

Proposed Plan Change I: Increasing Housing Supply and Choice

RMA 1991 SCHEDULE 1, CLAUSE 3B RESPONSE TO CONSULTATION ON THE PREPARATION OF PLAN CHANGE I BY PALMERSTON NORTH CITY COUNCIL

FOR PALMERSTON NORTH CITY COUNCIL

OCTOBER 2024



Te Ao Turoa Environmental Centre

Rangitāne o Manawatū

Te Papaioea › Palmerston North

Cover photo: *Manawatū Awa Puanga Celebration, Ahimate Pā site looking across to Turitea, 2020. Photo credit Rangitāne o Manawatū - Palmerston North City Council Te Ohunga Mauri Awa Framework Committee.*

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1. Introduction or background

Palmerston North City Council ('the Council' or 'PNCC') is preparing *Proposed Plan Change I: Increasing housing supply and choice* ('PC:I' or 'Proposed Plan Change I') to the Operative District Plan, to enable greater density, housing choice and supply in parts of the existing residential area of the City.

As required by Schedule 1, Clause 3B of the RMA 1991, the Council has consulted with us, as a representative body of the Nation of Rangitāne o Manawatū, during the preparation of the plan change. This is our response to that consultation. The Council requested that Rangitāne o Manawatū provide a cultural impact assessment of the proposed changes to the District Plan to give effect to the NPS-UD (Proposed Plan Change I). However insufficient time and resourcing was available to undertake such an assessment prior to notification of the plan change.

The National Policy Statement on Urban Development 2020 ('NPS-UD') applies to all local authorities that have urban environments within their district. Palmerston North City is a Tier 2 urban environment, and the City Council is a Tier 2 local authority. The NPS-UD directs the Council to make changes to the District Plan to give effect to the provisions in the NPS-UD. As a Tier 2 territorial authority, the Council must comply with Policy 5 of the NPS-UD by proposing a plan change no later than two years after the date the NPS-UD commenced¹.

Proposed Plan Change I is intended to give effect to Policy 5 of the NPS-UD. Policy 5 is about enabling intensification in existing urban areas:

Policy 5: 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.*

Proposed Plan Change I focuses on residential intensification (rather than intensification for business uses). This intensification must be undertaken in a way that maintains 'well-functioning urban environments'. A 'well-functioning urban environment' is defined in the NPS-UD as:

urban environments that, as a minimum:

- (a) have or enable a variety of homes that:*
 - (i) **meet the needs, in terms of type, price, and location, of different households; and***
 - (ii) **enable Māori to express their cultural traditions and norms; and***

¹ The date of commencement was August 2020, see clause 1.2, NPS-UD

- (b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) *support reductions in greenhouse gas emissions; and*
- (f) *are resilient to the likely current and future effects of climate change².*

Objective 1 of the NPS-UD provides that ‘Well-functioning urban environments’ are environments that “*enable all people and communities to provide for their social, economic and **cultural well-being**, and for their health and safety, now and into the future*”.

(bold is our emphasis)

1.1. What does Plan Change I cover?

The Council has explained to us that it’s intention is that Proposed Plan Change I will add a new Medium Density Residential Zone (MDZ) to the District Plan, which will apply in particular parts of the city. It will enable development of housing up to three stories high and three units per site as a permitted activity, provided certain performance standards are met.

For developments of more than three units, resource consent will be required (as a restricted discretionary activity) but the overall intent of the zone and implementing provisions will be to encourage residential intensification.

Outside of the proposed Medium Density Residential Zone, the Council proposes to make some changes to the existing multi-unit housing rules to bring this into line with the provisions in the Medium Density Residential Zone.

The extent of the zone is based on proximity to neighborhood/city centers and key amenities, such as schools and open space.

1.2. What is the purpose and scope of this document?

The Council asked Rangitāne o Manawatū, as tangata whenua of the city, to prepare a Cultural Impact Assessment of Proposed Plan Change I. Due to budget and time constraints, it has not been possible for Rangitāne to prepare a Cultural Impact Assessment prior to public notification of the plan change. Instead, this document identifies the information that is needed to properly inform such an assessment, the sufficiency of the information available at the current time, along with any risks that such information gaps raise. It also includes feedback on the draft plan change provisions. This feedback has occurred as an iterative process. We were provided with draft provisions for comment on the 6 September 2024, and subsequently prepared an earlier draft of this report in response. Following receipt of our report, the Council proposed some

² Policy 1, NPS-UD

amendments to the provisions, which were provided to us for further comment in early October. This version of the report includes our earlier comments, and feedback on the latest set of amended provisions. Rangitāne reserves the right to amend this feedback in light of any additional information that may become available through the plan change process.

This document addresses:

- The legislative and statutory context which inform's Rangitāne interests in the plan change process;
- Rangitāne key issues of concern with respect to the proposed plan change;
- What information is needed to respond to those concerns;
- Our initial feedback (without prejudice) on the draft plan provisions, provided to us on 6 September 2024, and further feedback on the revised draft plan provisions, provided to us on the 11 October 2024.

1.2.1. Assumptions and limitations

Rangitāne o Manawatū have an iwi leadership rūpū who are connected to the various Rangitāne representative bodies and provide direction to kaimahi on iwi matters. This document is endorsed by this rūpū. The opinions of some individual hapū and whānau members may differ from those expressed in this document.

2. Rangitāne o Manawatū Nation of whānau, hapū, iwi

Rangitāne ancestors arrived in Aotearoa aboard the Kurahaupō waka over 30 generations ago. Whatonga was a navigator of the waka and is the eponymous ancestor whom we, the people of Rangitāne, trace our lineage. He settled in the Heretaunga area (Hawke's Bay) and explored a large part of Aotearoa. Rangitāne was the grandson of Whatonga, whose descendants occupy the Manawatū and other areas of the lower North Island and the top of the South Island today. At the turn of the 19th Century, Rangitāne and Rangitāne whānaunga had held mana over nearly the entire drainage basin of the Manawatū Awa for many hundreds of years. The Rangitāne o Manawatū Statutory Area of Interest³ is outlined in Figure 1 below.

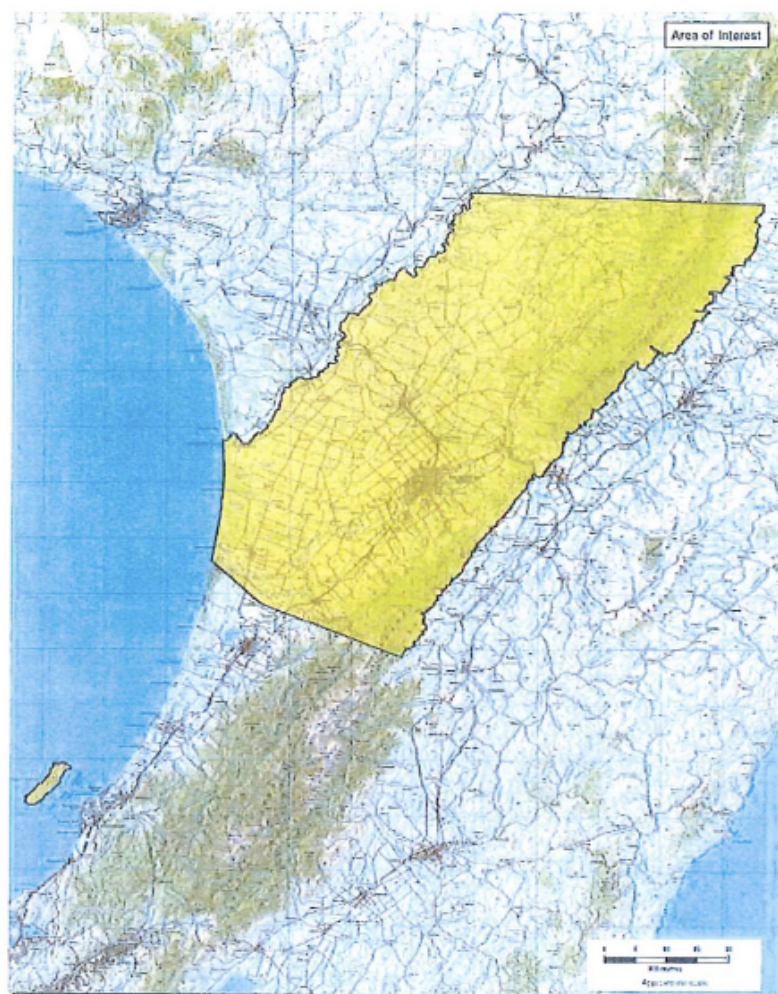


Figure 1: Rangitāne o Manawatū Statutory Area of Interest

³ The statutory area of interest comprises the area bordered by: a) to the north-west, a line from the southern bank of the mouth of the Rangitikei River inland to the Orangipango Trig near Ohingaiti, b) to the north, a straight line from the Orangipango Trig near Ohingaiti to Te Hekenga, c) to the south-east, a line following the ridge/summit along the Ruahine and Tararua ranges across to the Taramea Trig, d) to the south-west, a line from Taramea Trig westward to the mouth of the Manawatū River, e) to the west, a line around the coast from the mouth of the Manawatū River northward to the mouth of the Rangitikei River.

This cultural and customary connection encompasses 440,000 ha of the plains divided by the Manawatū River and its tributaries and includes the city of Te Papaioea (Palmerston North).

Traditional entry to the Manawatū interior was gained by paddling and poling waka along the Manawatū Awa. At each major river bend, a permanent or seasonal village or pā existed within our history⁴, ⁵. The awa linked hapū (family groups) together to form our identity, now known as Rangitāne o Manawatū.

