraints on a more fulsome review, NZDF notes there is no certainty regarding</p>	Amend to include: A growing population increases demand for housing, business land*, infrastructure^ and community services*. Growth needs to be provided for in a way that contributes to well-functioning urban environments*, is integrated with infrastructure^ planning and funding decisions, manages effects* on the urban and natural environment <u>and on infrastructure and physical resources of regional or national importance</u> , and improves resilience to the effects* of climate change^.	15.1	<b>Reject</b>  The existing wording in the scope and background section of Chapter 3 (under the heading 'infrastructure and other physical resources of regional or national importance') provides for reverse sensitivity effects on infrastructure of regional or national importance. This part of Chapter 3 is not proposed to change as part of PC3.  I am therefore satisfied that management of reverse sensitivity on regionally and nationally important infrastructure is already provided for through the One Plan.
			UFD-O3	Amend	there is no certainty regarding	Amend to include:	15.2	<b>Accept</b>

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	New Zealand Defence Force				the scope or timing of a future review to ensure greater integration between existing and proposed RPS provisions. In the interim, further clarity is required on the relationship between PC3 and existing RPS provisions.	The intensification and expansion of urban environments*: (1) contributes to well-functioning urban environments* that <u>(e) protects infrastructure and physical resources of regional or national importance and provides for its ongoing operation, and</u>		With the replacement of existing Objective 3-3 as part of PC3, I think it is appropriate that UFD-O3 refer to infrastructure of regional and national importance which is then addressed by Policy 3-1 & 3-2 of the One Plan (noting that Policy 3-1 and 3-2 are not proposed to change as part of PC3).
			UFD-P4	Amend		Amend to include: (2) In addition to meeting the criteria in (1) above, the expansion of urban environments* must only occur where it: (d) manages adverse reverse sensitivity effects* on land with existing incompatible activities adjacent to the urban environment* boundary, <u>and avoids adverse effects, including reverse sensitivity effects, on infrastructure and resources of regional or national importance.</u>	15.3	<b>Reject</b>  Through pre-hearings it was agreed that the NPS-UD definition for nationally significant infrastructure would be included as part of PC3. This definition aligns with the NPS-ET, however it does not extend to NDDF facilities.  Existing One Plan Policy 3-1 defines infrastructure and facilities and assets (which includes NZDF facilities) of regional and national <u>importance</u> . Policy 3-2 provides direction for managing activities that may affect this infrastructure or these facilities. Policies 3-1 and 3-2 remain in effect and must still be considered as part of any development. I am therefore satisfied that UFD-P4 does not need to include reference to infrastructure of regional or national importance.

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16	Robert McLachlan		Whole PC3	Support	I support the move to urban intensification, more compact urban forms, prevention of urban sprawl, and reducing greenhouse gas emissions. Greenfields development should only be allowed in tiny quantities and only then when we have shown that we are able to set in motion steadily decreasing greenhouse gas emissions.	-	16.1	<b>Accept</b>  The wording proposed through notification and amendments proposed through this s42A report address the comments in this submission.
17	Kāinga Ora-Homes and Communities		UFD-05	Support in part	Kāinga Ora supports this policy but seeks further expansion to make the objective clearer and directive.	Change to: <i><u>Regional and district plans contribute to the region being <del>Urban environments</del>* resilient to the effects* of climate change^ and support reductions in greenhouse gas^ emissions, and where climate change mitigation is an integral part of well-functioning urban environments* and rural areas.</u></i>	17.1	<b>Reject</b>  The current wording of this Objective aligns strongly with the wording in Objective 8 and Policy 1(f) of the NPS-UD. In my view UFD-05 is sufficient in its intent. Including reference to Regional and District Plans does not add certainty to the Objective.  The requested changes to incorporate climate change mitigation as a part of well-functioning urban environments and rural areas also goes beyond what is specified in the NPS-UD. While mitigation is a key part of resilience and greenhouse gas emissions, it is not the only method for achieving this outcome. I therefore consider it unnecessarily prescriptive to reference this in UFD-05. Lastly, the reference to rural areas is not supported as this Objective only relates to urban environments. In my view expanding it to include rural environments,

