

## Appendix C - Plan Change 3 Objectives and Policies Assessment Table

Proposed Objective	Comment
<p><b>UFD-01: Strategic Planning and Urban Development</b></p> <p>Strategic planning for urban development ensures that:</p> <ul style="list-style-type: none"> <li>(a) sufficient development capacity and land supply for housing and business uses is provided to support growth,</li> <li>(b) new development, development infrastructure and additional infrastructure are provided in a coordinated, integrated and efficient manner,</li> <li>(c) the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and</li> <li>(d) competitive land and development markets are supported in ways which improve housing affordability.</li> </ul>	<p>This objective directs Councils strategic planning activities. While Council don't have a district wide -urban growth plan, PC1 assist Council with providing sufficient development capacity that is not out of sequence with planned infrastructure upgrades at Rongotea. With regard to (c) in providing for the diverse needs of the community, I consider providing housing options in a village setting, rather than an urban one such as in Feilding, is consistent with this objective.</p> <p>With regard to (d) that requires urban development supports competitive land development markets to improve housing affordability, I note that PC1 introduces land supply in a single landholding. This lends itself to housing providers who are better positioned to deliver cost effective housing at scale.</p>
<p><b>UFD-02: Urban growth and rural residential subdivision on versatile soils</b></p> <p>To ensure that territorial authorities consider the benefits of retaining Class I and II versatile soils for use as production land when providing for urban growth and rural residential subdivision</p>	<p>This objective and Policy UFD-P3 below have been carried over without change from the Horizon's Policy Statement. I note that Class I and II soils are not defined in the Horizon's One Plan to preclude more detailed mapping. The assessment by Sharn Hainsworth from LUC Assessments Ltd provided a 1:15,000 scale assessment of the soils present within the plan change area. The regional scale assessment by comparison is done at a scale of 1:50,000. The results conclude that the site does not contain any Class I or Class II versatile soils, mostly due to poor drainage and a rising water table. Plan change decision makers can be comfortable that the plan change gives effect to this objective.</p>

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**UFD-03: 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 housing capacity and housing choice,
  - (c) achieve a quality, sustainable and compact urban form that relates well to its surrounding environment,
  - (d) are well connected by a choice of transport modes including public transport, and
  - (e) manage adverse environmental effects.
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-serviced 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.

This objective relates to the intensification and expansion of 'urban environments' defined in the NPS-UD as urban areas of more than 10,000 people. For the Manawātū Whanganui District this is Feilding, Levin, Whanganui and Palmerston North.

Nevertheless, the plan change provides for a well-functioning urban environment, in that it:

- (a) enables homes that meet the needs of different households, particularly in contrast to what might otherwise be available in Feilding;
- (b) To the extent possible, it enables Māori to express their cultural traditions and norms through influence on the development design where appropriate;
- (c) Has good accessibility, particularly to community services such as schools, natural and open spaces, and is potentially able to be serviced by public transport;
- (d) It will be well serviced by existing and planned infrastructure;

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**UFD-04: Urban development and the Treaty of Waitangi (Te Tiriti o Waitangi)**

Planning decisions regarding urban environments take into account the Treaty of Waitangi (Te Tiriti o Waitangi) principles.

The s32 report provides an assessment to demonstrate that the proposed PC objectives are the most appropriate way to meet the purpose and principles of the Act. Section 8 of the RMA, in turn, requires that that all persons, in achieving the purposes of the act in relation to managing the use, development, and protection of natural and physical

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resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Treaty principles are included in Section 6 as the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga. As described in the s32, the provisions of the development area provide the opportunity for Māori to express their relationship with the land and water. While no specific waahi tapu sites exist within the area, the development provides the opportunity for further engagement to occur at the detailed design stage to enable cultural expression in public areas, where appropriate. This is delivered via Objective DEV-02, point d.

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**UFD-O5: Urban development and climate change**

Urban environments are resilient to the effects of climate change and support reductions in greenhouse gas emissions.

