

24 March 2025

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2025
AW:LMS

The Governance Team
Palmerston North City Council
Private Bag 11034
PALMERSTON NORTH

submission@pncc.govt.nz

Dear Madam/Sir,

FURTHER SUBMISSION: PROPOSED PLAN CHANGE I – INCREASING HOUSING SUPPLY AND CHOICE.

Thank you for the opportunity to provide further submission on the Proposed Plan Change I: Increasing housing supply and choice.

Horizons Regional Council (Horizons) is responsible for managing natural resources across our region, which includes flood control, air and water quality monitoring, pest control, facilitating economic growth, leading regional land transport planning and coordinating the region's response to natural disasters.

Environmental planning is a key function. Horizons' integrated planning document, the One Plan, sets out four keystone environmental issues for the region – surface water quality degradation, increasing water demand, unsustainable hill country land use, and threatened indigenous biodiversity.

Horizons has no trade competition advantage in this submission. Our interest in the proposed plan change is primarily from our role as the regional authority for the area that is subject to the plan change. The submission reviews the proposed district plan change in light of its alignment with the Regional Policy Statement component of the One Plan and ensures that the proposed changes are consistent with our Regional Plan provisions.

Horizons submits in **opposition** to parts of the submission made by SO199 Kāinga Ora. Specifically, Horizons opposes the following submission points:

1. **SO199.5:** Horizons opposes the request to delete the following parts of SUB-MRZ-P1:

- *"renewable energy and other"*
- *"1.Optimise solar gain;"*
- *"2.Incorporate water sensitive design*;"*

The above provisions are required to give effect to Horizons' One Plan [RPS-UFD-P8](#)

(1) Urban environments are developed in ways that support reductions in 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 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,*

...

(2) Territorial authority decisions and controls:

...

*(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.***

Relief sought: Retain the above provisions in SUB-MRZ-P1 or include alternative provisions that give effect to RPS-UFD-P8 (2)(b).

2. **SO199.8:** Horizons opposes:

- the request to delete Stormwater Overlay
- the amendments requested for SUB-MRZ-P4

Horizons recognizes that PC 1 is a significant step towards enabling housing intensification in Palmerston North. However, limited capacity of stormwater related infrastructure constrains the city's infill capacity. To address this, a consenting assessment should be required for areas with insufficient infrastructure capacity to manage stormwater concerns effectively.

The stormwater overlay has been identified as a strategic provision to manage intensification in areas prone to stormwater issues. While there could be data gaps in fully justifying stormwater overlay, Horizons considers it a precautionary approach to mitigate potential issues arising from infill development in this area. Horizons submits that the stormwater overlay is a key provision in giving effect to Horizons' One Plan:

- RPS-HAZ-NH-P12 *The Regional Council and Territorial Authorities **must manage future development** and activities in areas susceptible to natural hazard events (excluding flooding) in a manner which:*

...

3. is unlikely to cause a significant increase in the scale or intensity of natural hazard events.

- RPS-HAZ-NH-P13 *The Regional Council and Territorial Authorities must take a precautionary approach when assessing the effects of climate change and sea level rise on the scale and frequency of natural hazards with regard to decisions on:*
1. *stormwater discharges and effluent disposal,*
...

Relief sought: Retain stormwater overlay related provisions subject to Horizons' original submission points.

3. SO199.22: Horizons opposes the request to delete MRZ-P7 for the same reasons outlined in the submission point 2 above.

Relief sought: Retain MRZ-P7.

4. SO199.23: Horizons opposes the request to delete MRZ-P10.

MRZ-P10 gives effect to Horizons' One Plan provision RPS-UFD-P8 (2)(b).

Horizons' original submission requested revisions to MRZ-R7 to MRZ-R15 to ensure they give effect to MRZ-P10.

Relief sought: Retain MRZ-P10 and revise MRZ-R7 to MRZ-R15 to ensure they give effect to MRZ-P10.

Horizons submits in **support** of a part of the submission made by SO210 Natural Hazards Commission Toka Tū Ake.

1. SO210.14: Horizons supports the request to amend MRZ-S11:

Even though Horizons' OnePlan does not specify a required minimum floor level based on 1% AEP event for area subject to PC I, Horizons considers the requested amendment to be a precautionary approach, particularly in light of the impacts of climate change.

Horizons wishes to be heard in support of this submission. If others make similar submissions, Horizons would be open to presenting a joint submission to the hearing panel.

Yours sincerely,


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SENIOR POLICY PLANNER

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