



15 November 2022

Horizons Regional Council
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By email: submissions@horizons.govt.nz

Submission on Proposed Change 3 (Urban Development)

To: Horizons Regional Council

Name of Submitter: Rangitikei District Council

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Attention: Katrina Gray
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Trade competition: Rangitikei District Council cannot gain an advantage in trade competition through this submission.

Hearing: Rangitikei District Council wishes to be heard in support of our submission.

If others make a similar submission, Rangitikei District Council will consider presenting a joint case with them at a hearing.

Rangitikei District Council welcomes any opportunity to attend informal or formal pre-hearing meetings with Horizons and other parties to discuss matters raised.

Introductory comments

Thank you for the opportunity to submit on Proposed Change 3 (Urban Development). Rangitikei District Council (Council) generally supports the intent of Proposed Change 3, and recognise the requirement for Horizons Regional Council (Horizons) to align the Regional Policy Statement (RPS) with the National Policy Statement on Urban Development (NPS-UD). Council offers a number of suggested amendments that are aimed at reducing duplication and increasing efficiency of implementation.

The Rangitikei District is not a tier 1 - 3 local authority as identified by the NPS-UD as we do not have a tier 1 – 3 urban environment within our District. However, the Rangitikei, particularly the southern Rangitikei, is growing, having experienced a district-wide growth rate of 1.3% per annum since 2014.

Making this place home.

Council is in the process of planning for future growth through the development of Pae Tawhiti Rangitīkei Beyond, the Rangitīkei Spatial Plan. Council supports the intent and importance of providing sufficient land for development and creating well-functioning communities.

Submission on the proposed provisions

Scope and Background

This section sets out background information which covers urban development and versatile soils. Reference to the NPS-UD has been incorporated. However, reference to the National Policy Statement for Highly Productive Land (NPS-HPL) is not included. Council recommends that this section is updated to reflect the NPS-HPL.

Urban environments are specifically identified as being Feilding, Palmerston North, Levin and Whanganui. However, there is no recognition of the large number of other towns and settlements throughout the region that are growing and form an important part of providing for overall regional growth. It is also important that these towns and settlements grow in a manner that creates well-functioning communities.

Decisions sought

- That the section “Urban growth and rural residential subdivision on versatile soils” be updated in its entirety to reflect and align with the NPS-HPL.
- That additional commentary is included that recognises the importance of the contribution to regional growth for towns and settlements that are growing, but are not defined as *urban environments*.

Issues

Three issues are set out which cover strategic planning, versatile soils and demand for housing, business land, infrastructure and community services. Council suggests further consideration is given to the drafting of the issues to:

- Reframe the drafting to ensure the issues identify the problem that is sought to be addressed.
- Look for opportunities to incorporate regional context into the explanatory part of the identified issues.
- Update UFD-I2 to reflect the NPS-HPL, and regional council responsibilities under this national direction.

Decisions sought

- Incorporate additional regional context and redrafting to focus on issue identification in UFD-I1 and UFD-I3.
- Remove or update UFD-I2 to reflect the NPS- HPL.

Objectives and Policies

Of the objectives and policies proposed, some apply to *urban environments* only, while others do not differentiate. Of the five proposed objectives, three apply only to *urban environments*, one applies generally, and one is related to versatile soils. Of the eight proposed policies, four apply only to *urban environments*, one applies generally, two in part to urban environments and generally and one is related to versatile soils.

As there are no current *urban environments* in the Rangitīkei, those proposed objectives and policies that relate to these environments will not directly apply. Regardless, when undertaking growth planning and plan changes the objectives and policies would act as a guide of 'best practice' for consideration, therefore, we provide comment on the whole section.

Council acknowledges that the proposed objectives and policies have been designed to align with the NPS-UD. Council particularly supports the acknowledgement that both expansion and intensification are anticipated. In regional communities, providing for the widest range of housing options is important for their growth and sustainability. Council also supports iwi and hapū involvement in planning for urban development. Council particularly supports the enabling of papakāinga developments. However, Council questions the ability of Councils to give effect to hapū and iwi involvement 'decision making' under the current local government system.

Council suggests a number of amendments below we consider would improve implementation of the RPS.