Life centred around the awa, its tributaries, lakes and wetlands, which came to shape the worldview and values system of our iwi today.^{6,7} Our worldview is based on the holistic principle that all elements are interconnected. Ecosystems within our environment rely on many elements, both physical and spiritual, at many scales to function effectively. When one part of that system is interrupted, disturbed, or impacted, Te Ao Māori becomes imbalanced, affecting its functionality, which in turn influences the health and well-being of that environment and us as people.

Whakapapa (our genealogy) and mātauranga Māori (our traditional and contemporary knowledge) inform our understanding of and connection to the environment. Every part of the environment has a common genealogy descending from a common ancestor. The principal ancestor is Io Matua Te Kore (the parentless one), who existed in Te Kore (the realm of potential being). Then descended Ngā Pō (the many nights), Ranginui, and Papatūānuku (Sky Father and Earth Mother). The separation of Rangi and Papa by their children brought forth Te Ao Mārama (the world of light in which we live). This whakapapa places us as descendants of the environment they inhabit. It reinforces our identity and a deep connection to our lands.

This mātauranga links us to the world, creating an inseparable bond and a responsibility to protect the environment from misuse. We have affirmed mana whenua over the area of which Te Papaioea sits for hundreds of years, thus have a deep connection to the life-giving resources of the land and waters.

Rangitāne o Manawatū are a collective of six hapū:

- Ngāti Mairehau (also known as Ngai Tuahuriri)
- Ngāti Te Kapuarangi
- Ngāti Hineaute
- Ngāti Te Rangitepaia (also known as Ngāti Rangi)
- Ngāti Te Rangiaranaki
- Ngāti Tauira a Rangitāne – Ngāti Apa hapū

⁴ Taylor & Sutton (1999). Inventory of Rangitāne Heritage sites in Palmerston North City, 1999. Palmerston North City Council.

⁵ Tanenuiarangi Manawatū Inc (1999). Rangitāne Mahinga Kai Project. Palmerston North.

⁶ McEwen, J.M. (1986). Rangitāne: A tribal History. Reed Books: Auckland.

⁷ Wai 182, Rangitāne o Manawatū. Tanenuiarangi Manawatū Incorporated Office of Treaty Settlements.

In a contemporary context we are partners with the Council and take leadership on cultural matters within the city. Kaitiakitanga is the inherent obligation and responsibility we have as tangata whenua of this area, to nurture and protect, restore, and enhance the mauri of our environment and manaaki our citizens and future generations.

2.1. Tanenuiarangi Manawatū Charitable Trust

Tanenuiarangi Manawatū Charitable Trust (TMCT) is a representative body of the nation of Rangitāne o Manawatū. It includes Te Ao Turoa Environmental Centre (TATEC) which is part of Best Care (Whakapai Hauora) Charitable Trust and includes inter alia a collective of whānau ora, health and wellbeing services.

TATEC contributes to upholding kaitiakitanga on behalf of Rangitāne o Manawatū iwi (Rangitāne). TATEC are the authors of this document. We promote the health and well-being of our people, our community, the environment, wāhi tapu and taonga, including through engagement in planning processes, including plan changes and resource consenting.

We deliver a Rangitānenuirawa model of environmental management. This includes a framework called Te Ara Whānau Ora (the Whānau Ora Pathways Framework) which we use to identify and measure resource management outcomes for Rangitāne o Manawatū. Whānau Ora was originally developed by our esteemed kaumātua Sir Mason Durie and Whaea Dame Tariana Turia, who applied it to Māori health-focused services.

2.2. Rangitāne and PNCC Te Tiriti partnership

PNCC recognise Rangitāne as the tangata whenua in the city and within PNCC territorial boundaries. This is stated in the Palmerston North District Plan⁸. Our contemporary Rangitāne o Manawatū organisations and PNCC have worked together for over 30 years on important decisions about land, water, significant sites and other areas of mutual interest that impact our city. The relationship has been intergenerational and has been passed on from our kaumātua to our current leaders.

Rangitāne o Manawatū and PNCC have a formal partnership agreement⁹ that sets out protocols such as Rangatira ki te Rangatira (recognition of each party's leadership) and how Rangitāne participate in policy development and regulatory processes (amongst other matters).

Our Partnership Agreement describes the commitment to work together in partnership and identifies principles to achieve this. These are summarised below:

- 1) Each party recognises the autonomy and right of the other to exercise their respective authority and meet their responsibilities;
- 2) Each party agrees that the principles of Te Tiriti o Waitangi (partnership, protection and participation) will be the basis for engagement. They are:

⁸ Section 3.2 Tangata Whenua of Palmerston North

⁹ Rangitāne o Manawatū-PNCC partnership agreement

- a) Act reasonably, honorably and in good faith, ensuring the strategic relationship is respected and has integrity;
- b) Recognise that all parties can contribute, for mutual benefit, in deciding the future of the city, including through planning, development and delivery of services;
- c) Actively protecting and acknowledging the taonga of Rangitāne and safeguarding cultural concepts, values and practices.

3. The Statutory Context

This section sets out the statutory context for our involvement, as tangata whenua, in the preparation of PCI.

3.1.1. Resource Management Act (RMA) 1991

The Council has a number of statutory duties under the RMA with respect to how it provides for Rangitāne interests, obligations and connections with te taiao, in the preparation of changes to the District Plan.

3.1.1.1. Part 2 Matters

In exercising its powers and functions, which include making changes to the District Plan to manage the use, development and protection of natural and physical resources, the Council is required to:

recognise and provide for:

“the relationship of Maori and their culture and traditions with their ancestral lands, waters, sites, wahi tapu, and other taonga” (s6e)

the protection of historic heritage from inappropriate subdivision, use, and development (s6f):

have particular regard to:

kaitiakitanga (s7a), and

take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) (s8).

The definition of ‘historic heritage’ includes ‘sites of significance to Māori, including wāhi tapu’.

3.1.1.2. S74 and S75 - preparing and changing a District Plan

We (TATEC) have prepared a “relevant planning document” which has been endorsed by Tanenuiarangi Manawatū Charitable Trust (the document has been recognised by the iwi authority and lodged with the Council). The *Rangitāne o Manawatū Environmental Management Plan* (EMP) must be taken into account by the Council when it prepares a change to the District Plan, where the content of the EMP “has a bearing” on the resource management issues covered by the change¹⁰.

The content of the EMP is relevant to a number of the resource management issues addressed in Plan Change I, as discussed in section 5 of this document.

Under s75(3) a district plan must give effect to any national policy statement. Under s74(1) the Council is directed to change its district plan in accordance with a national policy statement. The purpose of Plan Change I is to give effect to the National Policy Statement on Urban Development 2020. Relevant provisions in the NPS-UD are discussed in section 3.3.1.

¹⁰ Section 74(2A)

Although not a plan change to give effect to the NPS for Freshwater Management 2020, there are provisions in that NPS that are relevant to Plan Change I.

3.1.1.3. Schedule 1: Preparation, change, and review of policy statements and plans

During the preparation of a proposed plan change, the Council must consult the tangata whenua of the area who may be affected, through iwi authorities¹¹. Rangitāne are the tangata whenua of Te Papaioea, and TMCT are the authority through which consultation should take place.

Schedule 1 Clause 3B provides more detail on the nature of that consultation. Consultation is considered to have taken place if the Council:

- (a) considers ways in which it may foster the development of their capacity to respond to an invitation to consult; and*
- (b) establishes and maintains processes to provide opportunities for those iwi authorities to consult it; and*
- (c) consults with those iwi authorities; and*
- (d) enables those iwi authorities to identify resource management issues of concern to them; and*
- (e) indicates how those issues have been or are to be addressed.*

This document identifies the resource management issues of concern to us, as tangata whenua.

3.2. Rangitāne o Manawatū Settlement Act 2016

The statutory acknowledgements in the Rangitāne o Manawatu Claims Settlement Act 2016 require Council to provide Rangitāne o Manawatu with summaries of all resource consent applications that may affect the areas named in their acknowledgements, prior to decisions being made on those applications. The Manawatū River and its tributaries are of interest (see Figure 1) encompasses the area subject to Proposed Plan Change I.

¹¹ Schedule 1, Clause 3(1)(d)

3.3. National Policy Direction

3.3.1. National Policy Statement on Urban Development 2020 (NPS-UD)

As set out above, the purpose of Proposed Plan Change I is to give effect to the NPS-UD 2020.

The following provisions are particularly relevant to, and have informed our feedback on the draft plan change:

Provision	Relevance
<i>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</i>	PC:I should deliver an urban environment that enables our Māori communities to provide for their social, economic and cultural wellbeing, and for their health and safety, both now, and in the future.
<i>Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</i>	The Council should prepare PC:I and involve Rangitāne in its development, in a manner that reflects the principles of the <i>Treaty of Waitangi (Te Tiriti o Waitangi)</i> .
<p><i>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</i></p> <p><i>(a) have or enable a variety of homes that:</i></p> <p><i>(i) meet the needs, in terms of type, price, and location, of different households; and</i></p> <p><i>(ii) enable Māori to express their cultural traditions and norms; and</i></p> <p><i>(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</i></p> <p><i>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</i></p> <p><i>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</i></p> <p><i>(e) support reductions in greenhouse gas emissions; and</i></p>	PC:I should enable a variety of types of homes, in the locations that Māori wish to live, that cater for our Māori communities and their needs, which are accessible, resilient, and which enable us to express our cultural traditions and norms. Those places should be resilient to climate change.

(f) are resilient to the likely current and future effects of climate change.

Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:

- (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and*
- (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and*
- (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and*
- (d) operate in a way that is consistent with iwi participation legislation.*

Policy 9 requires Council to involve Rangitāne in the preparation of PC:I. It must undertake effective consultation and take into account our values and aspirations for urban development. If we wish to be involved in decision making on consents issued in response to the provisions of the plan change, it must provide opportunities for us to do so, where these consents have potential to impact on our sites of significance and issues of cultural significance.

3.3.2. National Policy Statement on Freshwater Management 2020 (NPS-FM)

The following provisions are particularly relevant to, and have informed our feedback on the draft plan change:

Provision	Relevance
<p><i>2.1 Objective</i></p> <p><i>(1) The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</i></p> <p><i>(a) first, the health and well-being of water bodies and freshwater ecosystems</i></p> <p><i>(b) second, the health needs of people (such as drinking water)</i></p> <p><i>(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</i></p>	<p>The effects of urban intensification on freshwater, should be considered and addressed through PC:I.</p> <p>Policy direction should be included in PC:I to improve degraded water bodies, prevent their further deterioration and avoid further loss of values.</p>
<p><i>Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.</i></p>	
<p><i>Policy 2: Tangata whenua are actively involved in freshwater management (including decision- making processes), and Māori freshwater values are identified and provided for.</i></p>	
<p><i>Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.</i></p>	
<p><i>Policy 5: Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.</i></p>	

Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.

Policy 7: The loss of river extent and values is avoided to the extent practicable.

Policy 9: The habitats of indigenous freshwater species are protected.

Policy 13: The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.

Policy 15: Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with this National Policy Statement.

3.3.3. Manawatū-Whanganui Regional Policy Statement ('One Plan')

The following provisions are particularly relevant to, and have informed our feedback on the draft plan change:

Provision	Relevance
<p>RMIA-01: Resource management</p> <p>RMIA-01: Te whakahaere rauemi</p> <p>1. To have regard to the mauri* of natural and physical resources*^ to enable hapū* and iwi* to provide for their social, economic and cultural wellbeing.</p> <p><i>Kia aro atu ki te mauri o ngā rauemi māori - ōkiko hoki - hei oranga hapori, ōhanga hoki, tikanga hoki mō ngā hapū me ngā iwi.</i></p> <p>2. Kaitiakitanga^ must be given particular regard and the relationship of hapū* and iwi* with their ancestral lands*, water*, sites*, wāhi tapu* and other taonga* (including wāhi tūpuna*) must be recognised and provided for through resource management processes.</p> <p><i>Ka mate ka tino arohia te kaitiakitanga, ā, ka mate ka whakamanatia te hononga o ngā hapū me ngā iwi ki ō rātou whenua tūpuna, wai, papa, wāhi tapu hoki me ētahi atu taonga (pērā i ngā wāhi tūpuna), ā, ka whakaratonga mā ngā tukanga whakahaere rauemi.</i></p>	<p>To enable Rangitāne to provide for our social, economic and cultural well-being, the provisions in PC:I should contribute to improving the mauri of the whenua and wai within the MDZ and the wider environment, and provide opportunities to restore our connections with our ancestral lands, water and sites. We need a management framework, developed in partnership with us, for our sites of significance that may be adversely impacted by development enabled by the plan change.</p>
<p>RMIA-P2: Wāhi tapu*, wāhi tūpuna* and other sites* of significance</p> <p>RMIA-P2: Ko ngā wāhi tapu, wāhi tūpuna hoki me ētahi atu papa hirahira</p> <p>1. Wāhi tapu*, wāhi tūpuna* and other sites* of significance to Māori identified:</p> <p>a. In the Regional Coastal Plan and district plans^,</p> <p>b. as historic reserves under the Reserves Act 1977,</p> <p>c. as Māori reserves under the Te Ture Whenua Māori Act 1993,</p> <p>d. as sites recorded in the New Zealand Archaeological Association's Site Recording Scheme, and</p> <p>e. as registered sites under the Heritage New Zealand Pouhere Taonga Act 2014</p> <p>must be protected from inappropriate subdivision*, use or development that would cause adverse</p>	

effects on the qualities and features which contribute to the values of these sites*.*

Kua tautuhia ngā wāhi tapu me ngā wāhi tūpuna me ētahi atu wāhi hirahira ki te Māori:

- a. kei roto i te Mahere Takutai ā-Rohe me ngā mahere ā-takiwā,*
- b. hei Historic Reserves i raro i te Reserves Act 1977,*
- c. hei Māori Reserves i raro i Te Ture Whenua 1993,*
- d. hei wāhi kua rēhitatia mā te Site Recording Scheme o te New Zealand Archaeological Association, ā*
- e. hei wāhi kua rēhitatia i raro i te Heritage New Zealand Pouhere Taonga Act 2014*

ka whakamarumarutia i te hē o te wehewehe whenua, te whakamahi whenua, whakaahu whenua rānei e puta ai pea he pānga kino ki ngā painga me ngā āhuatanga ka pā ki te ūara o ēnei wāhi.

HCV-O1: Historic heritage*

Protect historic heritage from activities that would significantly reduce heritage qualities.*

HCV-P1: Historic heritage*

The Regional Coastal Plan^ and district plans^ must, without limiting the responsibilities of local authorities to address historic heritage under the RMA, include provisions to protect from inappropriate subdivision*, use and development historic heritage* of national significance, which may include places of special or outstanding heritage value registered as Category 1 historic places, wāhi tapu, and wāhi tapu areas under the Historic Places Act 1993 and give due consideration to the implementation of a management framework for other places of historic heritage*.*

3.3.4. Operative Palmerston North District Plan

The Operative District Plan identifies that, in the development and application of the District Plan, tangata whenua are not another interest group, but are acknowledged as having a significant and special relationship with the Council by virtue of them being tangata whenua (Section 3.3, pg 4).

The following provisions are particularly relevant to and have informed our feedback on the draft plan change. These provisions direct that our sites of cultural and natural heritage value should be identified and protected, and measures implemented to prevent development from adversely impacting on these values.

Objectives	Policies
Section 3: Tangata Whenua and resource management	
Objective 1: To acknowledge Rangitane o Manawatu as Tangata Whenua within Palmerston North City.	1.4 To follow Rangitanenuiarawa in resource management processes which Rangitane o Manawatu are involved in.
Objective 2: To ensure that consultation is undertaken with Tangata Whenua on resource management issues.	2.1 To consult early on with Tangata Whenua, including Rangitane o Manawatu, in resource management processes.
	2.2 To consult Tangata Whenua with regard to the identification of and appropriate protection of urupa, wahi tapu, wahi tupuna and other sites.
	2.3 To ensure ongoing consultation and communication is maintained with regard to resource management issues of particular concern to Tangata Whenua.
Objective 3: To enable Tangata Whenua institutions to develop within Palmerston North City.	3.1 To provide for the development of marae, urupa, papa kainga, kohanga reo and kura and other forms of cultural institutions in the City.
Objective 4: To actively protect sites of cultural, historic and natural significance to Tangata Whenua.	4.1 To contain provisions within the District Plan which facilitate tino rangitiratanga and kaitiakitanga of Tangata Whenua, in relation to sites and objects of cultural, historic and natural heritage value to Tangata Whenua.
Section 17: Cultural and Natural Heritage	
Part B, Objective 1: To facilitate the Tino Rangitiratanga and Kaitiakitanga of Tangata Whenua in relation to sites and	1.1 To work with Tangata Whenua to identify sites and objects of significant cultural and

<p>objects of cultural and natural heritage value to Tangata Whenua</p>	<p>natural heritage value to Tangata Whenua, according to the criteria listed in Appendix 17E.</p> <p>1.2 To protect identified sites and objects of significant cultural and natural heritage value to tangata whenua.</p> <p>1.3 To avoid, remedy or mitigate the effects of activities or development which could disturb or destroy the intrinsic cultural and natural heritage values associated with an identified site or object.</p> <p>1.4 To consult Tangata Whenua regarding the identification, protection and management of sites and objects considered to be of cultural and natural heritage value.</p>
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3.3.5. Rangitāne o Manawatū Environmental Management Plan, 2021 ('EMP')

The EMP includes a number of principles and key outcomes, and how these outcomes can be given effect to. The principles, outcomes, and how these can be given effect to, must be taken into account when the Council is preparing Proposed Plan Change I. The relevant principles have informed our position on the key resource management issues of concern to us. At a higher level, the principle of Rangitiratanga is relevant to the design and preparation of Proposed Plan Change I.

The relevant content of the Rangitāne EMP that should be taken into account

Note: The principles identified below are not the only principles relevant to these topics. We consider all principles must be achieved holistically to give effect to the Whānau Ora Framework.

Principle	Key Outcomes	Giving effect to these outcomes (as per the EMP)
Design and development of the Plan Change		
Rangitiratanga Self-managing and empowered leaders	Rangitāne o Manawatū (RoM) exercise Tino Rangitiratanga by collaborating in planning and governance within the rohe of RoM.	<ul style="list-style-type: none"> Councils resource Rangitāne as its Treaty Partner to participate meaningfully and early in Plan Change processes. Plan Changes by design are responsive to Rangitāne priorities. Rangitāne tikanga is understood and incorporated into Council practice and plan changes.
Provision of housing		
Kotahitanga (Participating fully in society)	Whānau need access to warm, dry, affordable housing and quality education to be able to participate fully in society and reach their potential. Environmental Management should be outcomes led.	<ul style="list-style-type: none"> Whānau can afford to buy and rent houses, in locations that allow them to fully interact within the community.

