

25 July 2025

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AW:LMS

District Plan Team,
Manawātū District Council,
135 Manchester Street,
Feilding 4702.

submissions@mdc.govt.nz

Dear Madam/Sir,

SUBMISSION: PROPOSED PLAN CHANGE E -TOWN CENTRE

Thank you for the opportunity to make a submission on Proposed Plan Change E: Town Centre.

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 regards 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 E (PC E) 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 22). Horizons expects this review will include provisions to address risks not covered in PC E, such as stormwater flooding, seismic activity and liquefaction.

Additionally, Section 32 Report (page 22) states, in relation to *stormwater and flooding hazards*:

"A rule requiring resource consent for building on [identified] land subject to inundation has been inserted. The associated policy states that building on such land should be avoided unless floor level can be built up."

However, these provisions, which Horizons considers necessary to give effect to One Plan's RPS-HAZ-NH-P9 and RPS-HAZ-NH-P10, do not appear to be included in PC E.

In this context, Horizons partly supports PC E and makes the following submission points.

Submission Points

1. Horizons **party opposes** MUZ-ST1.1 and TCZ-ST1.1 as they do 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 E (page 11) 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-E permits higher density apartment-style living within the Town Centre Zone and Mixed Use Zone and increases the maximum height for buildings to enable more residential and business opportunities within the Feilding Town Centre. The area covered by both zones already accommodates public and active transport options.

Height limits in the Town Centre Zone and Mixed Use Zone are proposed to be increased from 9m to 12m to provide more flexibility for businesses and to facilitate further apartments. This provides the opportunity for multi-storey apartments should demand for this development type exist in the future."

Horizons does not agree with the Section 32 interpretation on the applicability of NPS-UD Policy 5 on tier 3 local authority areas. Since NPS-UD Policy 5 explicitly applied 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 56-60) does not clearly demonstrate how the plan change gives effect to RPS-UFD-P4 (3).

Relief Sought:

Horizons requests that the Council:

- 1) Include an assessment demonstrating how PC E gives effect to NPS-UD Policy 5 and RPS-UFD-P4(3).
 - 2) Where that assessment identifies the need for increased building height, amend the MUZ-ST1.1 and TCZ-ST1.1 accordingly.
2. Makino Stream intersects the Town Centre Zone (TCZ) at Manchester Street. This area is identified as "Land Subject to Inundation" in GRZ-APP1 of PC B. PC B includes provisions under GRZ-R6 to manage flood risk on land subject to inundation along the Makino Stream. Horizons has requested to amend GRZ-R6 and GRZ-APP1.

Horizons recommends that the amended provisions in GRZ-R6 of PC B be applied to the part of the Town Centre Zone intersected by the Makino Stream.

Relief Sought:

Horizons requests PC E be amended to incorporate the amended provisions of GRZ-R6 proposed in PC B, to ensure consistency in the management of flood hazards across the District Plan.

3. Horizons **partly opposes** TCZ-ST2 as it does not align with the One Plan RPS-EIT-P2. The proposed Town Centre Zone (TCZ) intersects with the Makino Stream, and appropriate provisions are required to protect the bank of the stream from effects associated with urban development. Horizons recommends adopting a similar approach to that taken in *General Residential Zone (GRZ-ST4.4)* to address this matter.

Relief Sought:

Horizons requests TCZ-ST2 be amended to include provisions that protect the bank of Makino Stream, ideally reflecting the approach taken in GRZ-ST4.4 in PC B.

4. Horizons **supports** MUZ-P2 and TCZ-P2 as they align with the One Plan provisions; RPS-UFD-O3 and RPS-UFD-P4 (1) (a)-(g)

Relief Sought:

Horizons requests MUZ-P2 and TCZ-P2 be retained as notified.

5. Horizons **supports** MUZ-O5, MUZ-P10, MUZ-ST17, TCZ-O4, TCZ-P9, and TCZ-ST15 as they align with the One Plan provisions; RPS-UFD-P8(1)(a) RPS-LF-FW-O4(1), and NPS-FM policy 3 and clause 3.5(4). Additionally, it is noted that TCZ-ST15 is incorrectly referred to as TCZ-ST16 in TCZ-R3.1, which may require correction.

Relief Sought:

Horizons requests that the Council:

- i. retain MUZ-O5, MUZ-P10, MUZ-ST17, TCZ-O4, TCZ-P9, and TCZ-ST15 as notified.
- ii. correct the reference to TCZ-ST15 in TCZ-R3.1

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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