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	Kāinga Ora-Homes and Communities							goes beyond the scope of PC3 and the NPS-UD.
			UFD-P2	Support in part	Kāinga Ora seek that Levin is included in the housing bottom line table under UFD-P2. Although Horowhenua District Council is a Tier 3 Council under the NPS-UD, the projected growth in Levin (to support the Wellington Regional Growth Framework) is more akin to a Tier 1 or 2 Council.	Change to: <i>(3) ensuring the urban intensification and expansion necessary to meet the housing bottom lines* specified in Table X is provided for in the Palmerston North District Plan and the Horowhenua District Plan.</i>	17.2	<b>Reject</b>  In general I don't support this as it is not required by the NPS-UD and goes beyond the scope of PC3 as outlined in the s32 evaluation. No evidence has been compiled to justify a more stringent approach than the NPS-UD. However there is a case to be made for Horowhenua (specifically Levin) given they have been included in the Wellington-Wairarapa-Horowhenua Future Development Strategy and have completed a Housing and Business Capacity Assessment part of this process.  Contact has been made with Horowhenua District Council to seek their views on including housing bottom lines for Levin in UFD-P2, however a determination had not been made at the time of writing this evidence. I am prepared to revise my position on this submission point, should evidence from Horowhenua District Council agree to include housing bottom lines for Levin in PC3.

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Kāinga Ora-Homes and Communities			UFD-P4(2)(d)	Support in part	Kāinga Ora supports this policy but seeks that Regional Council specify which land and activities this policy pertains to. In this instance, rural land should be protected from reverse sensitivity effects, as the Horizon's Region has a lot of valuable productive land.	Change to: <i>(d) manages adverse reverse sensitivity effects* <u>from out of sequence development on land with existing incompatible activities adjacent to the urban environment* boundary rural or open space land valued for its productive, ecological, aesthetic and recreational qualities.</u></i>	17.3	<b>Reject</b>  In my opinion, adverse reverse sensitivity effects should be managed in all cases (not only for out of sequence development).
			UFD-P4(1)(d)	Support in part	Kāinga Ora supports this policy but seeks additional wording to be included to: - require the incorporation of equality in accessible transportation options that provide public transport options for all, and - align with the wording of the NPS-UD.	Change to: <i>UFD-P4: Urban intensification and expansion. 1. d) development is <u>well adequately</u> serviced by existing or planned development infrastructure* and <u>equitable public transport*</u>, and additional infrastructure* required to service the development capacity* is likely to be achieved.</i>	17.4	<b>Reject</b>  Provision of equitable public transport, in my view, is the role of regional council and is addressed through the Regional Land Transport Plan (at a high level) and more specifically through the Regional Public Transport Plan. I do not consider it necessary to place the onus on a district plan to provide equitable public transport. Rather the focus should be on enabling public transport to be provided (i.e. ensuring development can accommodate public transport).
			UFD-P5	Support in part	Kāinga Ora seeks additional wording to enable papakāinga development in urban areas, reduce any ambiguity for those district/city plan provisions and recognise that the diverse need for housing typologies and layouts.	Change to: <i>The form and design of subdivision, use and development in urban environments* is managed so that it: <u>(4) Promotes papakāinga in urban settings by providing plan enabled urban papakāinga, including on general title land.</u></i>	17.5	<b>Reject</b>  In my opinion PC3 adequately enables papakāinga development in urban environments through UFD-P5 and UFD-P7. UFD-P5(2) states a 'range of housing types and densities, under which papakāinga can be enabled. UFD-P7 focuses on enabling iwi and hapū involvement in urban development to ensure Maori are able to

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	Kāinga Ora-Homes and Communities							express their cultural traditions and norms. It also requires land use strategies to enable papakāinga housing and marae.  In relation to enabling papakāinga on general title land (as sought by this submission point), I agree. This has been raised through other submissions and I have recommended UFD-P7(2)(b) remove the wording “on Māori owned land”.
			UFD-P8(1)	Support in part	Kāinga Ora considers that this policy needs to refer to a definition for “best practice resilience” and a definition of best practice is introduced as this term is currently ambiguous.	Definitions to be added to One Plan as below: <u><i>Best practice resilience - has the same meaning as in the Glossary of terms in Appendix 1 of the National Adaption Plan 2022 (as set out below): means the capacity of interconnected social, economic and ecological systems to cope with a hazardous event, trend or disturbance, by responding or reorganising in ways that maintain their essential function, identity and structure. Resilience is a positive attribute when it allows systems to maintain their capacity to adapt, learn and/or transform.</i></u>	17.6	<b>Accept in part.</b>  I agree that it is unclear what is meant by best practice resilience. In analysing the policy further I consider the words ‘best practice’ should be removed from UFD-P8(1)(c) as they add unnecessary detail, create uncertainty and go beyond the intent of the NPS-UD. I recommend UFD-P8(1)(c) be amended as follows:  Urban environments* are developed in ways that reduce greenhouse gas^ emissions and improve resilience to the effects* of climate change^ by: a.. b.. c. requiring best practice resilience to, the impacts of climate change^, including sea level rise* and any increases in the scale and frequency of natural hazard* events.