While this objective relates to ‘urban environments’, it is also obviously important to consider with any new urban areas. The inland location of Rongotea means the site is not subject to coastal hazards. Being of flat topography, the site is not subject to any land instability issues that are potentially exasperated by increased rainfall with climate change. I consider therefore that the development area will be resilient to the effects of climate change. With regard to greenhouse gas emissions, the local day to day needs of residents could be met within walking distance by the local shops at Rongotea. Larger commercial and community facilities and employment hubs are available in Awapuni and Palmerston North, which is a distance of 17.7km away. While this route is not currently serviced by public transport, Horizon’s Regional Council have signalled in their Regional Land Transport Plan that investigation of a bus route between Palmerston North and Rongotea will begin in 2023. If not already delivered by the time development was to occur, a growth in population at Rongotea would likely be the impetus a bus service to be provided.

Proposed Policies	Comment
<p><b>UFD-P1: Integration of infrastructure with land use</b></p> <p>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:</p> <ol style="list-style-type: none"> <li>1. 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</li> <li>2. ensure there is co-ordination between the location, form and timing of urban growth and the funding, delivery and implementation of development infrastructure.</li> </ol>	<p>Manawatū District Council has indicated that an urban growth strategy is underway. Despite not having a specific strategy at the time this plan change was submitted, infrastructure planning within their LTP, including their 30 Year Infrastructure strategy, includes planning for infrastructure upgrades to accommodate urban growth. The wastewater and stormwater servicing upgrades currently underway at Rongotea have incorporated the potential for urban growth at Rongotea.</p>
<p><b>UFD-P2: Providing sufficient development capacity</b></p> <p>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:</p> <ol style="list-style-type: none"> <li>1. providing for urban intensification and urban expansion within district plans in accordance with UFD-P1, UFD-P4, and UFD-P5,</li> <li>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</li> <li>3. ensuring the urban intensification and expansion necessary to meet the housing bottom lines specified in Table X<sup>3</sup> is provided for in the Palmerston North District Plan.</li> </ol>	<p>This policy directs Councils to provide sufficient development capacity and land supply to accommodate demand. It considers that this can be provided by both urban intensification as well as urban expansion and that Councils needs to be responsive to unanticipated or out of sequence plan changes. See the required assessment under UFD-P6 below. Approving the plan change will give effect to this policy.</p>

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

Housing bottom lines* (number of dwellings)	
Short-to medium-term July 2021 - June 2031 Includes an additional margin of 20%	Long-term July 2031 – June 2051 Includes an additional margin of 15%
5,045	7,925

**UFD-P3: Urban growth and rural residential subdivision on versatile soils**

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 Class I and II versatile soils for use as production land in their assessment of how best to achieve sustainable management.

This policy and objective UFD-O2 above have been carried over without change from the Horizon’s Policy Statement. I note that Class I and II soils are not defined in the Horizon’s One Plan to preclude more detailed mapping. The assessment by Sharn Hainsworth from LUC Assessments Ltd provided a 1:15,000 scale assessment of the soils present within the plan change area. The regional scale assessment by comparison is done at a scale of 1:50,000. The results conclude that the site does not contain any Class I or Class II versatile soils, mostly due to poor drainage and a rising water table. Plan change decision makers can be comfortable that the plan change gives effect to this policy.

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

1. Intensification and expansion of urban environments is provided for and enabled in district plans where:
  - (a) it contributes to a well-functioning urban environment,
  - (b) it provides for a range of residential areas that enable different housing types, site size and densities that relate well to the surrounding environment,

While this policy relates to ‘urban environments’, the following provides for an assessment against aspects of this policy that could apply to all new urban areas. The plan change provides for a well-functioning urban environment, in that it:

- (a) enables homes that meet the needs of different households, particularly in contrast to what might otherwise be available in Feilding;