Management of stormwater		
Tiaki Taiao (responsible stewards of their living and natural environments)		<ul style="list-style-type: none"> • Mauri is the life force of all living and non-living things. Excess use, damage or contamination to the environment will affect the mauri that it possesses. • Ki uta ki tai is a whole-of landscape approach, understanding and managing interconnected resources and ecosystems from the mountains to the sea. • Whānau exercise Rangitānenuirawa and kaitiakitanga over their natural environment and waterways, protecting the environment for future generations.
Hauoranga (leading healthy lifestyles)	<i>Hauoranga outcomes are dedicated to ensuring that the physical and spiritual health of whānau is provided for and is integrated within resource management; that whānau can safely access the landscapes and waters that their tupuna once could; that they can practice their culture and provide for their tikanga.</i>	<ul style="list-style-type: none"> • Whānau are able to support their hinengaro, wairua and physical wellbeing.
Managing risks of natural hazards		
Pāporitanga (Cohesive, resilient and nurturing)		<ul style="list-style-type: none"> • Emergency response and natural disaster resiliency
Hauoranga (leading healthy lifestyles)	<i>Hauoranga outcomes are dedicated to ensuring that the physical and spiritual health of whānau is provided for and is integrated within resource management; that whānau can safely access the landscapes and waters that their tupuna once could; that they can practice their</i>	<ul style="list-style-type: none"> • Whānau are able to support their hinengaro, wairua and physical wellbeing.

	<i>culture and provide for their tikanga.</i>	
Green space and vegetation		
Tiaki Taiao (responsible stewards of their living and natural environments)		<ul style="list-style-type: none"> • Mauri is the life force of all living and non-living things. Excess use, damage or contamination to the environment will affect the mauri that it possesses. • Ki uta ki tai is a whole-of landscape approach, understanding and managing interconnected resources and ecosystems from the mountains to the sea. • Whānau exercise Rangitānenuirawa and kaitiakitanga over their natural environment and waterways, protecting the environment for future generations.
Hauoranga (leading healthy lifestyles)	<i>Hauoranga outcomes are dedicated to ensuring that the physical and spiritual health of whānau is provided for and is integrated within resource management; that whānau can safely access the landscapes and waters that their tupuna once could; that they can practice their culture and provide for their tikanga.</i>	<ul style="list-style-type: none"> • Whānau are able to support their hinengaro, wairua and physical wellbeing.
Sites of significance and our connection with wai		
Hauoranga (leading healthy lifestyles)	<i>Hauoranga outcomes are dedicated to ensuring that the physical and spiritual health of whānau is provided for and is integrated within resource management; that whānau can safely access the landscapes and waters that their tupuna once could; that they can practice their</i>	<ul style="list-style-type: none"> • Whānau are able to support their hinengaro, wairua and physical wellbeing. • Whānau have access to and can safely interact with wai, whenua, taonga, and wāhi tapu.

culture and provide for their tikanga.

4. Our aspirations for urban development

Rangitāne aspirations for urban development and housing in Te Papaioea have been clearly articulated in our submission on the Future Development Strategy for Palmerston North. These aspirations are relevant to PC:I also, and have informed our feedback on the draft provisions.

A city with minimal environmental impact	Recognition that as human communities, our health relies on the health of te taiao and we must make as little negative impact as possible and strive to always improve and enhance our environment.
A city with a strong identity based on its own story	Rangitānenuirawa (Rangitāne practices and Mātauranga knowledge) and the stories and landscapes are a seamless part of the city's identity.
A city that embodies Te Tiriti partnership	Recognition that Rangitāne o Manawatū and PNCC are Te Tiriti partners. We must write the rules together and, where appropriate, iwi lead for iwi Māori, noting that tangata whenua has a role to awhi those who choose to make Te Papaioea their home.
A city that prioritises the mauri and health of waterbodies and connections to them	The mauri and health of the Manawatū Awa, its tributaries, lagoons and connections are protected and restored to secure the wellbeing of people interacting with them. Where appropriate, lost waterbodies are identified and restored.
Affordable, healthy and accessible housing options	Whānau live in homes that are affordable and that support their wellbeing. Mixed and holistic pathways to home ownership are available.
Māori development (including papakāinga, cultural hubs and new marae) is a readily available option	Homes are oriented towards communal spaces and a connection with wai, rongoa, maara, and marae with a collective kawa and tikanga that protects these shared spaces.

Te Mana o te Wai in the Manawatū

As tangata whenua of Te Papaioea, Rangitāne o Manawatū have a significant and deep connection to the land and waters of the Manawatū, and obligation to protect, enhance and restore the mauri for future generations.

Rangitāne o Manawatū sets out how Te Mana o te Wai applies in a statement in their Manawatū Environmental Management Plan:

The most significant quality that flows through wai is mauri. The mauri is generated throughout the catchment and is carried through the connected tributaries, groundwater, wetlands, and lagoons.

It is the most crucial element that binds the physical, traditional, and spiritual elements of all things together, generating, nurturing, and upholding all life, including that of Rangitāne o Manawatū. The health and well-being of Rangitāne is inseparable from the health and well-being of wai. The Manawatū, its catchment, tributaries and connections, wetlands and lagoons are taonga and valued for the traditional abundance of mahinga kai and natural resources.

5. The resource management issues in PC:I of concern to Rangitāne

This section of the document identifies the key resource management issues which are addressed in Proposed Plan Change I, our interests and current position on them, based on the plan change documents which have been shared with us to date.

Rangitāne support the purpose of Proposed Plan Change I, to enable residential intensification and greater housing choice. A physically safe environment with a 'sense of place' that is affordable and close to the community you identify with, is important to every individual and our society's well-being. However, we deeply care about the impact that urban intensification could have on our natural environment and the mauri of our whenua and wai must be upheld. We must work with wai not against it. We are intrinsically connected to te taiao (the natural environment) and living in a well-functioning urban environment is dependent on it.

Historical injustices (as acknowledged in the Rangitāne o Manawatū Claims Settlement Act (2016)) have left our people with hardly any land in the city. Loss of access to our traditional resources and source of income has been amplified by inequities that Rangitāne (and Māori in general) experience with respect to access to housing, health, education and incarceration. Our whānau and hāpori are concentrated in communities in the west of the city¹² – in a low lying, flood prone area with highly degraded ecosystems. Traditionally this was where we had a number of Rangitāne pā sites, due to proximity to the Manawatū Awa and the Awapuni lagoon/wetland networks. The Awapuni area for example has a significant number of archaeological areas identified by the New Zealand Archaeological Association.

Multi-generational living in these areas establishes a strong sense of place for our people, within a cohesive and connected community. It gives effect to our ability to express our cultural aspirations and norms. We want to continue living, working and being educated here. This means we need innovative and practical solutions to known issues such as poor ecologies, poor water quality, stormwater system capacity constraints and flood risk, so that our whānau can continue to remain and grow in their community and continue to practice their culture. Such solutions are needed to ensure that inequities that currently exist are not continually perpetuated into the future. In our submission on the draft Palmerston North Future Development Strategy (FDS), we requested that the western side of Te Papaioea be prioritised for investment in enabling infrastructure, especially infrastructure to address the known stormwater constraints.

New housing, in places safe from natural hazards and using quality building standards that prioritise healthy homes, are essential to lifting Māori and Pacifica living standards. Providing for growth within and adjacent to our largest Māori/Pacifica population in Te Papaioea is vital to the future prosperity of this community in the city.

5.1. Provision of housing

Our submission on the FDS highlighted disparities in the statistics relating to housing and economic prospects of our communities in the west, compared to the rest of the city and

¹² In the suburbs of Awapuni North and South, Highbury East, Takaro South and North, Park West, Westbrook and West End.

Aotearoa/New Zealand as a whole. Our communities in the west have generally lower income and higher rates of unemployment, housing stock that (anecdotally) is typically in poorer condition, cold and damp, and subject to over-crowding. Population projections in the Palmerston North Housing and Business Development Capacity Assessment 2023 indicate that while the aging European population will increase the number of one and two person households in the city, the growth in Pasifika and Māori families (the Māori population is expected to increase by 3.6% by 2054) will result in an increase in multi-generational and larger households in the city. This contrasts with the projected decrease in the European population (5.4% by 2054).

City wide, the Māori community is now the fastest growing community in Te Papaioea¹³, and is also very young.

With multi-generational and larger households projected to increase, and housing already subject to over-crowding, our FDS submission argues that Awapuni North and South, Highbury East, Takaro South and North, Park West, Westbrook and West End should be prioritised for affordable housing growth. Through the Partnership Agreement and as Te Tiriti partners, PNCC have a responsibility to enable opportunities that reduce housing inequalities for Māori communities.

Proposed Plan Change I provides an opportunity to provide housing stock that responds to the needs of our aging population. We support the enablement of smaller dwelling units for our kaumātua and young whānau. Such housing should also be designed so that it is suitable and accessible for our disabilities community. We support the provision of these housing choices near to services and community facilities that promote healthy and independent living, near public transport routes, accessible green spaces and community facilities.

Rangitāne is concerned that the Plan Change is not underpinned by any assessment or statistical analysis of the current state of housing stock and whether that is meeting the needs of our Māori communities. The section 32 report states “There is no specific information currently available about the level of housing demand for Māori. This is a future action for the next version of the HBA and the FDS.” Rangitāne consider this information should have been available to inform development of PC:I, given the geographical extent of the plan change includes significant Māori communities and that the purpose of the plan change is to give effect to the NPS-UD, including Māori aspirations for urban development.

