

Submission 1 – Viviene Bold



SUBMISSION FORM: Proposed Plan Change & Taraika **Growth Area**

Horowhenua District Plan (2015) Resource Management Act 1991

Form 5 of Resource Management (Forms, Fees, Procedure) Regulations 2003 Submissions can be: Delivered to: Horowhenua District Council Offices, 126 Oxford Street Levingorowhenua Posted to: Strategic Planning, Horowhenua District Council, Private Bao 4002, Levin Faxed to: (06) 366 0983 Emailed to: districtplan@horowhenua.govt.nz Submissions must be received no later than 5pm on 1 February 2021. Note: You must fill in all sections of this form.

	/3.1
1. Submitter Contact Details	
Full Name: Autenne	Horowhenus District Council
2. Trade Competition	
I could gain an advantage in trade competition through this submission. I am directly affected by an effect of the subject matter that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition, your right to make a submission may be limited by Clause 6 of Resource Management Act 1991.	tition: Yes □ No □

3. The specific provisions of the Plan Change that my submission relates to are as follows: (Please specify the Rule or Map reference your submission relates to)	
Envenent	
(Continue on a separate sheet if necessary)	



4. My submission is that: (Clearly state whether you SUPPORT parts of the Proposed Plan Change, giving reasons for your views)	or OPPOS	E specific
Option		
(Continue on a sepa	rate sheet i	f necessary)
5. I/We seek the following decision from the Horowhenua (Give details of what amendments you wish to see and your reasons		ouncil:
	.,,	
(Continue on a sepa	rate sheet i	f necessary)
6. Proposed Plan Change Hearing		
Do you wish to speak in support of your submission at the hearing?	Yes □	No □
If others make a similar submission would you be prepared to consider case at the hearing? Yes \Box No \Box	ler presenti	ng a joint
Would you like to make your verbal submission in Te Reo Māori?	Yes □	No □
Sign language interpretation required?	Yes □	No 🗆
I have attached additional pages to this submission.		
Signature of Submitter: ULBeld Da (Or person authorised to sign on behalf of submitter)	ıte:	

Privacy Act 1993
Please note that submissions are public information. Information on this form including your name and submission will be accessible to the media and public as part of the decision making process. Council is required to have this by the Resource Management Act 1991. Your contact details will only be used for the purpose of the Plan Change process. The information will be held by the Horowhenua District Council, 126 Oxford Street, Levin. You have the right to access the information and request its correction.



Submission 2 - Charlotte Yates



Submission Form: Proposed Plan Change 5: Waitārere Beach Growth Area



Submission date: 11 April 2021, 5:59PM

Receipt number: 4
Related form version: 1

1. Submitter Contact Details

Title:	Ms
Full Name:	Charlotte Yates
Name of Organisation:	
Address for Service:	117 Rua Avenue Waitarere Beach
Postcode:	5510
Telephone:	021685561
Mobile:	
Email:	crbyates@actrix.co.nz

2. Trade Competition

I could gain an advantage in trade competition through **No** this submission:

I am directly affected by an effect of the subject matter **No** that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition:

3. Specific provisions

The specific provisions of the Plan Change that my submission relates to are as follows:

Change 5: Waitarere Beach Growth Area

4. My submission

My submission is that:

I oppose the development of destination commercial opportunities. Housing increases need to minimize changes to the environmental and beach culture. It shouldn't create just another suburb.

Submission Attachments:

5. Decision sought

I/We seek the following decision from the Horowhenua

District Council:

Further community consultation required for ascertaining longterm environmental impact and any changes to the beach culture that has developed here.

6. Proposed Plan Change Hearing

Do you wish to speak in support of your submission at the hearing?

No

If others make a similar submission would you be prepared to consider presenting a joint case at the hearing? Yes

Declaration	
Signature of Submitter:	Name of signatory: Charlotte Yates
	Link to signature
Date:	11/04/2021
Office Use Only	
Date Received:	
CM9 Number:	
Submission No:	

No

Would you like to make your verbal submission in Te

Sign language interpretation required?

Reo Māori?



Submission 3 – Emma Robinson



Submission Form: Proposed Plan Change 5: Waitārere Beach Growth Area



Submission date: 11 April 2021, 6:01PM

Receipt number: 5
Related form version: 1

1. Submitter Contact Details

Title:	Ms
Full Name:	Emma Jane Robinson
Name of Organisation:	
Address for Service:	117 Rua Ave, Waitarere Beach, Levin
Postcode:	5510
Telephone:	021 117 6145
Mobile:	021 117 6145
Email:	robinson.emmaj@gmail.com

2. Trade Competition

I could gain an advantage in trade competition through **No** this submission:

I am directly affected by an effect of the subject matter **No** that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition:

3. Specific provisions

The specific provisions of the Plan Change that my submission relates to are as follows:

Plan Change 5, Waitarere Beach Growth Area

4. My submission

My submission is that:

I oppose the implementation of development of "destination commercial opportunities". The village functions very well with the existing shops and retail options. Adding "destination" shopping simply crowds out the becah settlement and does not enhance our community.

Secondly, any housing devlopment needs to be viewed very carefully to minimise the impact on the natural environment. There are many bird species that rely on the existing farmland for nesting and we need to get a full understanding on how housing and therefore more traffic, pollution etc will impact wildlife.

I acknowledge there is a need for some further residential development but it must be diverse and not negatively impact the culture of the beach. People living at Waitarere have chosen to do so because it is a peaceful village and do not wish to have "big box" stores built in the surrounding area.

Thorough consultation with environmental and cultural groups is required.

Submission Attachments:

5. Decision sought

I/We seek the following decision from the Horowhenua District Council:

No commercial development in the beach region.

Minimal housing development. Further consultation regrading rezoning and the implications environmentally and culturally.

6. Proposed Plan Change Hearing

Sign language interpretation required?

Do you wish to speak in support of your submission at the hearing?

If others make a similar submission would you be prepared to consider presenting a joint case at the hearing?

Would you like to make your verbal submission in Te Reo Māori?

No

Declaration

Name of signatory: Emma Robinson
Endi
Link to signature
11/04/2021



Submission 4 – Sharon Freebairn

Submission Form: Proposed Plan Change 5: Waitārere Beach Growth Area



Submission date: 12 April 2021, 2:05PM

Receipt number: 6
Related form version: 1

1. Submitter Contact Details

Title:	Mrs
Full Name:	Sharon Freebairn
Name of Organisation:	
Address for Service:	127 Park Ave, Waitarere Beach
Postcode:	5510
Telephone:	+10274904491
Mobile:	
Email:	sharonf@inspire.net.nz

2. Trade Competition

I could gain an advantage in trade competition through **No** this submission:

I am directly affected by an effect of the subject matter No that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition:

3. Specific provisions

The specific provisions of the Plan Change that my submission relates to are as follows:

Refer to attached document

4. My submission

My submission is that:	Refer attached document
Submission Attachments:	Submission to HDC Proposed Plan CHange 5 -
	Waitarere Beach Growth Area.docx

5. Decision sought

I/We seek the following decision from the Horowhenua
Refer attached document District Council:

6. Proposed Plan Change Hearing

Do you wish to speak in support of your submission at the hearing?	No
If others make a similar submission would you be prepared to consider presenting a joint case at the hearing?	No
Would you like to make your verbal submission in Te Reo Māori?	No
Sign language interpretation required?	No

Declaration

Signature of Submitter:	Name of signatory: S Freebairn
	Link to signature
Date:	12/04/2021
Office Use Only	
Date Received:	
CM9 Number:	
Submission No:	

Submission to: Proposed Plan Change 5: Waitarere Beach Growth Area.

I would like to commend Council on the adoption of the Waitarere Beach Master Plan – a result of forward planning and consultation with all interested parties which provided for a cohesive plan for the future which blended the existing township with the proposed growth area.