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	Kāinga Ora-Homes and Communities		Method 1	Support in part	The RPS should be amended to require that a Housing and Business Development Capacity Assessments and Future Development Strategies be prepared for Levin.	Change to: <i>This includes a requirement for the Regional Council, <del>and</del> Palmerston North City Council and Horowhenua District Council to jointly prepare and publish Housing and Business Development Capacity Assessments* and Future Development Strategies*</i>	17.7	<p><b>Accept with amendments</b></p> <p>Horowhenua District Council has been incorporated within the Wellington-Wairarapa-Horowhenua Future Development Strategy. An HBA was for Levin was completed in August 2023 and has formed part of the information supporting the Wellington-Wairarapa-Horowhenua FDS.</p> <p>On that basis, I see no reason why Method 1 should not be updated to include Horowhenua District Council as requested by this submitter. The only amendment I suggest is including reference to the Wellington Regional Leadership Committee as they have jointly prepared this FDS rather than Horizons Regional Council</p> <p>I recommend Method 1 be amended as follows: This includes a requirement for the Regional Council, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council (with Wellington Regional Leadership Committee)</u> to jointly prepare and publish Housing and Business Development Capacity Assessments* and Future Development Strategies.</p>
			Method 2	Support in part	The RPS should be amended to require that a Housing and Business Development Capacity Assessments and	Change to: <i>The aim of this method is to undertake strategic planning to meet the objectives and policies</i>	17.8	<p><b>Accept with amendments</b></p> <p>Horowhenua District Council has been incorporated within the Wellington-</p>



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	Kāinga Ora-Homes and Communities				Future Development Strategies are prepared for Levin.	<p><i>of this Chapter. The Regional Council, together with, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council</u>, will determine housing development capacity* that is feasible* and likely to be taken up in short term*, medium term*, and long term* through Housing and Business Development Capacity Assessments*.</i></p> <p><i>In addition, the Regional Council, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council</u> will jointly prepare Future Development Strategies*.</i></p>		<p>Wairarapa-Horowhenua Future Development Strategy. An HBA was for Levin was completed in August 2023 and has formed part of the information supporting the Wellington-Wairarapa-Horowhenua FDS.</p> <p>On that basis, I see no reason why Method 2 should not be updated to include Horowhenua District Council as requested by this submitter. The only amendment I suggest is including reference to the Wellington Regional Leadership Committee as they have jointly prepared this FDS rather than Horizons Regional Council</p> <p>I recommend Method 2 be amended as follows:</p> <p>The aim of this method is to undertake strategic planning to meet the objectives and policies of this Chapter. The Regional Council, together with, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council (through the Wellington Regional Leadership Committee)</u>, will determine housing development capacity* that is feasible* and likely to be taken up in short term*, medium term*, and long term* through Housing and Business Development Capacity Assessments*.</p> <p>In addition, the Regional Council, <del>and</del> Palmerston North City Council <u>and Horowhenua District Council (through the Wellington Regional Leadership Committee)</u></p>

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	Kāinga Ora-Homes and Communities							will jointly prepare Future Development Strategies*.
			Method 4	Support in part	Meaningful advocacy requires consultation and partnership, Kāinga Ora request that Method 4 is amended to reflect this and look forward to working closely with Council.	Change to: <i>Where appropriate, the Regional Council will <u>consult on and</u> advocate the objectives and policies in this chapter to external agencies that contribute to shaping urban form and development, such as Kāinga Ora.</i>	17.9	<p><b>Accept with amendments</b></p> <p>Consultation on the objectives and policies in this chapter has already occurred through the schedule 1 process of PC3. I can't foresee a scenario where Council would consult on these objectives and policies again, unless they were to be changed, in which case a Schedule 1 process would be followed.</p> <p>The intention of this method is to ensure all relevant parties are aware of the requirements of this chapter. In my view the word 'promote' is a better balance between what the submitter is seeking and what this method can realistically achieve.</p> <p>I recommend Method 4 be amended as follows: <i>Where appropriate, the Regional Council will <u>promote and</u> advocate the objectives and policies in this chapter to external agencies that contribute to shaping urban form and development, such as Kāinga Ora.</i></p>
18	Philip Lake		UFD-O3 UFD-P4 UFD-P8 Method 2 Method 4	Amend	There are a number of provisions related to development linked to public transport when there is barely any public transport in this Region - it is almost entirely	Insert much stronger links between public transport planning and the One Plan (and Spatial Plans, District Plans and subdivision consents).	18.1	<p><b>Reject</b></p> <p>The submission appears to be raising concerns about methods to improve public transport. These are discussed in 'Method 2'. Method 2 references the Regional Public</p>