5.1.1. Papakainga

We support the proposal to enable papakāinga developments within the Medium Density Zone, and to treat them on an equal footing to other residential developments. The first draft of the provisions were somewhat unclear as to the activity status of such developments, but this matter has subsequently been addressed in the updated provisions. We would like to see this enablement of papakāinga extended to the Residential zone, but the Council has advised that amending the activity status of papakāinga within the Residential Zone is beyond the scope of PC:I. The Council have told us that a review of Chapter 10 is anticipated in the next couple of years.

¹³ Palmerston North Housing and Business Development Capacity Assessment 2023. Amended version March 2024

The operative definition of papakāinga in the District Plan is uncertain as to the types of activities it encompasses; and restrictive in its references to particular forms of land tenure. Rangitāne request an amendment to the definition of papakāinga in Section 4 of the plan be included in the plan change, so that the definition is not unnecessarily restricted to certain land tenures. After all, all land was once Māori land and papakāinga living is a way Māori can continue to reconnect with their culture. The definition should also acknowledge that such developments may include ancillary communal and social facilities.

We request the following definition is proposed to be inserted to replace the operative district plan definition:

Papakāinga means one or more dwellings and associated social, cultural and economic activities established on **ancestral land** by an iwi, hapū or whānau of the Palmerston North District that enables the occupation of that land by members of the same whānau, hapū or iwi. For the purposes of this definition, **ancestral land** means:

Maori Land as defined under Te Ture Whenua Maori Land Act 1993; or

Land returned via Treaty Settlement Claims process; or

Land procured via Treaty Settlement Claims process; or

General Land owned by Maori, as defined under Te Ture Whenua Maori Land Act 1993.

5.2. Management of Stormwater

We are significantly concerned about stormwater and how that will be managed through the plan change. We note the following from the draft stormwater technical report:

“In the areas identified for intensification, the existing stormwater pipes vary significantly in capacity with some areas likely not meeting the level of service requirements for the current development let alone further developments.”

Urban intensification will result in less green space and more hardstand surfaces throughout the city, which will exacerbate existing flood risk and stormwater contamination. We are also very distressed that the draft s32 report identifies that climate change may increase intrusion of stormwater into our wastewater networks, with the potential for environmental damage and emergency discharges into our awa¹⁴.

There are minimal spaces within the city to provide for stormwater interventions and currently no strategic stormwater strategy for the city.

The issues around stormwater and flood risk from urban waterways require significant whole-of-catchment solutions. The problems relating to flood risk are greatest in the west of the city where our Māori/Pacifica communities are situated. This constraint has the potential to significantly impact on the capacity for intensification in this area, further exacerbating the inequalities that already exist.

¹⁴ S32 Report, Section 5.4 Responding to climate change, pg 41

Water quality in our urban waterways is poor and prevents us from interacting with wai and undertaking our cultural practices. This has an adverse impact on our cultural well-being. Water quality of urban waterways should be purposefully protected and improved through Proposed Plan Change I in line with the policy direction in the NPS-FM 2020. We support the PC:I policy direction to mitigate the use of copper or zinc building materials. The first version of the provisions was unclear as to how this policy direction would be implemented through the rules. We support the inclusion of proposed Rule MRZ-R23 in the October version of the provisions, and request that this rule is redrafted either as a restricted discretionary rule, or as a performance standard on all relevant construction and alteration of buildings rules (see section 7 below for further details).

Further intensification in the city should not be addressed on an ad hoc and reactive basis through site specific hydrological assessments for individual consent applications alone. On-site measures are only part of the solution. We also need catchment based solutions to unlock growth and clean up water quality. We are not convinced that the plan change is supported by sufficient evidence that individual rainwater tanks and impermeable surface limits will be effective in mitigating stormwater and flood risk over the long term. We note the following potential issues with pervious paving:

“The real concern with infiltration practices is with their long term functioning, as infiltration practices have a fairly high failure rate and, therefore, will have a shorter life span than other types of stormwater practices.”¹⁵

“Pervious pavement is highly susceptible to clogging from sediments. High sediment generating areas which discharge onto pervious paving surfaces will clog regularly, causing failure of the device. Standing water can result from seasonal high water tables. Check ground water levels and geology/ soils before making a decision to use pervious paving as a stormwater management approach”¹⁶.

We are alarmed that the proposed provisions rely on future home-owners to maintain this infrastructure in perpetuity. Homeowners will install further hard surfaces within their properties over time without seeking resource consent and may disconnect or fail to maintain rainwater tanks unless regular inspections enforce this. There is no mention of compliance monitoring in the methods section of the plan change provisions.

This is a concern given:

“The costs associated with the maintenance of rain tanks include: yearly tank inspections, cleanouts and replacement of filters, electrical work on pumps and replacement of pumps as well as a potential cost for council inspections on private rain tanks. The latter is required due to the ease and frequency of rain tank inflows being disconnected, tanks being removed,

¹⁵ Ira, S & Simcock, R. *Understanding Costs and Maintenance of WSUD in New Zealand. Activating WSUD for Healthy Resilient Communities*. July 2019, pg 26. Accessed at: <https://www.landcareresearch.co.nz/assets/Discover-Our-Research/Environment/Cities-settlements-communities/understanding-costs-and-maintenance-of-wsud-in-nz.pdf>

¹⁶ Ibid, pg 61

drawdowns failing and potential mistakes in plumbing that can occur with dual-purpose tanks used to supply toilets. ¹⁷

Our strong preference is that stormwater infrastructure solutions to enable intensification in the MDZ are catchment or sub-catchment level and Council controlled (rather than on private property). This increases the likelihood of adequate maintenance and renewal. Catchment level management plans should be informed by a strategic Stormwater Strategy, with investment programs to implement the strategy identified in the Long-Term Plan. Until such time as the Stormwater Strategy is prepared and catchment-level solutions identified, we appreciate that site specific assessments (and potentially on-site management) will be necessary. In our initial feedback we requested that the provisions be drafted so that the site specific assessments are required to demonstrate how any on-site mitigation will connect into and align with the catchment or sub-catchment solution, once those catchment plans have been prepared. We are supportive of the amendment that has subsequently been made to address this point in Proposed Rule MRZ-R10, and the use of a Stormwater Overlay and restricted discretionary activity status to identify areas where such assessments will be required.

At a more strategic level, Proposed Plan Change I should be supported by the identification of:

- new stormwater reserves (vested in Council) to create more capacity in the systems prone to flooding;
- a network of sub catchment water quality treatment interventions to improve water quality;
- restoration actions to improve degraded urban waterways; and
- updates to the development contributions policy to ensure adequate funding for provisioning and maintenance of this infrastructure.

5.3. Natural hazard risk

Minimum floor levels (in concert with on-site stormwater mitigation measures) are only part of the solution to flood risk. We need to think more strategically as a city, including giving our urban waterways room to move on their floodplains and developing more stormwater basins. The current risk of flooding to our community is unacceptable and actions must be taken urgently to address this. These risks will be exacerbated with climate change, as identified in the s32 report, which indicates that annual precipitation and expected rainfall intensity is projected to increase (see Table 11, section 5.4). The section 32 report identifies that the projected increased in the intensity of rainstorms may require additional short-term detention capacity to avoid public health issues, environmental damage and property damage from flooding. The updated provisions (MRZ-S6) require a stormwater attenuation tank which is sized to contain a minimum of 18 litres of water for every 1m² of new impervious area, which is considered sufficient to achieve hydraulic neutrality. We do not currently understand how this figure been arrived at, and what climate change projection has informed this calculation. If rainwater tanks are already full, what alternative short-term detention capacity will be available, and what are the risks associated with this scenario?

¹⁷ Ira, S & Simcock, R. *Understanding Costs and Maintenance of WSUD in New Zealand. Activating WSUD for Healthy Resilient Communities*. July 2019, pg 23. Accessed at: <https://www.landcareresearch.co.nz/assets/Discover-Our-Research/Environment/Cities-settlements-communities/understanding-costs-and-maintenance-of-wsud-in-nz.pdf>

5.3.1. Liquefaction

We are also concerned that the Council is relying on mapping of liquefaction risk that is out-dated and high level in nature. Liquefaction prone soils are likely to be associated with low-lying and flood-prone areas. The same areas where our Māori communities are living in older and lower quality housing stock which may not be constructed on appropriate foundations.

Liquefaction mitigation will be expensive, especially where this is addressed on an individual site by site basis, and this will have a subsequent flow on effect on affordability of housing constructed on such sites. Providing for medium density housing where much of the zone is likely to be affected by liquefaction hazard potentially disadvantages lower socioeconomic groups in the community who may not be able to afford to buy those new houses.

5.4. Green space and vegetation

Vegetation and urban green space is important to the health and wellbeing of our community, and provides multiple ecosystem services.

At present, the plan change provisions do not go far enough to recognise and retain the multiple ecosystem services that vegetation and green space provides in an urban context¹⁸. The provisions are focused on the visual amenity/place making benefits of vegetation and mature trees, and to a lesser extent, on stormwater mitigation. We request that the services that such vegetation and green space provides to: retain fertile soil capacity, recharge groundwater, capture and filter pollutants, assist with mitigating the heat island effect, provide shade/shelter for active transport, enable recreation, regulate air quality, provide habitat and biological corridors for our indigenous species and support physical and mental health also be highlighted through the objectives and policies. These considerations should then inform design.

We appreciate that the Council has limited influence over the retention of vegetation on individual development sites unless it has been specifically protected in the district plan. However the provisions could do more to highlight the multiple benefits of retaining such vegetation, especially in areas which will become more densely developed over time. While Proposed MRZ-P12 seeks the retention and incorporation of vegetation into development and encourages replacement planting to be of “equal or better quality and to use locally sourced species”, it could be strengthened by reference to the reasons why this policy direction is being made. The question also rises as to what constitutes “better quality” and how that might be assessed - is this driven by aesthetics, or by ability to trap and filter contaminants, detain stormwater, provide shade/shelter, etc? We wish to avoid prioritisation of aesthetic values in favour of ecosystem services.