There are a few areas of concern which I would like to address:

- 1. 7.4.4 Forest Road Integrated Residential Development Area 40 Forest Road while not indicated in the Master Plan this is now appearing as an option in the District Plan Change. With very small section allocations (250m2) within an area of 2000m2 or greater there are significant implications in regard to fresh water supply at levels to support the higher density housing and also the stress that it would put on wastewater and stormwater management. Whilst it mentions that this development would possibly have healthcare facilities there is an expectation for all residents at the beach to have access to healthcare at the beach NOT just those within this residential facility!
- 2. Why would there be a NON NOTIFICATION clause in the proposal? should not the community have the opportunity to be notified of more specific activity planned in this area we do not necessarily want to be known as the **Coastal Retirement Centre** of Horowhenua!
- 3. 6.3.50A/B: this limits the commercial activity designed for the growth area whilst previously there has been both a garage and petrol pumps at the beach previously, I note that these have been included in the list of activities not permitted. I have concerns about the duplication of some commercial activities already at the beach and the fact that there would then be a separation of the mingling of newer residents from the growth area with those of the existing township this was a perceived problem when the Waitarere Rise Development started the "Them and US" which has taken many years to overcome and feel as though all are equal residents of the township.
- 4. Stormwater Management: with an already high water table prevalent in the growth area, will management of stormwater on each individual property be feasible with a decrease in lot sizes especially within the Greater Density Area? Of particular concern is any runoff into the Wairarawa Stream from the growth area and the effect this would have on existing services within the township. I note that there is no provision for any stormwater upgrades in the 2021-2041 LTP at Waitarere Beach yes we had the stormwater outlets extended in the past four years but at the northern end of the beach the sand dunes are already encroaching on the outlets and with the accretion of sand on both the dunes and the beach surface itself raising there is going to be a crisis point at some time in the not so very far future where the stormwater wont be able to flush onto the beach and back up within the township.
- 5. Wastewater: I note that in the 2021-2041 LTP there is provision for an upgrade to the present wastewater treatment plant within the next 10 years and that the Proposed Plan Change 5 already addresses the way in which wastewater will travel to the plant relieving the existing network.
- 6. Fire Fighting Water Supply: With a greater density of housing there is going to be added stress should there be a house fire within the township without a reticulated water supply to call upon what provision has been made in the Proposed Change Plan for suitable water storage facilities in the growth area?

- 7. Reticulated Water Supply: it has already been announced that any reticulated water supply for Waitarere Beach will now take a back seat to finding additional water for Levin and the growth area within Tara-lka development. While many may see this as appropriate, with climate change forecasts there is a likelihood of less rain fall with every passing year and the ability to fill rain water tanks will become more difficult each year as well. Should not there be more emphasis placed on the 2nd fastest growing area in the Horowhenua?
- 8. Waitarere Beach Road/State Highway 1 intersection: while talks are ongoing with Waka Kotahi NZTA re this intersection I don't think it can be under esitimated how crucial the ability to enter and exit the beach at this intersection is already with the opening of the new Manawatu River and Whirokino Trestle bridges there has been a significant increase in traffic along State Highway 1 and that is before the O2NL expressway is completed add to that traffic movements from 700 additional houses and the intersection becomes a HIGH HIGH accident risk!

In conclusion, I would like to again commend Council on the completed Master Plan and hope that in the next three years we will not have another revised figure of expected growth as we had from 2018 (400) to 2021 (700).

As noted in our Community Plan, our Vision is: **Waitarere Beach is a safe**, **friendly** settlement that has a relaxed beach character and lifestyle with a diverse population who know each other.

Priorities: Recognise the character and the sense of community that makes Waitarere Beach special. The beach, dunes and waterways, outdoor recreation, infrastructure that meets community needs.

Regards Sharon Freebairn Resident Waitarere Beach.



Submission 5 - Chris and Karen Lane

Submission regarding the proposed plan change 5: Waitarere Beach Growth Area

Submitted by Chris (Paul) & Karen Lane - 40 Forest Road Waitarere Beach

25/4/21

1) Contrary to the description on page 74 of the proposal, **we** are the owners and residents of 40 Forest Road.

We **do not** have an interest in the "integrated residential development" desribed in the plan and have not been approached regarding, or involved in the development of this proposal as suggested.

We moved here from a high population density region to enjoy the relaxed and unique atmosphere at Waitarere, and therefore we are opposed to this development that would see our personal and financial investment, and current lifestyle, permanently changed.

2) Community - There are approximately 600 permanent residents living at Waitarere Beach.

It is a quiet beachside community that swells with holidaymakers during the summer months. The population is friendly and mutually supportive and the crime rate is low. In addition to current building developments in the area, the addition of 700 extra households would permanently and irrevocably change the nature of this community to it's detriment.

The development of small area sections is likely to attract a population of lower socio-economic individuals who inherently have increased transport requirements, increased need for social support and bring with them the social problems associated with higher density housing.

3) Services - The Levin/Waitarere Beach/Foxton communities share services that are under great demand, are limited, and are likely to be overwhelmed with the proposed new developments such as this.

These services include but are not limited to schooling and healthcare.

Primary health care access is a limiting factor to population growth within the Waitarere Beach and the surrounding area.

Currently, all General Practices have closed books in the area, meaning that any new households will have to gain a GP in Palmerston North as there are none closer.

Many people do not have the transport or financial capability to travel this far. It is almost impossible to recruit GP's to come to the area despite continued attempts over many years, advertising nationally and internationally.

The area is recognised as being very demanding due to the aged and complex nature of the patient workload.

In addition, the GP's are of an age where 50% are due to retire in the next 10 years. Replacement strategies have not been and are not in place to supply GP's that it takes 12 years to train.

I (Chris) am a GP at Te Waiora Health Services in Foxton.

We have 6,600 registered patients, and the recommended maximum number of patients is 1: 800 per GP.

We will have 1.5 full-time equivalent GP's as at the end of this week.

The proposal that an extra 700 households be created at Waitarere Beach would not be able to be supported by current or projected primary health care services. Additionally, the creation of a retirement complex, that is highly dependent on immediate and continued access to GP care would not be able to be sustained.

Education; the local school is Porotawhao with a roll that fluctuates between 115-130 students.

Rolls are already full in alternate schools that are some considerable distance away.

Attracting quality teachers to this area can be a challenge.

Low-income sections creating affordable homes, will require households to have their own transport or the development of public transport services to support this population.

Water: seeing that the Council plans to privatise water supply in the near future we are concerned at how it envisages supplying water to 700 extra households under this proposal.

We have significant concerns regarding this proposal both personally and on behalf of the large number of potential new residents.

We believe it is unethical to plan for such a major detrimental change to the nature of this community, particularly when local support services are already under extreme strain and new households would have to attempt access to services a considerable distance away for basic social needs and support.

Yours sincerely

Karen and Dr Chris Lane



Submission 6 – Waitārere Beach Progressive & Ratepayers Association

Submission Form: Proposed Plan Change 5: Waitārere Beach Growth Area





Submission date: 26 April 2021, 4:12PM

Receipt number: 7
Related form version: 1

1. Submitter Contact Details

Title:	Mr
Full Name:	Bruce Eccles
Name of Organisation:	Waitarere Beach Progressive and Ratepayers Association (WBPRA)
Address for Service:	44 Kahukura Avenue Waitarere Beach
Postcode:	5510
Telephone:	+64274495915
Mobile:	+64274495915
Email:	brucee51@outlook.com

2. Trade Competition

I could gain an advantage in trade competition through **No** this submission:

I am directly affected by an effect of the subject matter No that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition:

3. Specific provisions

The specific provisions of the Plan Change that my submission relates to are as follows:

Policy 3/4 Infrastructure

4. My submission

My submission is that: See attached documentation (Submission to PPC5)

Submission Attachments: Submission to PPC5.pdf

5. Decision sought

I/We seek the following decision from the Horowhenua See attached document **District Council:**

6. Proposed Plan Change Hearing

Do you wish to speak in support of your submission at Yes the hearing?

If others make a similar submission would you be prepared to consider presenting a joint case at the hearing?

Yes

Would you like to make your verbal submission in Te Reo Māori?

No

Sign language interpretation required?

No

Declaration

Signature of Submitter:	Name of signatory: BJ Eccles
	Link to signature
Date:	26/4/2021
Office Use Only	
Date Received:	
CM9 Number:	
Submission No:	

Submission to Proposed Plan Change 5 (PPC5)

Waitarere Beach Growth Area

We would like to congratulate the Horowhenua District Council (HDC) for the effort and foresight in the presentation of a structured plan for the development of growth at Waitarere Beach and the opportunity given to Waitarere Beach Progressive and Ratepayers Association (WBPRA) to be involved throughout the plan development.

We look forward to continuing to be working with HDC in achieving an orderly and cohesive plan that is suitable and sustainable for the future.

However, we feel that there several concerns that need addressing urgently before we fully support the PPC5 as presented.

National Policy Statements:

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.

Reticulated Water Supply

We feel that the continued reliance upon rainwater collection and/or shallow bore water for an expanded community fails to meet the above objective. With projected climate change the current rainfall of approx 850mm per year could no longer be relied upon and even based on current figures of household usage of water nationally the community of Waitarere Beach is undersupplied.

In order, to support PPC5 it will be necessary for HDC to make reticulated water available as a minimum to the proposed development.