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	Philip Lake				<p>focused in Whanganui and Palmerston North. Public transport improvements need to be implemented.</p> <p>Horizons should be collaborating with neighbouring Regional Councils and lobbying government for funding and assistance to implement public transport services.</p>			<p>Transport Plan, which is the tool for providing greater detail planning and provision of public transport. Funding is addressed through the Regional Land Transport and Long Term Planning processes. Horizons (through the Transport Team) does collaborate with district councils and neighbouring regional councils as part of public transport service reviews (usually with the formation of governance groups) and through public notification of any reviews of their public transport services or plans. Because transport planning is managed separately through the Land Transport Management Act I do not consider it appropriate for advocacy and coordinated planning of public transport to be dealt with by PC3.</p>
19	National Public Health: MidCentral, Te Whatu Ora, Health New Zealand.		UFD-O2	Amend	<p>We think that the phrase 'consider the benefits of retaining class I and II soils' needs a stronger word than consider.</p>	<p>Amend this provision as follows: To ensure that Territorial Authorities give due consideration to the benefits of retaining class I and II soils.</p>	19.1	<p><b>Accept in part.</b></p> <p>In response to this and other submissions, changes are recommended to the scope and background UFD-O2 <b>to remove reference to versatile soils and replace with the NPS-HPL expression of 'highly productive land'</b>.</p> <p>These changes largely addresses the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing.</p>

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	National Public Health: MidCentral, Te Whatu Ora, Health New Zealand.		UFD-O3	Amend	We wish to include active transport under section UFD-03 (2)(b). Active transport is accessible and well connected by a choice of transport modes including walking, cycling and public transport.	Under UFD-03 (2)(b) add the suggested words “and includes options that encourage active transport”.	19.2	<p><b>Accept in part</b></p> <p>Method 2 details how active transport is to be provided for and gives effect to UFD-03. For that reason, I don’t recommend including the word ‘encourage’ but accept that UFD-03(2)(b) could be more explicit about provision of active transport for urban expansion or intensification.</p> <p>I recommend UFD-03(2)(b) be amended as follows:</p> <p>...</p> <p>It is well-serviced by existing or planned public transport <u>and active transport</u>, or...</p>
			UFD-P2	Amend	<p>Part of Urban Intensification relates to the loss of green spaces such as the traditional back yard. To compensate for this it is essential that communal green spaces are provided.</p> <p>We note that housing bottom lines are included for Tier 2 local authorities such as Palmerston North City Council. We support a similar approach for tier 3 local authorities as per Clause 1.5 of the NPS Urban Development.</p>	<p>It is essential that communal green spaces are included any urban intensification planning.</p> <p>With regard to housing bottom lines, a similar approach is suggested for tier 3 local authorities.</p>	19.3	<p><b>Reject</b></p> <p>In general I don’t support this as it is not required by the NPS-UD and goes beyond the scope of PC3 as outlined in the s32 evaluation. No evidence has been compiled to justify a more stringent approach than the NPS-UD. However there is a case to be made for Horowhenua (specifically Levin) given they have been included in the Wellington-Wairarapa-Horowhenua Future Development Strategy and have completed a Housing and Business Capacity Assessment part of this process.</p> <p>Contact has been made with Horowhenua District Council to seek their views on including housing bottom lines for Levin in</p>