Research by the Parliamentary Commissioner for the Environment found that where New Zealand cities have enabled infill and higher density living, there have been accompanying trends in loss of green space and vegetation cover¹⁹. Rangitāne are concerned that the extent

¹⁸ *Are we building harder, hotter cities? The vital importance of urban green spaces*. Parliamentary Commissioner for the Environment, March 2023. Accessed at: <https://pce.parliament.nz/media/tetah53z/report-are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces.pdf>

¹⁹ *Are we building harder, hotter cities? The vital importance of urban green spaces*. Parliamentary Commissioner for the Environment, March 2023. See Section 2 Urban green space state and trends. Accessed at: <https://pce.parliament.nz/media/tetah53z/report-are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces.pdf>

of vegetation and green space cover in the proposed MRZ zone will follow this trend. We would like to have seen a target set (maintain at a minimum and purposefully increase wherever possible) for vegetation cover levels in accordance with the NPS for Indigenous Biodiversity (with associated Plan effectiveness monitoring to confirm that the provisions are achieving this). Beyond the plan change, the Vegetation Framework is a non-regulatory mechanism that could help achieve this.

The Parliamentary Commissioner's report²⁰ also advocated strongly for the provision of open space reserves that provide for multiple functions – stormwater management, informal green space, passive and active recreation and active transport - as a means to mitigate the cumulative adverse environmental and social effects from more densely built urban spaces. Beyond the plan change itself, the Council's reserves criteria and development contributions policies should be updated to recognise and address this.

5.4.1. Re-zoning of reserves for housing (Huia Street)

Existing reserves in the Medium Density Zone should not be rezoned or disposed of for housing until it is known whether they might be required for stormwater interventions as part of a wider Stormwater Strategy for the city.

Research by the Parliamentary Commissioner for the Environment (the same report referred to above) found that it is much more difficult to retrofit new public green space into existing urban areas than it is to incorporate it new greenfield developments²¹. It is short-term thinking to dispose of these areas when they may be needed in the future to provide public open space to service the MDZ. An analysis should be undertaken on reserves to first understand their potential use for city stormwater management.

5.5. Urban design, public space and built form reflect our associations with wai and whenua

As tangata whenua of this city, we wish to see the design of the built environment, including public and community spaces, reflect and celebrate the stories and identity of Rangitāne. This is beneficial to the wider community as it enables a deeper understanding and connection with Te Papaioea, connecting people with place to look after our city for future generations.

Our cultural norms and traditions can be expressed and acknowledged through:

- street naming,
- using locally sourced indigenous vegetation that would be characteristic of that place,
- design of public spaces that reflects the city's story and collective identity,

²⁰ *ibid*

²¹ *Are we building harder, hotter cities? The vital importance of urban green spaces*. Parliamentary Commissioner for the Environment, March 2023, pg 81. Accessed at: <https://pce.parliament.nz/media/tetah53z/report-are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces.pdf>

- site layout that respects the presence of urban waterways and facilitates public access where practicable, rather than turning its back and treating these as dumping grounds or drains.

While we do not see all of these outcomes necessarily forming regulatory requirements, these opportunities should be identified and promoted through the plan change provisions. We appreciate that opportunities to recognise cultural connections may be more feasible within large-scale redevelopment or public projects, compared with smaller infill developments.

We appreciate and support the proposed amendment to Policy MRZ-P3 to encourage site layouts which actively engage with adjacent urban waterways and to Policy MRZ-12 to reference locally sourced species.

5.6. Active and public transport provision

We strongly support requirements for active transport provision within the MDZ, and which are reflected in the proposed provisions. We want to see whānau staying active to support healthy lifestyles, to achieve our Whānau Ora Framework outcomes. The long-term objective should be to provide a fully connected active transport network, not just along the main commuter routes but via safe connections from housing to nearby community facilities, kura and public green spaces. People will not use active transport networks, especially with children, if they perceive their journeys to be unsafe, so the provisions must be highly directive with respect to safety provision.

We also support development which facilitates improvements to public transport services. We acknowledge that increasing public transport requires a culture shift. It may require incentives and/or opportunities for all of the community to utilise public transport. It must also be affordable and designed for our vulnerable communities and especially our disabled and elderly populations.

5.7. Sites of significance and our connection with wai

Section 17 of the PNCC Plan is currently not fit for purpose for managing effects on Rangitāne associations with te taiao, in particular on the mauri of urban waterways. Only five sites of significance are scheduled in the Operative District Plan, and none of these sites are located within the proposed plan change area. There has not been sufficient time or resourcing for Rangitāne to provide an updated schedule of sites and associated values and how they should be best protected, and potential impacts reduced, mitigated or offset, in accordance with tikanga, to include within the plan change. Rangitāne considers this is a priority and should be addressed through a further plan change as a matter of urgency.

Rangitāne also consider that further policy guidance is needed beyond that which currently exists in the District Plan. This includes policy guidance to give effect to the direction in the NPS-FM 2020 (with respect to managing freshwater in a way that gives effects to Te Mana o te Wai, and which ensures the health and well-being of degraded water bodies and freshwater ecosystem is improved) and in the RPS, in particular Objective RMIA-O1.

Rangitāne request that policy direction is included in Section 10A to address the following:

- development assists to protect and restore the mauri of the Manawatū Awa and its lagoons and tributaries;

- promote opportunities to 'daylight' and re-establish forgotten awa and parts of awa, overland flow paths and wetlands;
- address the adverse effects of residential intensification on the mauri of wai (water), through for example, riparian planting, treatment and storage of stormwater;
- planting indigenous species that would be expected to be present in that place;
- providing setbacks to give rivers and streams room on their floodplains and flow paths to express their natural character; and
- making it easy and safe for people to connect with the natural environment.

In this respect, Rangitāne supports the updated draft provisions, in particular Proposed MRZ-O3 Protecting waterbodies and freshwater ecosystems, Policy MRZ-P8 Water Sensitive Urban Design, MRZ-P9 Building Materials, MRZ-R23 Copper and zinc building materials and MRZ-R24 Stormwater treatment for four or more carparks (subject to some modifications, as discussed further in section 7 below).

Where sites of significance may be impacted, it is important that Rangitāne has an opportunity to influence development at the earliest opportunity (i.e when the first resource consent is sought, whether that is subdivision or a land use consent) so that this can have a meaningful impact on the layout and form of the development. To cover the bases, provision may be needed in both the subdivision (Section 7) and land use development (Section 10A) provisions.

However, until such time as sites of significance are identified and protected through the district plan, Rangitāne recognise there is no easy solution to accommodate this.

Rangitāne consider the risk of adverse effects on cultural values associated with sites which have been previously developed are no lesser than might be the case in a 'greenfield' development plan change. This approach is a matter of tikanga where any activity must be guided by tangata whenua to avoid and mitigate adverse effects wherever they may occur. However, Rangitāne do recognise that smaller developments may be limited in their ability to provide on-site mitigation of effects, and it is likely that many developments within the Medium Density Zone will be three dwellings or less, as developers seek to take advantage of the proposed permitted activity status.

We have identified a number of potential ways to address the gap in provision for sites of significance, as outlined below. Due to the above concerns, Rangitāne prefer Option 1 or 7. It is possible that the most appropriate option is a combination of more than one of these mechanisms.

Table 1: Options to address cultural effects on sites of significance to Rangitāne

The following options are potential ways to take into account potential effects of development on sites of significance to Rangitāne. These options would all require additional policy direction as described above. The options are not necessarily mutually exclusive. The most optimum alternative may be a combination of more than one of these options.

Option no.	Description of Option	Costs	Benefits	Efficiency and effectiveness	Risks of acting/not acting
1	Amend the rules so that development of more than 1 additional dwelling on a site is a controlled or Restricted Discretionary (RD) activity until a city-wide sites of significance study and associated plan change has been completed. If the study and plan change has been completed and the site isn't in an identified site of significance, then development of up to 3 dwellings would be a permitted activity. Cultural effects would need to be a matter of control or discretion within the rule.	<p>There will be consenting costs for more people undertaking development in the MDZ, until such time as a plan change to incorporate additional sites of significance has been completed.</p> <p>There will be time and costs associated with Rangitāne providing comment on applications.</p>	This option would capture all development that would potentially have an adverse effect on cultural values and sites of significance.	This option will generate a large number of resource consent applications until such time as the sites of significance plan change is operative, which would be in-efficient, given the likelihood that many of those applications would be unlikely to have significant adverse effects on cultural values.	<p>Only 5 sites of significance to Rangitāne are currently scheduled in the Operative District Plan. All of these sites are located outside the proposed Medium Density Zone. Information on the locations and values of other sites of significance is held by Rangitāne, but these sites and their values are not currently protected through the District Plan.</p> <p>Rangitāne have not had sufficient time or resourcing to document</p>