Firefighting

With the proposed expansion of the Village and more dense housing it will be necessary to have available sufficient water for firefighting purposes. Again, the only solution is the provision of reticulated water.

Stormwater

The only proposed infrastructure for stormwater control is for paved streets via the existing stormwater facility which discharges directly into the sea. There have been ongoing issues with the current system with both capacity and operation due to our accreting coastline.

We note all buildings will be required to manage stormwater within their own boundary. Has consideration been given to the effects of downstream existing shallow bore users and/or ingress of stormwater into the Wairarawa Stream?

Wastewater

There is provision in the 2021/2041 LTP for upgrades to the existing wastewater treatment plant and PPC5 provides additional infrastructure for wastewater movement within the community. We see no problems with this planning.

Village Accessibility

There appears to be no planning in relation to accessibility of the expanded community to our centre of commerce (Levin) other than the continued use of State Highway 1. Waka Kotahi NZTA indicate other than the current proposed safety improvements there is no planned improvements/developments to this stretch of highway for the next 20-30 years.

An additional proposed 700 dwellings within the village can only add to an already over stretched piece of roading. Current estimates indicate approximately 9000 traffic movements per day on this existing piece on State Highway 1.

We believe that the above points all indicate weaknesses to the commitment of the stated objective (1).

Whilst WBPRA commend council on the proposed plan change, we have reservations regarding the effectiveness, as outlined above.



Submission 7 - Waitārere Rise Limited



Submission Form: Proposed Plan Change 5: Waitārere Beach Growth Area



Submission date: 27 April 2021, 12:08PM

Receipt number: 8
Related form version: 1

1. Submitter Contact Details

Title:	Not applicable
Full Name:	Waitarere Rise Limited
Name of Organisation:	Waitarere Rise Limited
Address for Service:	c/o Truebridge Associates Limited 522 Queen Street Levin
Postcode:	5510
Telephone:	063686249
Mobile:	0274727191
Email:	roger@truebridge.co.nz

2. Trade Competition

I could gain an advantage in trade competition through **No** this submission:

I am directly affected by an effect of the subject matter **Yes** that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition:

3. Specific provisions

The specific provisions of the Plan Change that my submission relates to are as follows:

Waitarere Rise Limited (WRL) supports Plan Change 5, with amendments as follows:

General submission

WRL owns a block of land at the corner of Waitarere Beach Road and Waitarere Rise Avenue that is proposed to be rezoned by PC5 ("the WRL Land"). PC5 rezones the WRL Land as part Waitarere Beach Mixed Use Area and part Waitarere Beach Greater Density Area.

WRL supports the proposed rezoning of the land, with amendments set out in this submission.

Site coverage - Waitarere Beach Mixed Use Area

For the Waitarere Beach Mixed Use Area site coverage for retail and commercial activities is limited to 15%. The Waitarere Beach Mixed Use Area land on the WRL Land is a strategically located and high profile site setting at the gateway to Waitarere Beach. This site has the potential to 'set the tone' for the beach settlement experience. WRL envisages a central commercial activity (restaurant or café) and possibly a number of kiosks or 'pop up' stores are potentially viable on this site. The overall theme would be to provide a relaxed beach offering, that is able to appropriately respond to seasonal demand, with sufficient capacity to expand as the settlement expands and can support additional activity. The site

coverage proposed for retail or commercial activity, at 15%, is assessed as being unnecessarily restrictive of the opportunities for this site. Provision for additional site coverage will enable a greater range of potential offerings to be explored and provided.

Amendment sought: WRL seeks a site coverage restriction of 20% for the Waitarere Beach Mixed Use Area, either generally or for the WRL Land.

Enabling a variety of lot sizes and layouts – Waitarere Beach Greater Density Area - balance of the WRL land

WRL supports the proposed provisions enabling higher density lots. However the wording of the proposed provisions would restrict flexibility of lot sizes and layout in order to meet market expectations and thus deliver the urban outcomes envisaged by the plan change. For example, PC5 provides that any subdivision that is not in accordance with Structure Plan 07A is a non-complying activity.

PC5 will enable a large number of additional residential lots at Waitarere. High density lots on the WRL Land may prove to not be as attractive to buyers, in that context. It is possible that the development of land in this area could stall because of an expectation that the higher lot density envisaged is desirable to the market, when in fact this may not be the case. The higher order policy is to enable a variety of lot sizes – an unduly prescriptive approach to development density could have the opposite effect to the outcome intended by the plan change.

Amendments sought: greater flexibility to enable a range of lot sizes and layouts for the balance of the WRL land in the Waitarere Beach Greater Density Area, including such changes as may be assessed by the landowner as appropriate in order to meet market

demand. Include provision that the Structure Plan layout for the WRL land is indicative only and may be amended through the resource consent process.

Amendment to activity status - where subdivision is not at the density or layout envisaged by the structure plan this should require consent for a restricted-discretionary activity.

4. My submission

My submission is that:

Waitarere Rise Limited (WRL) supports Plan Change 5, with amendments as follows:

General submission

WRL owns a block of land at the corner of Waitarere Beach Road and Waitarere Rise Avenue that is proposed to be rezoned by PC5 ("the WRL Land"). PC5 rezones the WRL Land as part Waitarere Beach Mixed Use Area and part Waitarere Beach Greater Density Area.

WRL supports the proposed rezoning of the land, with amendments set out in this submission.

Site coverage - Waitarere Beach Mixed Use Area

For the Waitarere Beach Mixed Use Area site coverage for retail and commercial activities is limited to 15%. The Waitarere Beach Mixed Use Area land on the WRL Land is a strategically located and high profile site setting at the gateway to Waitarere Beach. This site has the potential to 'set the tone' for the beach settlement experience. WRL envisages a central commercial activity (restaurant or café) and possibly a number of kiosks or 'pop up' stores are potentially viable on this site. The overall theme would be to provide a relaxed beach offering, that is able to

appropriately respond to seasonal demand, with sufficient capacity to expand as the settlement expands and can support additional activity. The site coverage proposed for retail or commercial activity, at 15%, is assessed as being unnecessarily restrictive of the opportunities for this site. Provision for additional site coverage will enable a greater range of potential offerings to be explored and provided.

Amendment sought: WRL seeks a site coverage restriction of 20% for the Waitarere Beach Mixed Use Area, either generally or for the WRL Land.

Enabling a variety of lot sizes and layouts – Waitarere Beach Greater Density Area - balance of the WRL land

WRL supports the proposed provisions enabling higher density lots. However the wording of the proposed provisions would restrict flexibility of lot sizes and layout in order to meet market expectations and thus deliver the urban outcomes envisaged by the plan change. For example, PC5 provides that any subdivision that is not in accordance with Structure Plan 07A is a non-complying activity.

PC5 will enable a large number of additional residential lots at Waitarere. High density lots on the WRL Land may prove to not be as attractive to buyers, in that context. It is possible that the development of land in this area could stall because of an expectation that the higher lot density envisaged is desirable to the market, when in fact this may not be the case. The higher order policy is to enable a variety of lot sizes – an unduly prescriptive approach to development density could have the opposite effect to the outcome intended by the plan change.

Amendments sought: greater flexibility to enable a range of lot sizes and layouts for the balance of the

WRL land in the Waitarere Beach Greater Density Area, including such changes as may be assessed by the landowner as appropriate in order to meet market demand. Include provision that the Structure Plan layout for the WRL land is indicative only and may be amended through the resource consent process. Amendment to activity status - where subdivision is not at the density or layout envisaged by the structure plan this should require consent for a restricteddiscretionary activity.

Submission Attachments:

5. Decision sought

I/We seek the following decision from the Horowhenua
To alter the plan change to meet our request as **District Council:**

described above.

6. Proposed Plan Change Hearing

Do you wish to speak in support of your submission at the hearing?	Yes
If others make a similar submission would you be prepared to consider presenting a joint case at the hearing?	Yes
Would you like to make your verbal submission in Te Reo Māori?	No
Sign language interpretation required?	No

Declaration

Signature of Submitter:	Name of signatory: Roger Colin Truebridge
	Link to signature
Date:	27/04/2021
Office Use Only	
Date Received:	
CM9 Number:	

Submission No:



Submission 8 – Waka Kotahi NZ Transport Agency (WKNZTA)



FORM 5

Submission on a notified proposal for Plan Change 5 – Waitarere Beach Growth Area under Clause 6 of Schedule 1 of the Resource Management Act 1991

27 April 2021

Strategic Planning Team Horowhenua District Council Private Bag Levin 1234

Via Email: districtplan@horowhenua.govt.nz

This is a submission on a change proposed to the following plan:

Proposed Plan Change 5 to the Horowhenua District Plan (PC5).