Decisions sought

- Remove all objectives and policies related to versatile land, or make amendments to ensure alignment with the NPS-HPL. The NPS-HPL now supersedes the provisions included in Proposed Change 3.
- Where a provision is duplicating, or slightly amending provisions from the NPS-UD, without a specific regional outcome in mind, that the provision is amended to cross reference the NPS-UD. Or alternatively the provision is amended to reflect/incorporate a specific regional outcome.
- Amend the wording of UFD-P1 to replace the word must, with a less stringent alternative (e.g. should consider the value in).
- Reconsider the drafting of all objectives and policies to remove references to matters that are largely the function of territorial authorities (e.g. UFD-P4(1)(d) and UFD-P4(1)(b)), and recognise that rural towns and settlements do not have access to reliable public transport.
- Split UFD-P4 into two policies, one focused on expansion and the other on intensification. This will support each policy being tailored to consider the appropriate matters for each approach, as these are quite different. Recognise that both expansion and intensification will be necessary in the Horizons context to meet regional growth aspirations.
- Reconsider the drafting of UFD-P7 to not restrict application to urban environments, recognise that papakāinga may not always be on Māori owned land and recognises wider economic development needs for business environments.

Methods

Council notes four methods have been proposed:

- Method 1 -Monitoring and Reporting
- Method 2 – Strategic Planning
- Method 3 – District Plans
- Method 4 – Advocacy

Council welcomes the opportunity to work collaboratively with Horizons on urban development and growth planning. Council considers the key roles Horizons plays in effective growth planning and the development of our communities is through the provision of natural hazard information, regional transport planning, and consenting of infrastructure projects.

The development and provision of natural hazard information is essential to managing risks associated with natural hazards and climate change in relation to urban growth. Investment in regional public transport also has a strong influence on the ability for communities to adopt public transport options. As the regulator, the One Plan strongly influences consenting of major infrastructure projects required to service growth such as for wastewater treatment and disposal.

Council suggests consideration is given to adding clarity on the responsibilities and the intentions of the Regional Council in each of the methods.

A number of the methods identify specific actions. The diversity of urban areas within the regional means there is likely to be a range of approaches to achieving urban development goals. Therefore, Council recommends the methods are refined to remove reference to specific actions e.g. removal of reference to structure plans in Method 2.

Method 2 identifies the importance of strategic planning in meeting the objectives and policies of the chapter. Council agrees with the importance of strategic planning in meeting urban growth needs. Council considers local input is essential in effective strategic planning, and will become even more important under a reformed Resource Management system. Method 2 identifies the Regional Public Transport Plan as important for achieving active transport and public transport. Council encourages Horizons to place importance on providing public transport options for the towns in the Rangitikei District, and note innovative public transport options will be needed to meet the needs of our communities.

Decisions sought

- That the roles and responsibilities of the Regional Council and territorial authorities are clarified in each method.
- That the Regional Council commits to the commissioning of natural hazard information required to ensure the effective planning our towns and settlements in the Rangitikei.
- That the methods are refined to remove reference to specific actions, as there is likely to be a diversity of approaches suitable across the region e.g. (removal of specific reference to structure planning which might not be the most suitable approach in all situations).
- That greater acknowledgement is given to the role Horizons plays in consenting infrastructure projects, and consideration is given to how the wider One Plan operates in relation to consenting infrastructure projects that support urban growth.

Principal Reasons

Three principal reasons are set out which align back to the identified issues. Once amendments are made to the issues, this section will also need to be updated.

UFD-PR2 related to versatile soils has not been updated. In light of the recent release of the NPS-HPL this section should be either removed or updated.

Decisions sought

- That the principal reasons are updated to align with changes made to the issues, or other amendments made to the wider provisions associated with this plan change.
- Remove or update UFD-PR2 to reflect/align with the NPS-HPL.

Anticipated Environmental Results

A series of anticipated environmental results are set out. Council recommends that these are reviewed once amendments are made to the wider provisions to ensure alignment.

Decisions sought

- That the anticipated environmental results are reviewed to ensure alignment with the wider chapter.

Definitions

Council notes that additional definitions are included that align with those in the NPS-UD. Council supports the adoption of the definitions from the NPS-UD but suggest only referencing the NPS-UD (rather than copying the wording) to future proof against possible updates to the definitions in the NPS-UD.

Concluding comments

Thank you for the opportunity to submit on Proposed Change 3 (Urban Development). Council welcomes the opportunity to work collaboratively with Horizons throughout the plan change process.

Naku noa,



Andy Watson
Mayor of the Rangitikei



Peter Beggs
Chief Executive