Option no.	Description of Option	Costs	Benefits	Efficiency and effectiveness	Risks of acting/not acting
2	<p>Include 'cultural effects' as a matter of discretion within the subdivision rule and the RD land use rule for development of more than 3 residential units.</p> <p>This provides for cultural effects on sites of significance to be considered and for Rangitāne to be consulted (by the applicant) to determine what measures might be required to address effects.</p>	<p>There will be costs for applicants of engaging with Rangitāne, either through proactive engagement prior to lodgement of an application, or potentially associated with limited notification consent application fees.</p> <p>There will be resource implications for Rangitāne in reviewing and commenting on applications, and cost-recovery must be possible.</p>	<p>Provides an opportunity for the design and layout of medium to large scale developments to be modified to mitigate adverse effects on sites of significance to Rangitāne and associated cultural values and associations, and even to promote positive effects.</p> <p>The opportunity will be more limited where it occurs through limited notification, or the applicant makes contact with RoM at a late stage in the development process.</p>	<p>If potential applicants engage Rangitāne early in the development phase, this process should be efficient and effective.</p>	<p>the locations and values of additional sites in a way that they can be properly incorporated (in accordance with tikanga) into the District Plan through PCI. However they have a clear intent to undertake this process at a later date. Without a schedule of sites in the District plan and associated provisions to protect these sites from inappropriate development, there is a risk that these sites may be degraded or destroyed through development in the proposed Medium Density Zone.</p>
3	<p>Include 'cultural effects' as a matter of discretion within the subdivision provisions and the RD land use</p>	<p>There will be costs for applicants of engaging with RoM, either through proactive engagement prior to lodgement of an application, or</p>	<p>As above</p>	<p>Limited notification will extend the time taken for applications to be processed and determined.</p>	

Option no.	Description of Option	Costs	Benefits	Efficiency and effectiveness	Risks of acting/not acting
	<p>rule for more than 3 residential units.</p> <p>Include a requirement for limited notification of all resource consent applications for development of more than 3 residential units within the Medium Density Zone, unless written approval has already been provided by Rangitāne.</p>	<p>associated with limited notification consent application fees.</p> <p>There will be costs for RoM in reviewing and commenting on applications which must be recoverable .</p>		<p>The limited notification clause could potentially be amended as part of a future plan change when a future plan change incorporates sites of significance and associated provisions into the plan.</p>	
4	<p>Include 'cultural effects' as a matter of discretion within the subdivision provisions and the RD land use rule for more than 3 residential units.</p> <p>Require all applications of more than 3 dwellings within the Medium Density Zone to provide a CIA, as a</p>	<p>There will be costs for applicants of engaging with Rangitāne, and of commissioning a CIA, if one is required.</p> <p>There will be resource implications for Rangitāne in reviewing and commenting on applications, or preparing CIAs and cost-recovery must be possible.</p>	<p>Provides an opportunity for the design and layout of the development to be modified to avoid, remedy or mitigate adverse effects on sites of significance to Rangitāne, and even to promote positive effects.</p>	<p>A CIA may not always be required. If potential applicants engage Rangitāne early in the development phase, this process can be efficient and effective.</p> <p>Provides an opportunity to influence design and site layout early in the process.</p>	

Option no.	Description of Option	Costs	Benefits	Efficiency and effectiveness	Risks of acting/not acting
	<p>performance standard on the rule. The CIA must identify and assess potential effects of the development on sites of significance to Rangitāne, and describe how those effects have been avoided or mitigated. Alternatively, the application may provide written advice from Rangitāne that a CIA is not considered necessary.</p>				
5	<p>Identify geographical 'areas of interest' within the Medium Density Zone on the planning maps, which encompass the locations of sites of significance.</p> <p>Within these 'areas of interest' use one of the</p>	<p>There will be costs for applicants of engaging with Rangitāne, and of commissioning a CIA, if one is required.</p> <p>There will be resource implications for Rangitāne in reviewing and commenting on applications, or preparing</p>	As above	<p>Depending on the geographical extent of the areas of interest, this option may narrow down the areas to which the requirements are applied, and therefore be more efficient relative to options 1-4.</p>	<p>This option relies on Rangitāne having sufficient time and resource to identify the appropriate areas of interest so that they can be incorporated into the plan change.</p>

Option no.	Description of Option	Costs	Benefits	Efficiency and effectiveness	Risks of acting/not acting
	mechanisms outlined above (i.e. require consideration of effects, limited notification, preparation of a CIA) within the rules.	CIAs, and cost-recovery must be possible.			
6	<p>Provide sufficient resource and time for Rangitāne to identify sites of significance and associated values that require protection, along with provisions to provide for these values to be protected.</p> <p>Notify this schedule and provisions as a future plan change.</p>	<p>There will be administrative and resourcing costs to the Council of notifying a plan change.</p> <p>Rangitāne will require resourcing from the Council to assist them to prepare the plan change.</p>	Once incorporated into the plan, the sites and values will direct resource consent applications and decision making through the plan.	<p>Once incorporated into the plan, this option would likely be more efficient for developers, council consents planners and Rangitāne.</p> <p>The effectiveness of this option in protecting cultural values would rely on the comprehensiveness of the schedule and the associated provisions.</p> <p>This option would need to be accompanied by amendments to existing rules in Section 17 or additional rules, as the discretionary activity rule in Section 17 is insufficient</p>	This option relies on a future plan change, and would not provide any protection for unscheduled sites in the interim, unless combined with one of the other options above.

Option no.	Description of Option	Costs	Benefits	Efficiency and effectiveness	Risks of acting/not acting
				to manage the potential effects.	
7	<p>Provide sufficient resource and time for Rangitāne to identify sites of significance and associated values that require protection, along with provisions to provide for these values to be protected.</p> <p>Enable this work to be completed prior to the PCI hearing.</p>	Rangitāne will require resourcing from the Council to assist them to prepare this information.	Once incorporated into the plan, the sites and values will direct resource consent applications and decision making through the plan.	<p>Once incorporated into the plan, this option would likely be more efficient for developers, council consents planners and Rangitāne.</p> <p>The effectiveness of this option in protecting cultural values would rely on the comprehensiveness of the schedule and the associated provisions.</p> <p>This option would need to be accompanied by amendments to existing rules in Section 17 or additional rules, as the discretionary activity rule in Section 17 is insufficient to manage the potential effects.</p>	This option relies on Rangitāne having sufficient time and resource to identify the appropriate areas of interest so that they can be incorporated into the plan change.

6. Feedback from the first review of the draft provisions (6 September version)

A draft of the proposed amendments to Sections 7, 4, 10 and the new section 10A were provided to us for comment in early September. In response we gave detailed comments and tracked changes on the provisions and made a number of additional comments, which are set out below.

These comments are included here to show the evolution of the provisions, including in response to our feedback. For our latest position on the updated provisions, please refer to section 7 of this document.

Introduction to Section 10A

The introductory paragraphs describe residential amenity from a predominantly pākehā worldview. Rangitāne would like to see this broadened to encompass the whanau ora conceptualisation of what makes a healthy residential environment.

The introductory text to the proposed Section 10A states that the intention of the zone is to support greater diversity of housing choice, but this section makes no mention of Māori aspirations for housing, such as papakāinga. Please include a reference to enabling papakāinga in the introductory section, to enable Māori to provide for their cultural wellbeing.

Integration of infrastructure and land use (Proposed Objective MRZ-O4)

The draft provisions appear predominantly focused on 'development infrastructure' as defined in the NPS-UD. 'Additional infrastructure' as defined in the NPS-UD should also be integrated with land use, particularly public open space/green space and social infrastructure (schools, kura, healthcare). This is important to achieving connected and healthy urban environments. Rangitāne is concerned about the potential for inadequate provision of accessible green space within the MDZ to serve the additional people living there, especially as private open space will be reduced through intensification. As the Parliamentary Commissioner's research²² found, it is very difficult to address this retrospectively.

Effects of flooding (Proposed Objective RMZ-O8, Policy MRZ-P7)

The objective should seek to avoid or mitigate adverse effects of flooding. It is important that risk to *people, property, infrastructure and the environment* is reduced to an acceptable level. Rangitāne are concerned that on-site measures will be inadequate to address risk over the longer term.

Stormwater attenuation tanks do not currently assist to reduce water consumption and are a missed opportunity to increase water resilience.

Managing offsite stormwater (Proposed Objective MRZ-O9, Policy MRZ-P7, MRZ-P8)

²² *Are we building harder, hotter cities? The vital importance of urban green spaces*. Parliamentary Commissioner for the Environment, March 2023. Accessed at: <https://pce.parliament.nz/media/tetah53z/report-are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces.pdf>

Rangitāne do not support these provisions as currently worded. As identified in the draft technical stormwater report:

“The modelling indicates that some areas are already prone to significant flooding and that the supporting infrastructure is not adequately sized for the current level of development.”

Requiring ‘hydraulic neutrality’ will therefore be inadequate to future proof our urban environments. The areas at greatest risk are concentrated on the western side of the city where our Māori/Pacific communities live. Rangitāne requests that current levels of risk, as identified in the technical stormwater report, are reduced. Additional capacity should be built into the system, to achieve climate change resilience.

Nature-based solutions should be adopted in preference over hard engineering solutions, and this should be signalled in the policies. Wastewater overflows are culturally offensive and should not occur from a new development. Additional connections to the network should not be approved if there is a risk this will occur.

Several of the rules to implement these provisions are in-complete and it is unclear what the activity status will default to if compliance is not achieved. Rangitāne request an opportunity to review and comment on these rules, once fully drafted.

Rangitāne request that the rules direct what matters should be addressed in the site-specific hydrology assessments. In addition, there should be a requirement that those assessments demonstrate how any on-site mitigation will support and align with any catchment or sub-catchment plans that have been developed to implement the city-wide Stormwater Strategy. While that requirement will not be triggered until such time as those city and catchment level documents have been prepared, it should be included now so that a coordinated approach to development and infrastructure provision can be achieved over time.

Resilient and energy efficient development (Proposed Objective MRZ-O9, Policy MRZ-P11)

As currently worded, the provisions are non-aspirational and do not go far enough to give effect to recently adopted regional direction in the RPS, or the NZ Emission Reductions Plan.