The specific provisions of the proposal that our submission relates to are:

PC5 in its entirety to the extent the provisions have the potential to compromise Waka Kotahi NZ Transport Agency's (Waka Kotahi) statutory obligations.

Waka Kotahi is supportive of Horowhenua District Council's (Council) proactive approach to planning for urban growth. We wish to work together with Council to achieve great outcomes for the Waitarere Beach community.

Waka Kotahi is committed to continuing our collaboration with Council to understand the impact of PC5 and the operation of the transport network. However, Waka Kotahi must at this stage reserve its position. This is because the information about the transportation effects of PC5 and the impact on the state highway network, have not yet been fully addressed.

Waka Kotahi's submission is:

- 1. PC5 may have adverse effects on the ongoing operation and safety of the state highway network. The Waitarere Beach Road/State Highway 1 intersection has existing safety and capacity issues, as identified in Council's section 32 report (page 54). Waka Kotahi needs to understand if there will be any adverse effects and an integrated transport assessment is therefore required.
- 2. An integrated transport assessment (ITA) is required to demonstrate how:
 - (a) this intersection will operate with the additional vehicle movements expected from the development of 700 residential lots and commercial activities.
 - (b) if there will be implications, including cumulative effects, on the wider transport network, especially given the indicative development and infrastructure improvements to the south of Waitarere (Tara-Ika and Otaki to North of Levin).

- 3. An ITA would provide detailed analysis of the predicted 60% housing occupancy rate relied upon in Council's section 32 report, whilst also considering vehicle movements from visitors. An ITA would also provide traffic modelling against the projected 20-year development timeframe against existing traffic flows, and at various stages of residential development. These are all critical factors that will affect the use of the SH1 intersection and driver's exposure to risk of death and serious injuries (DSI's).
- 4. Waka Kotahi support Council's proactive approach to planning for urban growth, but that growth cannot be advanced without understanding if the development can occur safely and in a manner that does not compromise the state highway network.
- 5. Waka Kotahi makes this submission on PC5 for the following reasons:
 - a. to ensure the additional development at Waitarere Beach is assessed from a transport effects perspective;
 - b. to ensure any adverse effects on the Waitarere Beach Road/SH1 intersection are assessed and mitigation is provided if required; and
 - c. to ensure the only existing vehicle access (transport link) to Waitarere Beach is safe and resilient.

Waka Kotahi's Statutory Functions, Powers and Responsibilities

- 6. Waka Kotahi's statutory objective under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.
- 7. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport 2018/19-2027/28 (GPS).
- 8. In September 2020, the Minister of Transport released the GPS 2021, which will take effect from 1 July 2021. It builds on the strategic direction set in the earlier GPS and has four strategic priorities:
 - Safety
 - Better travel options
 - Improving freight connections
 - Climate Change
- 9. The Ministry of Transport (MOT) Transport has issued its 'Outcomes Framework' to define the long-term strategic outcomes for New Zealand's transport system and explain how government and the transport sector should work together toward these outcomes.
- 10. The MOT Framework describes the following five long-term outcomes for the transport system:
 - a. Inclusive Access:
 - b. Economic Prosperity:
 - c. Resilience and Security:

- d. Environmental Sustainability:
- e. Healthy and safe people:
- 11. Waka Kotahi supports planned development in appropriate areas and considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience, and safety of the transport network. Therefore, Waka Kotahi seek to participate in these proceedings to ensure that the Plan Change provisions do not adversely affect the state highway network.
- 12. Given the safety and capacity issues with the SH1 intersection, Waka Kotahi consider it imperative that an agreed understanding of the impacts of this plan change on the transport network is formed. Normally as part of the section 32 assessment an ITA would be included to quantify the impact and potential effects of the residential and commercial development resulting from PC5.
- 13. Waka Kotahi could not gain an advantage in trade competition through this submission.

The State Highway 1/Waitarere Road Intersection

- 14. The first priority of the GPS is safety.
- 15. Unfortunately, at this intersection there is a long history of DSIs. Added vehicle movements resulting from the proposed housing development and commercially zoned land, would exacerbate this, even over a 20-year timeframe.
- 16. As referred to in Council's section 32 report, this intersection is located on a stretch of State Highway 1 that has been identified by Waka Kotahi, to be included in short-term safety upgrades as part of the Safe Networks Programme (SNP). Known as the "North of Levin Project" and taking over from the previous "Waitarere Curves Project," the project is in a scoping phase (investigating safety improvement options) and is working towards feasibility design.
- 17. As part of this SNP project, community consultation was undertaken. The Waitarere Beach Progressive and Residents Association made a submission in support of the North of Levin project. Their submission identified the Association's concerns in using the State Highway 1/Waitarere Beach Road intersection.

Proposed Development Timeframe and Predicted Housing Occupancy Rate

- 18. Waka Kotahi want to further discuss with Council about its projected 20-year development timeframe and the "gradually over time..." development of the residential lots per year (section 32 report page 55), especially given the current unpredictable housing market.
- 19. Waka Kotahi also want the Council to clarify the predicted housing occupancy rate of 60% (section 32 report page 56). Paragraph 6.1.1.2 of the section 32 report states that "improvements to the State Highway network have also made it a popular location for permanent residents...". Waka Kotahi want to discuss further with Council because these predictions will influence the intersection's level of service, traffic flow and the risk of DSIs.

Waka Kotahi seek the following decision from the Council:

20. Amend PC5 to address the concerns raised and alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission;

- 21. Seek ongoing conversation with the Council to continue;
- 22. Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:

Natasha Reid

Principal Planner – Environmental Planning Waka Kotahi NZ Transport Agency Environmentalplanning@nzta.govt.nz



Submission 9 – Horizons Regional Council



27 April 2021

RAI 04 01 2020/04508 PAT:MLB

Milcah Xkenjic Strategic Planner Horowhenua District Council Private Bag 4002 **LEVIN 5540**

BY EMAIL ONLY: districtplan@horowhenua.govt.nz

Dear Milcah,

PROPOSED PLAN CHANGE 5 – HORIZONS' SUBMISSION

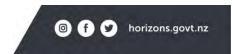
Thank you for the opportunity to make a submission on the Horowhenua District Council's (HDC) Proposed Plan Change 5 (PPC5) – Waitārere Beach Growth Area.

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

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

Horizons could not gain an advantage in trade competition through this submission; our interest in PPC5 is primarily as the regional authority for the affected area. In this submission we consider the proposed district plan changes in the context of giving effect to the regional policy statement components of Horizons' One Plan, and ensuring that these changes would not be inconsistent with our regional plan provisions¹. In addition, we are mindful that the National Policy Statement for Freshwater Management (2020) Policy 3.5(4) directs territorial authorities to include objectives, policies and methods in district plans to address the adverse effects of urban development on the health and well-being of waterbodies, freshwater ecosystems and receiving environments. We also comment from the perspective of Horizons' role in leading and advocating for land transport outcomes in the region.

Horizons generally supports plan changes to provide for growth that have as their basis a growth strategy and/or master plan. This approach is, in general, considered to give effect to One Plan Objective 3-3 and Policy 3-4, both of which provide for the strategic integration of



¹ As set out in section 75 of the Resource Management Act 1991



infrastructure with land use. However, we have significant concerns about some aspects of the proposal, as set out in our comments below.

Our submission is focused primarily on indigenous biodiversity habitat and stormwater; there is considerable overlap between these two issues.

Indigenous biodiversity

The One Plan uses a predictive approach to managing activities affecting indigenous biodiversity habitat, by describing habitats (in Schedule F) and identifying them as rare, threatened or at-risk. Activities affecting those habitats are regulated, with a non-complying activity status for rare and threatened habitats and discretionary for at-risk. Activities adjacent (within 5 or 10 metres) to some habitat types are also regulated.

Horizons does not identify specific sites in the One Plan, and does not hold exhaustive information on the location and state of all rare, threatened and at-risk habitat in the region, particularly on private land. The information we hold for the Waitārere Beach Growth Area is limited to the Wairarawa Lagoon and associated wetland area, an area that we understand meets the description of swamp and marsh and is categorised as threatened habitat in One Plan Schedule F. This information has been shared with HDC during plan preparation and pre-notification consultation.

With regard to PPC5, Horizons supports the recognition of this area of threatened indigenous biodiversity habitat through establishment of Open Space Zone, and through Objective 6.3.30A, 11th bullet point ("Protects and restores ecological features..."). However, the basis for identifying the extent of this area is unclear; we are also concerned by the indicative design for this area in the Master Plan, which shows roading and development adjacent to open water. We are also uncertain where policy support for this objective is located; there is nothing included in proposed amendments to Chapter 6, and existing policies in Chapter 4 emphasise public access and recreational values rather than ecological values.