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	National Public Health: MidCentral, Te Whatu Ora, Health New Zealand							UFD-P2, however a determination had not been made at the time of writing this evidence. I am prepared to revise my position on this submission point, should evidence from Horowhenua District Council agree to include housing bottom lines for Levin in PC3.
			UFD-P3	Neutral	We suggest that this and other relevant parts of the Urban Development Plan Change (PC3) are cross-referenced to the NPS-HPL 2022.	Cross reference this policy to the NPS-HPL.	19.4	<p><b>Accept in part</b></p> <p>The ability to incorporate matters from the NPS-HPL into PC3 was discussed through a pre-hearing meeting. It is raised in a number of submissions. PC3 drafted before the NPS-HPL was gazetted and is therefore silent on the NPS-HPL obligations. PC3 was not intended to give effect to the NPS-HPL and I don't believe there is scope within PC3 to make wholesale changes to give effect to the NPS-HPL. There is a separate body of work to be undertaken by Horizons to identify highly productive land and give effect to the NPS-HPL. However, it is important to ensure PC3 does not conflict with the NPS-HPL. This submission and others, and discussions at the pre-hearing suggest that the use of the term versatile soils does conflict.</p> <p>In response to this and other submissions, changes are recommended to UFD-P3 <b>to remove reference to versatile soils and replace with the NPS-HPL expression of 'highly productive land'</b>.</p>

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	<b>National Public Health: MidCentral, Te Whatu Ora, Health New Zealand</b>							These changes largely addresses the relief sought by this submitter in that the provisions do not conflict with the NPS-HPL (which has effect already) and reflect the agreements reached through pre-hearing.
			UFD-P4	Amend	We wish to minimise potential risks to health from intensification.	Under subclause (1) add a new subclause (1)(f) consideration is given to the risk to public health from intensification	19.5	<b>Reject</b>  I consider this goes beyond the requirements of the NPS-UD and in any case elements of public health are already addressed by the One Plan provisions and elements of PC3. For example, supporting reductions in greenhouse gas emissions, provision of various transport modes and provision of development infrastructure are all addressed through various provisions in PC3. For effects associated with construction, the One Plan includes provisions in chapters 4 and 5 of the RPS and Chapters 13 and 14 of the Regional Plan which regulate effects from these activities.
			UFD-P4	Amend	We would suggest a minor wording change to sub clause (4) by way of enabling and encouraging active transport.	Under sub clause (4) include the words 'and encouraging'.	19.6	<b>Reject</b>  I consider the notified wording is sufficient, noting that Method 2 provides more detail on how active transport should be enabled.
			UFD-P4	Amend	We would encourage Horizons Regional Council and Palmerston North City Council to support other Territorial	Horizons Regional Council and Palmerston North City Council to support other Territorial Authorities in the region to	19.7	<b>Reject</b>  While I appreciate the intent of this submission point, I do not consider it

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	<b>National Public Health: MidCentral, Te Whatu Ora, Health New Zealand</b>				Authorities in the region to undertake Housing and Business Development Capacity Assessments* and Future Development Strategies*.	undertake Housing and Business Development Capacity Assessments* and Future Development Strategies*		appropriate for a Policy to place an onus on the regional council or PNCC to support other councils to develop HBAs and FDSs. This goes beyond the scope of the NPS-UD and is something I believe would be best dealt with separately to this plan change.  Further, Method 2 provides guidance on strategic planning for non-tier 1 and 2 authorities. I believe this would be a better place for a suggestion of this nature.
			UFD-P4	Amend	We suggest that equity is considered in the way that urban intensification is done.	Add a fifth subclause to UFD-4 as follow: (5) The intensification and expansion of urban environments is done in a just and equitable manner	19.8	<b>Reject</b>  In my opinion, the provisions of PC3, including UFD-P4 sufficiently provide for development to occur in an equitable way. I believe this is addressed through the NPS-UD definition of a well-functioning urban environment which strives to enable a variety of homes that meet the needs of the community in terms of house type, price and location.
			UFD-P8	Amend	The Public Health Service considers that in times of drought, earthquake or climate change emergencies, consideration is given to emergency water supplies.	That this policy UFD-P8: Urban development and climate change^ be re-worded to include a statement regarding emergency water supplies.	19.9	<b>Reject</b>  Provision for emergency water supplies is generally a function of territorial authorities. It may also be addressed in emergency management plans. In my opinion, it would be out of step with the remainder of this policy to place a prescription on providing for emergency water supplies.

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	<b>National Public Health: MidCentral, Te Whatu Ora, Health New Zealand</b>		Definitions	Amend	We consider that the 'development infrastructure' definition should be future proofed to take into account developments in the Three Waters space involving control of water infrastructure, which may no longer sit with Councils.	The proposed plan change is future proofed for any developments occurring through Three Waters.	19.10	<b>Reject</b> There is still a high level of uncertainty associated with Three Waters and how this will be implemented under current or new legislation. I therefore consider it unnecessary and inappropriate to provide for this in the development infrastructure definition.