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Brent Limmer
General Manager – Community and Strategy
Manawatu District Council
60 Stafford Street
FEILDING

Dear Brent

HORIZONS REGIONAL COUNCIL SUBMISSION: MDC PROPOSED PLAN CHANGE 51 & 64

Thank you for the opportunity to respond to the proposed plan changes for Manawatu District Council's Proposed Plan Changes 51 & 64.

At Horizons Regional Council (Horizons) we believe our region is a great place to live, work and play. As a regional council, our responsibilities include managing the region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

In terms of environmental planning, our integrated planning document the One Plan sets out four keystone environmental issues for our region – surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened indigenous biodiversity.

Regionally, the Accelerate25 programme identifies a number of opportunities and key enablers to help realise our Region's economic potential. The action plan sets out a path to grow our regional prosperity between now and 2025. An expected outcome of the Accelerate25 programme is to see managed urban growth and increased economic activity on our region.

In relation to the proposed plan change proposals 51 & 64, our key areas of focus are land use change, improving water quality, stormwater management, natural hazard planning, biodiversity, integrated transport and responding to cultural needs within our region. These areas are addressed in brief on the following pages.

Yours sincerely

A handwritten signature in blue ink that reads "Sarah Carswell".

Sarah Carswell
COORDINATOR DISTRICT ADVICE

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

SUBMISSION OF HORIZONS REGIONAL COUNCIL

MANAWATU PROPOSED DISTRICT PLAN CHANGE 51

This submission considers the relationship between Horizons' One Plan¹ and the need for the District Plan to give effect to the regional policy statement components and not be inconsistent with regional plan provisions, as set out in section 75 of the Resource Management Act 1991 (RMA).

This submission also considers the contributions the proposed district plan changes will make to the Regional Land Transport Plan's strategic priorities.

Horizons does not consider it would gain an advantage in trade competition through this submission.

Where not otherwise specified, Horizons generally supports the Proposed Plan Change or any further, alternative or consequential relief; as these proposals are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

CHAPTER 8: SUBDIVISION

Support Objectives 1(a), 1(d), 1(f) or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

Support Policies 1.2-1.5 or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

Support in part Objectives 1(b), 1(c), 1(e), 1(g) and 1(h)
Policies 1.1, 3.3, 3.4, 3.5, 3.7, 3.8
Rules g(viii)(ix)(xi)(xiv)(xv)

Taken together, these objectives do not adequately address the provisions in the One Plan that relate to infrastructure, particularly stormwater management. Issue 3-3 identifies strategic integration of infrastructure with land use, and links with water quality (Issue 5.1) and natural hazards (Issue 9.1).

Effective stormwater management, delivered through a combination of robust regulation and guidance in the District Plan provisions and careful operational planning during subdivision activities, development and construction is necessary for any future urban growth within the identified precinct area.

The stormwater quantity and quality objectives of the One Plan are not met when considering the sensitivity and high in-stream values of the receiving environment. The proposal to incorporate a single large pond and its location do not appear to adequately address the stormwater discharge from Growth Precinct 4. There is

¹ Manawatū-Whanganui combined regional policy statement (RPS) and regional plan

also potential to exacerbate stormwater-related flood hazards for the Feilding township.

Horizons has undertaken significant investment in works to support effective management and protect Feilding CBD from inundation. This work is planned to continue as part of our ongoing programme of work. However it should not be relied upon as an effective mitigation to the stormwater risks faced by increased urban development in Growth Precinct 4.

It should be noted that the modifications to the Reid Line Floodway north of Feilding address both limitations with the current configuration and ensuring that the flood protection standard is commensurate with the level of operating risk.

Horizons support the inclusion of rule performance standards identifying the location of natural watercourses and overland flow path and how these will be managed or enhanced from the perspective of effective natural hazard management.

Horizons notes that the overland flow path information you propose to include in the district plan as an appendix risks becoming out-dated given the potential for changes to ground levels. We understand that the intent of the provisions is primarily to ensure thorough consideration of this matter early in a consenting process and in the creation of Comprehensive Development Plans.

Relief sought

In previous discussions with MDC staff, Horizons highlighted the requirements that would need to be met to account for future urban growth, particularly where there would be further pressure on the Makino/Mangakino Stream, taking into account the existing stormwater discharges from Feilding.

This included incorporation of contemporary stormwater management principles and adoption of best practise (based on examples from across New Zealand). Horizons refer you to Rule 14-18 in the One Plan for the stormwater conditions that must be met for permitted activities.

Relief sought includes:

- a. changes to the objectives, policies and rules to give effect to effective stormwater management arising from Growth Precinct 4.
- b. retention of the wording relating to objective 1(h) in relation to natural hazards, except where changes are needed to address the stormwater issues as outlined (any such wording of a similar effect).

Support in part Objective 2
Policies 2.1-2.7

Horizons is generally comfortable with the wording proposed, or any such wording of a similar effect, however there are additions that could be considered for this objective and policy suite where they are not otherwise addressed in the plan.