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- (c) higher density development is in close proximity to centre zones, public transport, community services, employment opportunities, and open space,
  - (d) development is well serviced by existing or planned development infrastructure and public transport, and additional infrastructure required to service the development capacity 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.
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,
  - (c) is well-connected along transport corridors,
  - (d) manages adverse reverse sensitivity effects on land with existing incompatible activities adjacent to the urban environment boundary.
3. District plans applying to urban environments must enable heights and density of urban form which are equal to the greater of:
- (a) demonstrated demand for housing and/or business use, or
  - (b) the level of accessibility provided by existing or planned active transport or public transport to areas with community services and employment opportunities.
- (b) To the extent possible, it enables Māori to express their cultural traditions and norms through influence on the development design where appropriate;
  - (c) Has good accessibility, particularly to community services such as schools, natural and open spaces, and is potentially able to be serviced by public transport;
  - (d) It will be well serviced by existing and planned infrastructure;
  - (e) The provisions will ensure the protection of the waterways within the site, including a natural inland wetland;
  - (f) The PC area is adjacent to existing urban areas, will not result in sporadic patterns of residential growth and is well connected along transport corridors;
  - (g) The development will reduce potential reverse sensitivity issues that could arise if the land was to remain as farm land.
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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.
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**UFD-P5: Built forms**

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
4. enables development across multiple or amalgamated properties to achieve all of the above.

This policy largely repeats the policy above, with the inclusion of a requirement to recognise and enable marae and papakāinga development. We consider this would be best addressed on a District wide scale as part of the upcoming District Plan review. With regard to 4. The plan change area enables development across two properties which provides a suitable land area to support development that contributes to a well-functioning urban environment.

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**UFD-P6: Significant development capacity criteria**

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 transport corridors, and to community services, and open space,

This policy is directed by Clause 3.8 of the NPS-UD which requires Regional Councils to include criteria within a RPS for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity. This is to assist in determining private plan changes that are unanticipated or out of sequence with Council's planned land release.

This private plan change meets the criteria for consideration for the following reasons:

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- (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 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 and other physical resources of regional or national importance as far as reasonably practicable.
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.
- (a) The housing demand assessment undertaken by the applicant, with data provided for by Council, demonstrates a shortfall of specific housing needs in the market.
- (b) Once rezoned, the development will be realised in the short term before Council undertakes planning of its own to provide for this shortfall.
- (c) The infrastructure upgrades at Rongotea to support this development are planned, and well underway. It is not considered that providing this infrastructure will impact on the ability of the provision of other planned development infrastructure and expenditure
- (d) The development will not overload existing infrastructure as the required upgrades have been assessed, and the provisions ensure that infrastructure needs to be available before development can occur. In terms of physical resources of regional or national importance, the area is well set back from state highways and the Ohakea Air base. There is not considered to be any other physical resources in the vicinity.
- (e) As demonstrated under UFD-P4 above, the location, design and layout of the development will contribute to a well-functioning urban environment
- (f) the development is well-connected along transport corridors, and to local community services. Open space is to be provided through the development which will also service the existing village of Rongotea.
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**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) 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 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, 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.

Hapū and iwi were invited to be involved in the early planning stages of the plan change, and some hapū and iwi took up the opportunity. To ensure opportunities for involvement were continuous for all relevant iwi and hapū, the provisions require further engagement at the detailed design stage on matters of cultural importance. This will enable the urban environment to potentially be a space where Māori are able to express their cultural traditions and norms.

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**UFD-P8: Urban development and climate change**

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 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

The stormwater design, including the use of swales and wetlands, demonstrates best practice water sensitive design methods. The development seeks to incorporate nature features as much as possible, this being a key objective of the development area.

The existing land use provisions for the Village Zone include a rule that requires the main living space and outdoor area to be north facing, to encourage energy efficient house design and access to solar energy.

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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.

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 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

With regard to climate change, the inland location of Rongotea means the site is not subject to coastal hazards. Being of flat topography, the site is not subject to any land instability issues that are potentially exasperated by increased rainfall with climate change. I consider therefore that the development area will be resilient to the effects of climate change.

With regard to greenhouse gas emissions, the local day to day needs of residents could be met within walking distance by the local shops at Rongotea and walking and cycling are well provided for within the required roading cross sections. Larger commercial and community facilities and employment hubs are available in Awapuni and Palmerston North, which is a distance of 17.7km away. While this route is not currently serviced by public transport, Horizon's Regional Council have signalled in their Regional Land Transport Plan that investigation of a bus route between Palmerston North and Rongotea will begin in 2023. If not already delivered by the time development was to occur, a growth in population at Rongotea would likely be the impetus a bus service to be provided.