Horizons noted a number of concerns in relation to the protection of Wairarawa Lagoon and wetland from the effects of areas in the adjacent area in its pre-notification advice.

Firstly, we were unable to make a conclusive comparison of the extent of the proposed Open Space Zone with Horizons' mapping of the area of threatened habitat. While it appears that the Lagoon and wetland are within the zoned area, it may not cover the entire area. We remain concerned; neither the Master Plan nor proposed Structure Plan 7A give us confidence that PPC5 recognises the full extent of this threatened habitat.

We considered that there is a high risk of discharges entering the habitat due to the proximity of proposed areas of development and roading to the Lagoon and wetland. In particular, we are very concerned about the potential for stormwater to discharge into the area. The Master Plan Design Description for 'The Lakes' area states that the indicative design "signals sensitive stormwater management"; however, this appears to constitute using the natural waterbodies as a stormwater discharge and detention area, contrary to the intent of the District Plan policy and regulatory framework for the management of stormwater effects. Our concerns relating to the management of stormwater more generally are discussed in detail below.

We note that the One Plan regulates activities including land disturbance and vegetation clearance within 10 metres of any area of Schedule F wetland habitat; activities within the



extent of any area of threatened habitat, including discharges of water and contaminants, are a non-complying activity. The National Environmental Statement for Freshwater (NESF) also regulates activities in and within setbacks from wetlands; diversions and discharges of water within, and within a 100 metre setback, of a natural wetland are non-complying activities.

Overall, Horizons is extremely concerned that the proposed structure plan, provisions and Master Plan for the area does not provide an adequate policy and regulatory framework to protect the values of the Wairarawa Lagoon and wetland. Further, PPC5 as proposed establishes an expectation of development through the enabling approach to subdivision and development, which appears in some areas to be inconsistent with the One Plan Part II (Regional Plan) and NESF.

Horizons is also concerned that there may be other areas of indigenous habitat in the area that have not been identified or assessed; we note for example that areas currently zoned as open space in Structure Plan 7 containing 'indicative landscape features' (a strip along the northern side of Waitārere Beach Road) have been removed in proposed Structure Plan 7A. It has recently come to our attention that there may be another area of indigenous biodiversity habitat on privately-owned land east of Forest Road within the Growth Area. We note that there does not appear to have been any ecological assessment carried out to inform this plan change. These areas may be Schedule F 'inland duneland', which is classified as a rare habitat type.

Horizons therefore supports:

- 1) Objective 6.3.30A, 11th bullet point ("Protects and restores ecological features...")
- 2) In principle, the identification and zoning of the Wairarawa Lagoon and wetland as Open Space.

We <u>request</u> that:

- 3) An assessment of the proposed Growth Area be undertaken by a qualified ecological expert to:
 - a) identify the full extent of the Wairarawa Lagoon and wetland threatened habitat area, to ensure that the full extent of this habitat is identified; and
 - b) Identify any other areas of rare, threatened or at-risk habitat in the area so that they can be appropriately protected;
- 4) The extent of the Open Space Zone and adjacent zones be adjusted, if necessary, to ensure the values of the threatened wetland habitat can be safeguarded adequately;
- 5) A policy be inserted to guide the achievement of Objective 6.3.30A 11th bullet point
- 6) That the policy and rule frameworks applying to all areas within, and within an appropriate setback distance of the Lagoon and wetland be amended to recognise and protect the values of the area and to ensure consistency with the One Plan Part I (Regional Plan) and NESF.
- 7) That any additional areas of rare, threatened or at-risk habitat in the Growth Area are recognised in the District Plan through mechanisms including but not limited to rezoning and the amendment or insertion of objectives, policies and rules to protect their values and to ensure consistency with the One Plan Part I (Regional Plan) and NES FM;
- 8) Inclusion of additional advice notes for plan users referring them to Horizons and the One Plan; and
- 9) Any further, alternative or consequential relief that achieves these outcomes.



Stormwater

There are two key aspects to the management of stormwater:

- i. the effects on water quality from direct (point-source) and indirect (diffuse) discharges of untreated stormwater, which may contain a range of contaminants, including hydrocarbons, sediment, nutrients and agrichemicals, and bacteria, into surface water bodies and groundwater; and
- ii. inundation and the potential for stormwater to become, or exacerbate, flood hazard.

With regard to the second of these aspects, One Plan Chapter 9 Natural Hazards regional policy framework specifically notes that flood event' excludes the effects of stormwater, as these effects are managed by territorial authorities through criteria such as engineering, subdivision and design standards and manuals.

However, One Plan Chapter 14 Discharges to land and water permitted activity Rule 14-18 allows discharges of stormwater to surface water provided conditions and standards are met, including that discharges of stormwater to land cannot result in overland flows discharging to natural surface water bodies other than in rain events that are at least the 10% annual exceedance probability design storm. Nor can any discharge cause or exacerbate flooding on any other property. Discharge to areas of threatened habitat such as Wairarawa Lagoon is a non-complying activity.

Horizons acknowledges that the intent of HDC District Plan's framework for the management of stormwater, in the absence of a centralised network, is that stormwater must be managed on-site. We understand this is done through the application of NZS4404:2004 Land Development and Subdivision Infrastructure and HDC's Subdivision and Development Principles and Requirements (version: July 2014), which is supported by the provisions in Rule 24.2.4(a) in particular, and zone-specific policies and rules such as Policy 6.3.9 and proposed Rule 15.7.5(a). The Section 32 report (page 8) states in relation to One Plan Objective 5-2: Water Quality, that

The proposed growth area will be required to manage stormwater in accordance with the existing Operative District Plan framework. This requires stormwater discharges to be managed on-site.

We note, firstly, that the level of management is not consistently articulated across the range of documents. The standards required by the Subdivision and Development Principles and Requirements are also ambiguous; for example, section 10.2 Strategy states

Developers <u>shall demonstrate conclusively that development will not increase</u> <u>existing stormwater issues</u> on any properties...

While the following paragraph states

It is the Council's objective to develop stormwater systems that <u>minimise the risk</u> of surface water flooding... The Council seeks high standard sustainable stormwater systems that <u>minimise the effect</u> of flooding, erosion and water pollution... (emphasis added).



The following section (Stormwater Management) states "Stormwater systems shall <u>mitigate</u> physical and environmental impacts..." and "The Council <u>encourages</u> the development of stormwater systems that will have low impact on the receiving environment".

We are unclear whether the District Plan has as its intent the management of stormwater to <u>avoid</u> its effects, or merely mitigate. We are also unclear whether the policy and rule framework supporting objectives (such as Policy 6.1.4) which do seek avoidance, provide adequate support in practice for officers to require avoidance – see for example proposed Rule 15.7.5(a) matter of control (xiv) "... the avoidance <u>or mitigation</u> of... surface water ponding or inundation" and the proposed new assessment criterion in 25.2.5, "The extent to which the subdivision of land covered by SP 07A – Waitārere Beach <u>avoids or mitigates</u>... surface water inundation" (emphasis added).

We are concerned that there does not appear to be any provision in the existing District Plan provisions (based on our reading of Chapters 15, 17 and 24) or PPC5 that requires ongoing maintenance of stormwater systems.

It is also unclear to us why the approach in PPC5 is not consistent with the proposed rule framework for PPC4 – Tara-ika Growth Area, which requires all dwellings to have a rainwater tank for the collection of stormwater (PPC4 proposed Rule 15A.6.2.1).

In relation to the management of stormwater, Horizons seeks:

- a coherent, consistent framework in the District Plan that enables HDC to require the avoidance of adverse effects, through mechanisms including but not limited to the amendment or insertion of objectives, policies and rules to ensure that the standards and conditions for the establishment and ongoing maintenance of stormwater management systems are explicit and clear, and there is consistency with the One Plan Part I (Regional Plan) and NESF;
- 11) Any further, alternative or consequential relief that achieves these outcomes.

Other matters:

Transport: Horizons' comments on proposed provisions relating to transport networks, modes, safety and connectivity are made in the context of the Regional Land Transport Plan 2015-25 (2018 review) (RLTP) and One Plan Policy 3-7. The former includes six regional objectives, of which the following are most applicable here:

- 3. A safe land transport system increasingly free of death and serious injury; and
- 4. A reliable multi-modal transport system with less modal conflict, including walking and cycling, that mitigates potential environmental effects and improves environmental outcomes.

These strategic priorities have been identified to deliver the objectives:

- An integrated walking and cycling network; and
- Effective, efficient, accessible and affordable multi-modal transport networks.