Indigenous biodiversity is not considered specifically within this Proposed Plan Change, and the further loss of indigenous biodiversity, or lack of enhancement through urban development is an issue that would need to be addressed to be consistent with the provisions of the One Plan (Issue 6.1, Policy 6-3 and 6-4).

The One Plan also has a Chapter on Te Ao Maori. While not strictly within our remit, it is noted that the proposed subdivision makes no mention of Papakainga Housing. It should however be noted that the One Plan also acknowledges Hapu and Iwi interest in indigenous biodiversity, and resource management issues generally.

Relief sought:

- a. changes to the objective and policies to include integration of indigenous biodiversity, particularly preventing further loss, and enhancement of indigenous biodiversity within Growth Precinct 4.
- b. Consider the incorporation of policies that address the aspirations of Iwi and Hapu within the Rohe.

Support Objective 3
Rule f

Horizons support the inclusion of performance standards requiring minimum floor levels to mitigate the effects of a 0.5% annual exceedance probability (AEP) flood event within Chapter 8, and therefore support the proposed wording or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan.

Support in part Objective 4
Policies 4.1-4.5

Horizons support the objectives and policies in so far as they provide for effective infrastructure and growth planning, provided that they account for the stormwater management issues as addressed above.

Support in part Rules (chapter 8)

Horizons generally support the rules in Chapter 8, and the activity cascade, except where changes are needed to give effect to the issues raised in this submission.

CHAPTER 15: RESIDENTIAL ZONE

Support Objectives 1, 3 and 4 or any such wording of a similar effect; as these are considered consistent with the issues, objectives and policies of the One Plan, and/or matters for the territorial authority.

Support in part Objective 2

Horizons generally supports the proposed changes to strengthen the District Plan's provisions relating to natural hazards. New policies and amendments to rules, to enable more comprehensive consideration and control of subdivision and residential development where there are risks of flood hazards, give effect to One Plan Policy 9-4(a) and (c) in particular.

Ensuring buildings and structures are located and designed to manage the risk of natural hazards, rules about providing appropriate permeable surfaces and providing information about flooding, overland flows and liquefaction within the Growth Precinct gives effect to One Plan Policy 9-1(a)(i), with regard to our councils' joint responsibility for raising public awareness of the risk of natural hazards.

Horizons acknowledges that MDC commissioned liquefaction studies and that the proposed growth area generally has low vulnerability to liquefaction and liquefaction-induced ground damage.

Horizons supports the inclusion of the rule performance standards on subdivisions and residential development providing a building platform and land free from hazard risks while also achieving a permeable surface for all lots.

Horizons seeks the same relief as set out above in relation to stormwater management, natural hazards, indigenous biodiversity and Te Ao Maori in relation to these issues being effectively managed in residential development.

Appendix 8.1 Precinct 4 Structure Plan

Support in part

While the rezoning of this rural area for residential activities to plan for urban growth is well understood, this does result in the loss of versatile soils for rural production. It should be noted that there is a limited amount of class II soils available in the region, and their loss is an issue identified in the One Plan (Issue 3-4).

TRANSPORT

Horizons Transport Team generally supports the Proposed Plan changes, particularly:

- That the changes provide for development of multi-modal transport via shared pathways, walkways and cycleways which is consistent with the requirements of the Regional Land Transport Plan.
- That there is a strong theme in the consultation to date requesting adequate public transport services be provided in Growth Precinct 4. With that in mind we wish to advise that Horizons, in collaboration with MDC are undertaking a mid-term review of the Feilding Around Town / Feilding to Palmerston North bus service as the contract is in the middle of its nine year term. The review will consider urban growth in Feilding, specifically Growth Precinct 4, and assess any future public transport demand and requirements in these areas.

Given the possibility of future public transport services in this area, we request that MDC ensure that road and footpath design / layout is adequate to enable public transport infrastructure to be developed so as not to stifle growth of the network. We refer to Policy 5.1.7 of the Regional Land Transport Plan which states “Promote the increased use of public transport by planning and providing for public transport routes and facilities in residential subdivisions and major new facilities (territorial authorities, NZ Transport Agency)” The brackets indicate who is responsible for this. It is important that the changes to the District Plan provide for the development of such infrastructure as part of the subdivision chapter. We therefore request that MDC consider adding specific reference to possible future public transport networks and infrastructure under the Objectives and Policies of the subdivision chapter.

Horizons Transport Team look forward to continuing to work with MDC as the mid-term review progresses to ensure development of this area is well understood and considered as part of the review.

MANAWATU PROPOSED DISTRICT PLAN CHANGE 64

Horizons have reviewed the proposals and generally support the proposed changes. We consider that the proposals are not inconsistent with the One Plan.

Hearings

Horizons reserves the right to be heard in support of the submission on proposed plan change 51, but at this stage does not request to be heard. Horizons does not wish to be heard in support of proposed plan change 64.

Contact for submission queries

Please do not hesitate to contact the Coordinator District Advice, Sarah Carswell if you would like to discuss or clarify any aspect of this submission.

Email: sarah.carswell@horizons.govt.nz