‘Sustainable’ development is a vague and broad concept and not readily measured. Rangitāne consider this objective and policy should be broadened to specifically reference development that supports reductions in greenhouse gas emissions, to give effect to RPS policy UFD-O5 and the NZ Emission Reductions Plan.

Proposed Policy P11 should encourage urban design, building form and site layouts which minimise as far as practicable the contribution to climate change of the development and its future use, including through energy efficiency (including whole of life energy efficiency), water efficiency, waste minimisation, use of public and active transport, consistent with policy UFD-P8 in the RPS.

Proposed Objective MRZ-O11 Māori to express cultural traditions and connections

Rangitāne request an objective is included in Section 10A that gives effect to and addresses the matters in RPS RMIA-O1. We note the placeholder for this in the draft provisions. The objectives and policies in Section 3 of the Operative District Plan do not sufficiently capture and address our

connections and relationships with te taiao, and wai and whenua in particular. Our aspiration is to enable our people to be able to safely and readily interact with the natural environment, within urban areas.

Proposed Policies P3 and P13 - 'attractive streets'

'Attractive' is a subjective and imprecise term open to interpretation. Rangitāne is concerned that residential streets are safe, legible in a way that assists with way finding, encourage/promote mode shift to active transport, and make provision for street trees to provide shade/shelter. The policies should address these matters.

Proposed Policy MRZP12 Vegetation and landscaping

The draft policy includes terms which are imprecise and uncertain, including 'visually prominent' and 'equal or better quality'. Rangitāne consider trees are important not just for visual amenity, but for the multiple benefits they provide for shade, shelter, cooling, air quality, habitat, mental health etc. Rangitāne's preference is that replacement planting ideally uses indigenous species that would be expected to have been in that place, and that new planting is chosen on the basis of its ability to assist with reducing soil erosion, maintaining soil fertility, providing habitat/corridors for native species and contribution to increasing indigenous vegetation cover in the city. The policy doesn't sufficiently recognise or seek to retain the multiple ecoservices of vegetation in an urban context.

Papakāinga and marae developments (Proposed Objective MRZ-O1, Policy MRZ-P1)

Rangitāne support inclusion of papakāinga in proposed Objective MRZ-O1 and request that a reference is also made in proposed policy MRZ-P1.

Rangitāne support Objective MRZ-O2 as this aligns with a whānau ora approach.

A change is proposed to remove papakāinga from the discretionary activity rule (R10.7.4.8) in Section 10. It is not clear what activity status a papakāinga will have in the Residential Zone as a result. It does not appear to have been inserted into any of the other rules within this Section.

Rangitāne consider a marae development should be a controlled activity in the MDZ. While there are potential effects associated with such a development, they would not be out of context with this environment, which will be busier and noisier than the general Residential Zone. Provision of parking and effects of traffic movements on the network can be managed through conditions and these effects would be less due to the improved accessibility and ability to access the site by public or active transport.

Marae also double as civil defence and emergency accommodation facilities if designed well such facilities will be important for medium density areas when affected by natural hazard events.

7. Feedback from review of the updated provisions (11 October version)

An updated draft of the new section 10A were provided to us for comment in October 2024 and include a number of changes in response to the matters raised in section 6 of this document. We have provided tracked changes and comments on this section, which are appended to this document. In addition, we make the following comments on the updated draft.

Introduction

We understand that this will be updated to encompass the Te Ao Māori word view and concepts of whānau ora. We request that wording to the following effect is inserted:

The Medium Density Zone supports the physical and spiritual health of our Māori whānau, enabling them to practice their culture and provide for their tikanga. This includes providing safe access to the landscapes and urban waterways valued by their tīpuna, enabling the development of papakāinga and recognising and celebrating our cultural connections with te taiao and Rangitāne whakapapa through urban design.

MRZ-O1 Purpose of the Medium Density Residential Zone, MRZ-P1 Enabled activities and MRZ-P2, MRZ-P2 Residential activities and buildings, including papakāinga, which do not meet the permitted activity standards

Rangitāne supports the inclusion of papakāinga in this objective and policies.

MRZ-O2 Planned built form of the Medium Density Residential Zone

Rangitāne supports the inclusion of references to connections to open space and the natural environment, resilience to climate change, energy efficiency, adaptability and safety.

MRZ-O3 Protecting water bodies and freshwater ecosystems,

Rangitāne strongly support this objective and seeks that it is retained.

MRZ-O4 Mitigating effects of flooding in the Medium Density Residential Zone, MRZ-P6 Adverse effects of flooding and stormwater

Rangitāne strongly support this objective and policy and seek that they are retained, especially that there is “no increase” in risk exposure from flooding. As previously mentioned, Rangitāne consider hydraulic neutrality will be inadequate to future proof our urban environments and would like to see additional capacity built into the system, to achieve climate change resilience. In this respect, we consider maintaining peak flows and volumes at ‘pre-development levels’ does not go far enough.

MRZ-O6 Whenua Māori

Rangitāne strongly support this objective and seeks that it is retained.

EPZ-P3 Planned built form

Rangitāne supports the reference to site layouts which actively engage with adjacent urban waterways as this will assist to improve access to urban waterways, and that developments provide landscaped areas. Provision of vegetation is vital for retaining ecosystem services and stormwater management.

RZ-P4 Transport

Rangitāne support the reference to on-site bicycle parking and storage to support mode shift.

MRZ-P6 Adverse effects of flooding and stormwater

As outlined above, Rangitāne support this policy, but request that it goes further in terms of seeking an outcome that would achieve more than 'hydraulic neutrality' – i.e. a level of built-in additional resilience to climate change. We have requested a small edit to the policy to reflect this.

MRZ-P7 – Development in the Stormwater Overlay

Rangitāne requests edits to ensure the hierarchy of avoid, remedy, mitigate is employed in this policy, and that effects on infrastructure (which would include stormwater infrastructure) are also considered. We note the last sentence of this policy is currently incomplete.

MRZ-P9 Building materials

Rangitāne requests a minor change to this policy to seek prevention of use of these materials first, before mitigation via treatment is employed.

MRZ- P12 Vegetation and landscaping

Rangitāne support the intent of this policy, but question how quality is to be measured and assessed through applying this policy? Quality should be measured in terms of achieving stormwater management and ecosystem services. So for example, a mixture of indigenous shrubs and trees would be more likely to detain stormwater and provide a range of ecosystem services than grass. The policy should be explicit about this.

Matters of discretion and structure of the rules

Rangitāne are concerned that the structure of the rules as currently drafted is unnecessarily complex and potentially uncertain, in the way that matters of discretion are applied to individual performance standards, as well as to the parent rules – with the potential for both duplication and/or differences in interpretation/application. We consider this could be simplified by removing one or other of these 'layers' of discretion.

Performance standards are never a perfect fit for implementing policy direction, and overemphasis on compliance with individual standards could potentially lead to perverse outcomes. It also doesn't recognise that a number of the standards work in concert – particularly in relation to stormwater management. We consider the current structure might set up a somewhat disjointed or silo approach, which does not recognise that while one standard may not be complied with, the 'effect' that the standard is seeking to address might be adequately addressed through compliance, or even 'over-compliance', for want of a better word, with other performance standards.

We are also concerned that the references to particular discrete policies in the matters of discretion, leads to an approach which does not enable a particular development to be considered in the round,

and for other applicable objectives and policies, including in other chapters of the plan, to be considered in the decision making process. This includes policies which the application may be strongly aligned with, and which may even generate positive effects. We suggest that an approach which frames relevant matters of discretion according to the ‘matter’ encompassed in the policy, might be a more flexible approach that enables the relevant matters to be considered more holistically, for any particular application. For example, the matter of discretion could be “management of stormwater quality and quantity”, rather than just a reference to particular policies. This approach is adopted in other operative provisions in the district plan.

If the alternative we propose is not preferred, Rangitāne would like to see a more comprehensive list of policies referenced in the matters of discretion, particularly those policies which are more promotional and enabling, rather than prescriptive in nature.

Rule MRZ-R16 Marae

On reflection, Rangitāne consider the restricted discretionary status may be appropriate for any marae, provided that, if an application from another iwi or hapū did come forward, Rangitāne o Manawatū would be given an opportunity to provide feedback on any potential cultural effects on Rangitāne o Manawatū, as the recognised tangata whenua of Palmerston North, of such an application. We have suggested revised wording to reflect this.

Rule MRZ-R23 Copper and zinc building materials – all residential and non-residential activities

Rangitāne consider this rule might be more appropriately structured either as an RD rule or as standard on all other relevant rules. As currently structured, it appears to authorise all buildings with copper or zinc cladding or roofing materials, without referencing that the more general rules to authorise buildings will also apply. Also, should this rule specify a percentage threshold of copper and zinc within the building materials, to be more certain and precise?

Rule MRZ-R24 Stormwater treatment for four or more carparks (including garages)

Rangitāne consider this rule might be more appropriately structured as a standard. The specific reference to carparks could lead to perverse outcomes and uncertainty (does it include a driveway for example?), and we consider the rule would be more effective if it just referred to areas for parking, access and manoeuvring requiring runoff to be captured and treated, with the matters of discretion (if this structure is retained) capturing those matters currently listed in the rule.

Disclaimer

We have used various sources of information to write this report. Where possible, we tried to make sure that all third-party information was accurate. However, it's not possible to audit all external reports, websites, people, or organisations. If the information we used turns out to be wrong, we can't accept any responsibility or liability for that. If we find there was information available when we wrote our report that would have altered its conclusions, we may update our report. However, we are not required to do so.

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