The RLTP is currently being reviewed and the Regional Land Transport Committee is currently considering submissions. The draft plan includes an even stronger emphasis on connectivity, user choice, public transport and safety.

One Plan Policy 3-7 (c) states:

Territorial Authority decisions and controls on subdivision and land use must ensure that sustainable transport options such as public transport, walking and cycling can be integrated into land use development.

Horizons supports the inclusion of objectives, policies and rules to provide for connectivity, safety, and choice, but notes the lack of specific provision for public transport in the proposed plan provisions (and Master Plan). As proposed, we consider that the development expected to result from PPC5 would support increased public transport services. We therefore urge HDC to incorporate provision for future public and school bus services into PPC5.

- 12) Specifically, Horizons generally supports those parts of Policy 6.3.30A relating to connectivity, but requests the following addition:
 - o create safe, slow speed streets for residents;
 - o <u>enables public transport services, including school buses;</u>

...

Natural hazards: Horizons supports the inclusion of provisions relating to liquefaction and lateral spread in PPC5.

Energy efficiency: One Plan Objective 3-2: Energy and Policy 3-7: Energy efficiency address improvements in the efficiency of the end use of energy and use of renewable energy in the region. Of particular relevance to PPC4 is Policy 3-7 (b) 2 , which states:

Territorial Authority decisions and controls on subdivision and housing, including layout of the site and layout of the lots in relation to other houses/subdivisions, must encourage energy-efficient house design and access to solar energy.

As notified, we do not consider that PPC5 gives full effect to this policy.

It is our view that access to solar energy is already provided for through District Plan Policy 12.2.3 and permitted activity rules which together enable domestic-scale renewable energy. Policy 12.2.14 is to

Encourage subdivision and development to be designed so that buildings can utilise energy efficiency and conservation measures, including by orientation to the sun and through other natural elements, to assist in reducing energy consumption.

However, we are unsure how HDC implements this as there do not appear to be any provisions or methods in the operative plan provisions in Chapter 15 Residential Zone, Chapter 22 Utilities and Energy Rules, or Chapter 24 Subdivision. We consider that it is

² Policy 3-7(c) is considered in the previous discussion on transport.



appropriate for a plan change to enable urban growth at the scale of PPC5 should explicitly incorporate this matter, and suggest that this could appropriately be achieved through the following amendments:

- 13) Amend proposed Policy 6.3.30A to include an additional bullet point:
- Require subdivision layout that will enable building to utilise energy efficiency and conservation measures.
- 14) Amend Rule 15.7.5(a) Subdivision of Land Matters of Control to include consideration of energy efficiency, conservation and access to solar energy.

Horizons seeks the relief set out in its submission above, or any further, alternative or consequential relief that achieves the outcomes sought.

Horizons reserves the right to be heard in relation to this submission. If others make a similar submission, Horizons would consider making a joint presentation to the hearing panel.

Yours sincerely,

Pen Tucker

SENIOR POLICY ANALYST

ADDRESS FOR SERVICE:

Pen Tucker Senior Policy Analyst Horizons Regional Council Private Bag 11025 Manawatū Mail Centre PALMERSTON NORTH 4442

Email: penelope.tucker@horizons.govt.nz

inclope rucky



Submission 10 - MDHB Public Health Service

SUBMISSION ON A NOTIFIED PROPOSED PLAN CHANGE UNDER CLAUSE 6 SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991

To the Horowhenua District Council.

This is a Submission by: MidCentral District Health Board's (MDHB's) Public Health Service (PHS).

- 1. Proposed Policy Statement/Plan or Plan Change Proposed Plan Change 5, Waitārere Beach Growth Area
- 2. This submitter is not a trade competitor for the purposes of s.308B of the Act.
- 3. The broad reason for these submissions is to provide objective and independent input to promote the reduction of adverse effects on the health of people and communities pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
- 4. MidCentral District Health Board's (MDHB's) Public Health Service (PHS) has statutory obligations for public health within this area under Crown funding agreements between the Ministry of Health and the MidCentral District Health Board. The Ministry of Health requires public health services to reduce any potential health risks by means including submissions on any Proposed Policy Statements, Plans, including Changes or Variations to Changes thereto concerning matters of public health significance are considered by the local authority. The proposal covers matters with potential health effects on people and communities.
- 5. The specific parts of the Proposed Plan Change to which this Submission relates to are shown in the attached schedule including whether we support, oppose or are neutral regarding the specific parts or wish to have them amended, and our reasons are stated.
- 6. The decision we seek from the Council is set out in the attached schedule together with precise details. Where we seek amendment to the proposals by stating new words to be inserted into the provisions, or seek amendment to the wording of specific parts, we assert that the scope of our submission is intended to also cover words to the like effect in the specific part or elsewhere in the proposal or otherwise in the Plan, which might be consequentially added or amended.
- 7. We attach in a Schedule how that provision in the proposal should be modified.
- 8. This submitter wishes to be heard in support of these Submissions at any hearing but is not prepared to consider presenting a joint case with other submitters. This submitter is willing to participate in any pre-hearing conferences, or mediation.

Date 27th day of April 2021.

Name: Dr Robert Holdaway

a person authorised to sign on behalf of MDHB's Public Health Service

Address for service

Contact person: Dr Robert Holdaway

Email: PublicHealthOps@midcentraldhb.govt.nz

Telephone: 06-3509110

Postal address: Private Bag 11036, Palmerston North

Schedule of Submissions by MDHB's Public Health Service

1. Submission 1.

Submission relates to this specific part of	Amend Table 15.4 , RULES: Residential Zone
proposal	

Regarding this part, we wish amendment to this part.

For the following reasons.

If the plan change is adopted and subsequent residential development occurred without the implementation of a reticulated water supply, that could create one of the largest urban areas in New Zealand without a reticulated water supply. The addition of 700 residential lots and potentially that many new dwellings as proposed through the plan change could be in addition to growth modelled for Waitārere Beach in the Horowhenua Growth Strategy 2040.

Private roof water supplies in urban areas are prone to chemical and microbiological contamination and can be a health risk if adequate treatment and ongoing maintenance does not occur.

Although not our area of expertise, we also note there is no mention of adequate water capacity for firefighting purposes without a reticulated water supply for the growth area. Smoke from building fires contain toxins and pose a risk to public health. In addition to the risk to life of the fire itself, any delay in a fire being put out would increase smoke output from the fire, increasing the likelihood of exposure to that smoke and increasing the likelihood of people experiencing adverse health effects due to smoke inhalation.

The effects of climate change requires particular regard as another matter under section 7 of the RMA. If severe drought conditions occurred and a large number of residences ran out of water, there is no guaranteed contingency that tankered drinking water could be provided to potentially such a large number of residences without significant delays. The adequate supply of potable water is a fundamental public health requirement. We do not consider that the effects of climate change have been adequately considered for the proposed growth area should a reticulated water supply not be implemented.

We submit that District Rules require that development of the residential and high density residential areas (as defined in the Waitārere Beach Master Plan) of the Waitārere Beach Proposed Growth Area should be on the condition that dwellings are linked to reticulated water supply in addition to reticulated wastewater. To remove any doubt, we submit that such a requirement would only apply to land at Waitārere Beach that is not currently zoned residential, only to land that would be newly zoned as residential under the proposed zoning changes for Waitārere Beach. We do not intend to inhibit any growth and residential development on land currently zoned residential at Waitārere Beach, rather to ensure that a sizable urban area is not created without a reticulated water supply.

Submission by MDHB's Public Health Service on Proposed Plan Change 5

The recommendation/decision sought is to add the following new provision:

That a **new row is inserted into the table 15.4 Under a Heading 'Waitārere Beach** Growth **Area'** or some such definition that defines any rezoned residential and high density residential area **of the Waitārere Beach Growth Area**.

'Waitarere Beach Growth Area, Residential Zone'					
Residential Allotments	Where reticulated water and sewerage disposal is available	450m ²	18 meters diameter		

2. Submission 2.

Submission relates to this specific part of	6.1.1.2 Waitārere Beach settlement profile
proposal	

Regarding this part, we wish amendment to this part.

For the following reasons.

Changes to paragraph two of the settlement profile has had the statement removed;

'There are some areas of underdeveloped land available for future residential development although the extent of future development may be constrained unless sufficient water supply and wastewater disposal can be guaranteed.'

