

19 December 2024

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2024
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 E – ROXBURGH CRESCENT RESIDENTIAL AREA.

Thank you for the opportunity to provide further submission on the Proposed Plan Change E: Roxburgh Crescent Residential Area.

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.

1. Horizons submits in **opposition** to parts of the submission made by S11 Frances Holdings Limited. Specifically, we oppose the following submission points:

- **S11.020**: Section 10, Rule 10.6.1.8(d)
- **S11.021**: Section 10, Rule 10.6.5.6
- **S11.001**: Section 32 Report – Appendix J: Stormwater Servicing Assessment

The submitter contends that these rules are redundant and unjustified. However, Horizons considers these provisions essential as they reinforce Objective 17, Policy 17.2, and Policy 17.3, which give effect to Horizons' One Plan Policy:

RPS-UFD-P8: Urban development and climate change

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,
- b. urban development being compact, well designed and sustainable, and
- c. requiring a risk based approach to their resilience to the impacts of climate change, including sea level rise and any increases in the scale and frequency of natural hazard events.

Furthermore, Objective 17, Policy 17.2, Policy 17.3, Rule 10.6.1.8(d), and Rule 10.6.5.6 align with the Palmerston North Future Development Strategy (FDS) which was developed jointly by Palmerston North City Council and Horizons Regional Council.

Horizons acknowledges the concerns raised by Frances Holdings Limited in submission point S11.001, particularly their request to delete Rule 10.6.1.8(d) and either delete or amend Policies 17.2 and 17.3. Their position is based on the claim that, as the Plan Change area is currently 100% impervious, redevelopment will not increase stormwater flows. However, given the existing stormwater challenges in Palmerston North, a precautionary approach remains essential. The National Policy Statement on Urban Development (NPS-UD), Horizons' One Plan (RPS-UFD chapter), and the FDS emphasize the need to ensure urban development does not exacerbate these issues. This is particularly important while the City-wide Stormwater Strategy is still being developed to better understand the scope of the problem.

Horizons seeks the retention of these provisions as they are consistent with the outcomes sought in both the One Plan and the FDS.

2. Horizons further submits on following submission points in relation to the submission made by S09 Palmerston North City Council:

- a. Horizons supports submission point **S09.001** which aligns with following One Plan policies:
 - RPS-LF-FW-O3: Water quality outcomes
 - RPS-LF-FW-O4: Protection of freshwater ecosystems
 - RPS-LF-FW-P4: Water quality management
 - RPS-LF-FW-P12: Stormwater quality improvement
- b. Horizons acknowledges the emphasis on addressing climate change aspects in the performance standards outlined in submission point **S09.004**, which gives effect to One Plan policy *RPS-HAZ-NH-P13 Climate change*. However, we highlight that stormwater inundation is identified in the One Plan not as flood hazard, but as an "other types of natural hazard". Accordingly, One Plan policy *RPS-HAZ-NH-P12: Other types of natural hazards* applies to the plan change provisions related to

stormwater management and relevant mitigation methods in areas prone to stormwater inundation.

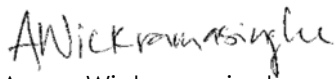
RELIEF SOUGHT

Horizons requests:

- Retention of Policy 17.3, Rule 10.6.1.8(d) and Rule 10.6.5.6 to ensure alignment with One Plan objectives and policies and the FDS.
- Support for PNCC's proposed changes to improve stormwater quality and treatment, in line with One Plan policies.
- Any further, alternative, or consequential relief necessary to address the matters raised and achieve the intended outcomes.

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,



Aruna Wickramasinghe
SENIOR POLICY PLANNER

Address for service:
Aruna Wickramasinghe
Policy and Strategy Team
Horizons Regional Council
Private Bag 11025
Manawatu Mail Centre
PALMERSTON NORTH 4412
Email: Aruna.Wickramasinghe@horizons.govt.nz