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Kia ora,

SUBMISSION: PROPOSED PLAN CHANGE B - GENERAL RESIDENTIAL

Thank you for the opportunity to make a submission on Proposed Plan Change B - General Residential.

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 regard to its alignment with the Regional Policy Statement component of the One Plan and seeking to ensure that the proposed change is consistent with the One Plan provisions.

General Comment

Proposed Plan Change B (PC B) generally aligns with Horizons' One Plan, the Regional Land Transport Plan (RLTP), the Regional Public Transport Plan (RPTP) and National Policy Statement on Urban Development (NPS-UD). It enables housing intensification within the Feilding urban environment while taking identified constraints into account.

Horizons also acknowledges that Manawātū District Council (MDC) intends to review its approach to natural hazard management through a future plan change (Section 32 Report, page 24). Horizons expects this review will include provisions to address risks not covered in PC B, such as stormwater flooding, seismic activity and liquefaction.

In this context, Horizons generally supports PC B and makes the following submission points.

Submission Points

1. Horizons **partly opposes** GRZ-ST3 as it does not align with NPS-UD Policy 5 and One Plan RPS-UFD-P4 (3).

NPS-UD Policy 5 says:

"Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

- a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
- b) relative demand for housing and business use in that location."*

RPS-UFD-P4(3) says:

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

- a) relative demand for housing and/or business use in that location, or*
- b) the level of accessibility provided by existing or planned active transport or public transport to areas with community services and employment opportunities."*

The Section 32 Report of PC B (page 10) says:

"The Manawātū District is a tier 3 local authority area, and therefore Policy 5 does not directly apply. That said, NPS-UD Clause 1.5 strongly encourage tier 3 local authorities to implement these obligations.

PC-B provides for intensification and higher density (medium density housing) style living across the entire GRZ. A specific plan framework is proposed to manage this form of development without specific restrictions but rather places emphasis on good design principles at the forefront of the process, to ensure that the District Plan supports the creation of enduring, functional and quality places for people. "

Horizons does not agree with the Section 32 interpretation on the applicability of NPS-UD Policy 5 to tier 3 local authority areas. Since NPS-UD Policy 5 explicitly applies to both tier 2 and 3 urban environments, tier 3 councils, including Manawātū District Council, are obliged to give effect to Policy 5, not merely encouraged to. Clause 1.5 of NPS-UD applies only to provisions that are exclusive to tier 1 and 2 local authorities.

Furthermore, *Appendix 1: Regional Direction Assessment of Section 32 Report* (Pages 48-49) does not clearly demonstrate how the plan change gives effect to RPS-UFD-P4 (3).

Relief Sought:

Horizons requests that the MDC:

- 1) include an assessment demonstrating how PC B gives effect to NPS-UD Policy 5 and RPS-UFD-P4(3), and
 - 2) where that assessment identifies the need for increased building height, amend the GRZ-ST3 accordingly.
2. Horizons **partly opposes** GRZ-R6, GRZ-APP1, SUB-GRZ-ST9 as they do not give effect to One Plan RPS-HAZ-NH-P9(3) and RPS-HAZ-NH-P10(2). These policies requires councils to provide for the avoidance or mitigation of the effects of a 1 in 200 year flood event.

Relief Sought:

Horizons requests GRZ-R6, GRZ-APP1 and SUB-GRZ-ST9 be amended to give effect to RPS-HAZ-NH-P9(3) and RPS-HAZ-NH-P10(2).

3. Horizons **supports** GRZ-O1, GRZ-O2, GRZ-O3.2, GRZ-P2.1, GRZ-P2.2, GRZ-P2.3, GRZ-R7, and GRZ-ST14 as they align with the One Plan provisions; RPS-UFD-O3, RPS-UFD-P4 (1) (a)-(g), and RPS-UFD-P8(2)(a).

Relief Sought:

Horizons requests GRZ-O1, GRZ-O2, GRZ-O3.2, GRZ-P2.1, GRZ-P2.2, GRZ-P2.3, GRZ-R7, and GRZ-ST14 be retained as notified.

4. Horizons **supports** GRZ-P3, GRZ-ST10, and GRZ-ST11 as they align with the One Plan provisions; RPS-UFD-P8(1)(a), RPS-UFD-P4(1)(g), RPS-LF-FW-O4(1), and NPS-FM policy 3 and clause 3.5(4).

Relief Sought:

Horizons requests GRZ-P3, GRZ-ST10, and GRZ-ST11 be retained as notified.

5. Horizons **supports** GRZ-ST4.4 it aligns with the One Plan RPS-ETI-P2.

Relief Sought:

Horizons requests GRZ-ST4.4 be retained as notified.

6. Horizons **supports** SUB-GRZ-O2, SUB-GRZ-O3, SUB-GRZ-P1, SUB-GRZ-P3, and SUB-GRZ-ST8 as they align with the One Plan provisions; RPS-UFD-O1, RPS-UFD-O3, RPS-UFD-O5, RPS-UFD-P1, and RPS-UFD-P4(1), RPS-UFD-P5, and RPS-UFD-P8.

Relief Sought:

Horizons requests SUB-GRZ-O2, SUB-GRZ-O3, SUB-GRZ-P1, SUB-GRZ-P3, and SUB-GRZ-ST8 be retained as notified.

7. Horizons **supports** SUB-GRZ-O3 as it aligns with the One Plan provisions; RPS-UFD-O5, RPS-UFD-P8, and RPS-HAZ-P12.

Relief Sought:

Horizons requests SUB-GRZ-O3 be retained as notified.

8. Horizons **supports** SUB- GRZ-P6 as it aligns with the One Plan provisions RPS-HAZ-P12.

Relief Sought:

Horizons requests SUB- GRZ-P6 be retained as notified.

9. Horizons **supports** SUB-GRZ-ST6 as it aligns with the One Plan provisions; RPS-UFD-P8(1)(a), RPS-UFD-P4(1)(g), RPS-LF-FW-O4(1), and NPS-FM policy 3 and clause 3.5(4).

Relief Sought:

Horizons requests SUB- GRZ-ST6 be retained as notified.

10. Horizons **partly supports** SUB-GRZ-ST7.

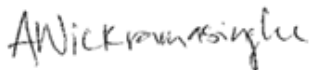
Horizons supports the overarching intent to require an integrated stormwater management plan prepared by a suitably qualified person. However, unlike the *General Residential Zone (GRZ)* chapter, the *Subdivision – General Residential Zone (SUB-GRZ)* chapter does not include guidance on the expected content of such a plan. In contrast, *General Residential Zone (GRZ)* chapter provide greater clarity, with GRZ-P3 outlining of the requirements of an integrated stormwater management plan referenced in GRZ-ST11. In our view, this additional detail is required make sure the consent decisions give effect to RPS-UFD-P8(1)(a), RPS-UFD-P4(1)(g), RPS-LF-FW-O4(1), and NPS-FM policy 3 and clause 3.5(4).

Relief Sought:

Horizons requests that the Council include the outline of the required integrated stormwater management plan referenced in SUB-GRZ-ST7, consistent with the approach taken in the *General Residential Zone (GRZ)* chapter.

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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