The section 32 report notes that water supply for dwellings and other buildings is expected to be from individual roof supply and groundwater bores. The report notes proposed improvements to wastewater supply but includes no assessment of reticulated water supply except the assumption that water supply would likely be private supply as Council has yet to decide on provision of a reticulated water supply for Waitarere Beach. Under the HDC Infrastructure Strategy, 2021-2051, a decision on the implementation of a reticulated water supply for Waitārere Beach would not be made until 2032. We cannot identify any assessment of drinking water requirements in the section 32 report that justifies the removal of the statement as noted above in relation to water supply.

The recommendation/decision sought is amend this provision as follows:

That the statement; 'There are some areas of underdeveloped land available for future residential development although the extent of future development may be constrained unless sufficient water supply can be guaranteed.' is inserted into Paragraph two where the sentence as noted above had been removed.

3. Submission 3.

Submission relates to this specific part of proposal Infrastructure requirement of Plan Change 5, Amend rule 15.8.16, (b)(i).

Regarding this part, we wish amendment to this part. For the following reasons.

This rule would allow for a minimum lot size of 250m² for the Forest Hill Integrated Residential Development. Under the proposed plan change and existing integrated residential development rules, although consent would be required, lots of 250m² with onsite water supply could be built. Without reticulated water supply, roof water would be the most likely source of drinking water. The section 32 report does not confirm that an adequate roof collection area or sized tank for a drinking water supply could be located within such a small section whilst meeting other rules as required by the District Plan. Smarthomes recommend that for year round water supply, at least a 30,000lt tank is required. A 30,000lt tank has a diameter of 3660mm and an area of 10.52m². Without confirmation that such a tank or equivalent tanks could be located with buildings within a 250m² lot, no reasonable assumption can be made that an adequate supply of water could be provided. Adequate potable water is a public health requirement.

The HDC Long-Term Plan consultation document 2021-2041 notes that the Horowhenua District is likely to experience decreased summer rainfall as a future effect of climate change. Unless properties had adequate water storage capacity and roof catchment area, these properties would be prone to running out of water and be reliant on tankered suppliers for tank filling.

The recommendation/decision sought is amend this provision as follows:

That 15.8.16 (b) (i) is amended to read:

'For the Forest Road Integrated Residential Development Area, the minimum lot size shall be 250m² where reticulated water and wastewater disposal is available.'



Submission 11 – Waitārere Sands Limited





Client: Waitarere Sands Limited - April 2021





SUBMISSION FOR: Waitarere Sands Limited

Prepared by:

Bryce S Holmes

Principal Planner and Director

Date:April 2021Version:FINALJob Ref:J627

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RMA FORM 5

Submission on publicly notified Proposed District Plan Change

Clause 6 of the First Schedule, Resource Management Act 1991

To: Horowhenua District Council

1. Submitter details:

Full Name			
Company/Organisation	Waitarere Sands	Limited (WSL)	
if applicable			
Contact Person	C/- Bryce Holmes	, Land Matters Ltd	
if different			
Email Address for Service	bryce@landmatters.nz		
Address	20 Addington Road		
	City		Postcode
	Otaki		5581
Address for Service	Postal Address		Courier Address
if different			
Phone	Mobile	Ноте	Work
	021 877 143		06 364 7293

- 2. This is a *submission* on the **Proposed District Plan Change** for Horowhenua District Council.
- 3. I could not gain an advantage in trade competition through this submission.

If <u>you could</u> gain an advantage in trade competition through this submission please complete point four below:

4. I am directly affected by an effect of the subject matter of the submission that:



- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

Note:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

- 5. I wish to be heard in support of my submission.
- 6. I will not consider presenting a joint case with other submitters, who make a similar submission, at a hearing.

Please complete section below (insert additional boxes per provision you are submitting on):

ne specific provision of the proposal that my submission relates to:
ee part 3.
o you: Support? Oppose? Amend?
ee part 3.
/hat decision are you seeking from Council?
/hat action would you like: Retain? Amend? Add? Delete?
easons:
ee part 3.



1. BACKGROUND AND INTRODUCTION

The submitter owns a large land holding within the Plan Change area. That land holds the key to public infrastructure including roading, wastewater and reserve networks. The submitter has engaged with Council on its vision for the land which is to build on the current Waitarere Beach amenity. This document is a submission on Plan Change 5 and is consistent with the current engagement with Council.

2. THE LAND

The land is located in the south and east of the existing Waitarere Beach settlement. The property details are:

Address: 40 – 46 Forest Road, Waitarere Beach

Legal Description: Lots 1 and 2 DP 532783
Certificates of Title: 872943 and 872944
Area: 12ha (approx.)

3. THE SUBMISSION AND CHANGES SOUGHT

The submitter generally **supports** the following parts of the Proposed Plan Change 5:

1. Showing part of the land as appropriate for **Urban Development** on the Planning Maps.

The submitter generally **opposes** the following parts of the Proposed District Plan Change:

- 2. The current content of the master plan and layout of the structure plan applicable to the land. The proposed road connections do not provide for a high level of amenity within the land;
- **3.** The restrictive nature of the planning provisions in the Plan Change including the policies, rules and standards.

The submitter **seeks** the following general amendments to the document to better achieve the Purpose of the RMA and the Principles of the Master Plan:

a. **Amendments to the structure plan and planning maps** to reflect the submitters layout contained in appendix 1.

Reasons: The Submitter has undertaken a detailed fine grained analysis of its land holding. The current master plan and structure plan do not locate roads (particularly the east – west connections) in the most appropriate locations. In addition there are too many roads which will severely undermine amenity within the land. The structure plan has been designed around car movement rather than pedestrian movement.

b. Without limiting the general opposition in A above, the specific parts of the plan the submitter seeks are contained in the following table:



Plan Provision	Support/	Reason	Relief Sought
	Oppose		
Chapter 6: Urban Environment	Support	Support the general intent to provide for further	Retain the issue discussion as
Environment		residential development in	proposed.
		Waitarere Beach.	
		Walter Cre Beach.	
Policy 6.3.30A	Oppose	The submitter opposes parts	Amend policy 6.3.30A to the
		of this policy as it guides	following (or similar intent):
		towards a restrictive planning	
		framework for the structure	Policy 6.3.30A
		plan area. The roading	_ ,, ., .,
		network needs to provide for	Enable residential
		a high level of residential amenity without a series of	development in the area identified on Structure Plan
		inappropriate 'east – west'	07A – Waitarere Beach that is
		connections through the	in general accordance with
		Submitters land. The policy	the structure plan and that:
		should reflect that.	•
			● Incorporates a n
			interconnected
			network of streets
			and movement links
			that:
			 Provide
			connections to
			local amenities
			such as the
			beach and
			existing commercial
			centre, including
			good pedestrian
			and cycle access;
			• and;
			 Integrate with
			the open space
			network; <u>and</u>
			 <u>Does not distract</u>
			<u>from residential</u>
			<u>amenity values</u>
			<u>within the</u>
			<u>structure plan</u>
D. II. 6.2.20D			area.
Policy 6.3.30B	Oppose	The policy does not provide	Amend policy 6.3.30B to (or similar intent):
		for flexibility within the structure plan area. There is	Provide for a range of housing
		a need to have a market	types in the area identified on
		based approach to residential	Structure Plan 07A – including
		outcomes within other parts	Waitarere Beach by enabling
		of the structure plan area	the creation of smaller
		including the Submitters land	residential lots in the



		which is flat in areas and also next to open space areas.	Waitarere Beach Greater Housing Area, recognising that these areas have the benefit of being relatively flat adjacent to public open space.
Chapter 15 Residential Zone – Rules 15.4 (b) and 15.4 (c)	Oppose	Those rules contain subject terms that rely on the plan readers judgement as to compliance or otherwise. The rules should be clear and without subjectivity. Rule 15.4(c) (non-complying activity) is too restrictive.	Amend the specified rules to include rule 15.4(b) as a matter of discretion for assessment. Remove rule 15.4(c) and include discretionary activity rules for the same.
Chapter 15 Residential Zone - Table 15.4: Standards applying to Subdivision and Residential Dwelling Units as following:	Oppose	There needs to be a more flexible approach to subdivision lot size within the structure plan area.	Amend table 15.4 to (or similar intent): In addition to rule 15.8.16(b)(i), the average lot size within Structure Plan 07A area shall be 600m² with a minimum lot area of 450m².
Chapter 15 Residential Zone - Rule 15.8.16 Integrated Residential Development	Oppose	The Submitter has undertaken a full analysis of its holdings and does not support the Council's layout approach to east – west connections through its lands.	Amend the structure plan to reflect the Submitters detailed plan for it land holding (or similar intent).
Planning Maps – Waitarere Beach	Oppose	The Submitter has undertaken a full analysis of its holdings and does not support the Council's layout approach to east – west connections through its lands.	Amend the maps to incorporate WSL plans in the Structure Plan and Master Plan (see appendix 1 and appendix 2).
Master Plan and Section 32 Analysis	Oppose	The submitter has consistently outlined to Council that its master plan is not practical and will not achieve the objective to provide for development in Waitarere Beach. The Master Plan should be amended in accordance with the Submitters submission on the Master Plan (see attached).	Amend the maps and provisions to incorporate WSL plans in the Structure Plan and Master Plan (see appendix 1 and appendix 2).

In general, there is an opportunity to master plan the WSL property for the benefit of Council and stakeholders with an interest in the area. We consider the opportunity to manage over 12ha of the land to achieve a development with a high level of amenity is consistent with good planning for this coastal settlement. The general thrust of this submission to enable the subject land as part of the



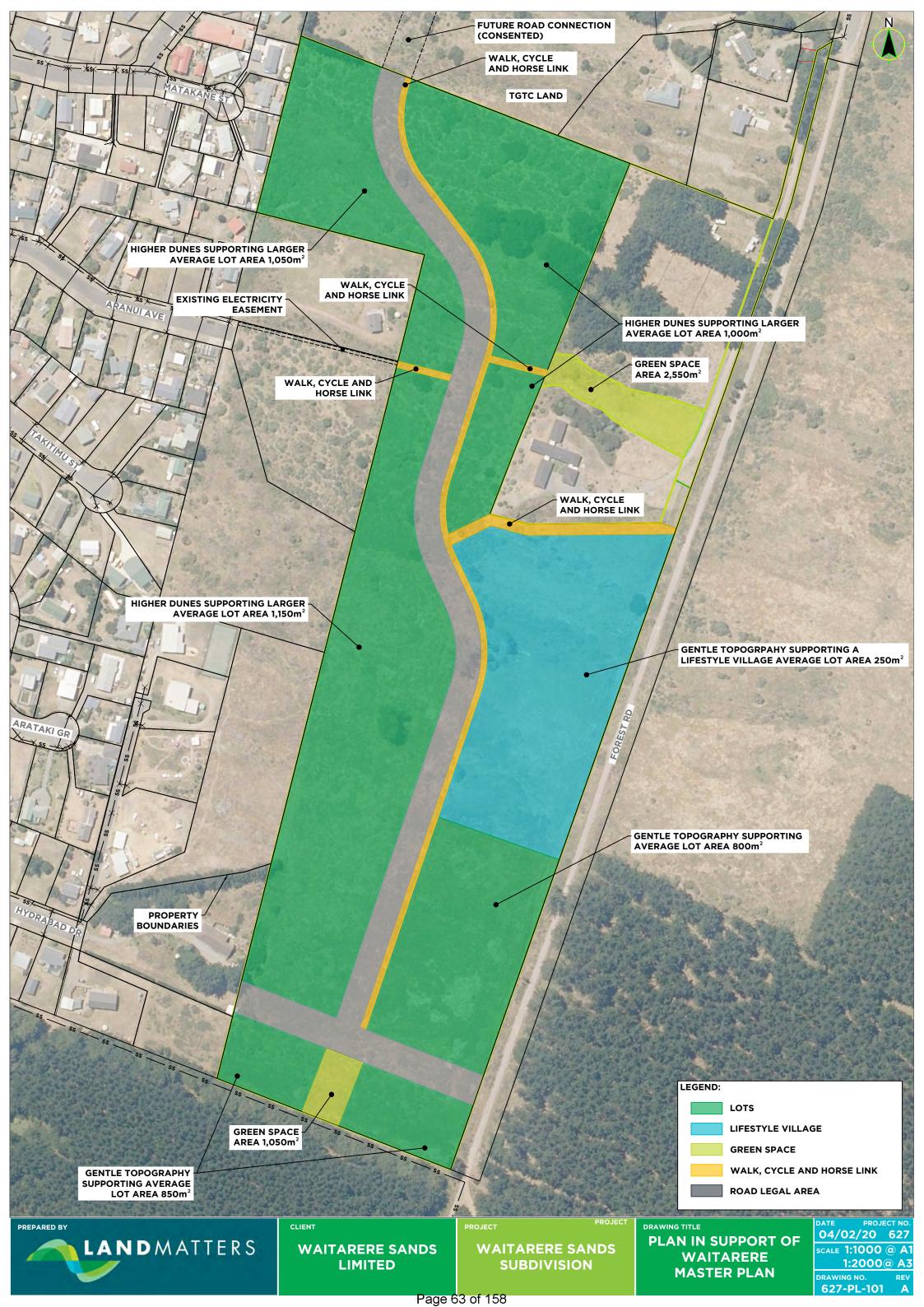
residential zone is supported by the following (also **attached**):

Appendix 1: WSL Structure Plan – Land Matters Limited

Appendix 2: Proposed Changes to the Master Plan (Submission Dated February 2020)



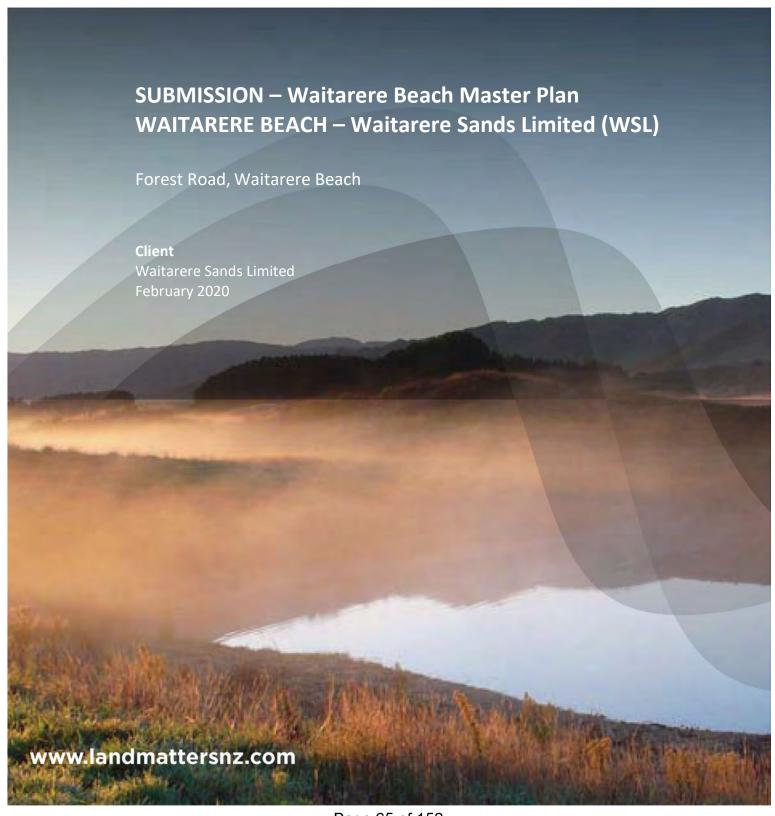
Appendix 1 – WSL Structure Plan





Appendix 2 – WSL Submission & Changes Sought to the Master Plan





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SUBMISSION FOR: Waitarere Sands Limited

Prepared by:

Bryce S Holmes

Principal Planner and Director

Date: February 2020

Version: FINAL Job Ref: J627

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1. BACKGROUND & INTRODUCTION

Horowhenua District Council (HDC) is reviewing development in the Waitarere Beach settlement for the next 15 years. The review includes a draft Master Plan that has been prepared by Council, McIndoe Urban and Local (Landscape Architects).

The review includes land owned by Waitarere Sands Limited (WSL) which is a large holding to the south west of Forest Road and east of the existing residential developments off Hydrabad Road and Aranui Avenue.

This document briefly describes the WSL land, the specific parts of the draft Master Plan that WSL wish to have amended, and gives reasons for the requested amendments.

2. THE LAND & SURROUNDS

The WSL land is located off Forest Road, Waitarere Beach. The property details are:

Address: Forest Road, Waitarere Beach

Area: 11.5488ha (Record of Title 872944) and 1.3386 (Record of Title 872943)

The WSL land has undulating topography with relatively small inland sand dunes and interdunal hollows between the dunes. The western part of the land is higher with dunes at approximately 10 - 15m above mean sea level (MSL). There is one lower part of the site next to Forest Road. Generally the slope of the land runs from north to south.

The soils are typically Aeolian sands from the Holocene period. Ground water is generally at 2m below the lowest part of the site.

Community infrastructure in the area consists of reticulated wastewater, road networks and open space (reserves). Although constrained, WSL have invested in services to the north along with its neighbour TGTC Limited. A road connection is being constructed to the north along with a wastewater network. There are currently capacity and performance issues for wastewater in Waitarere Beach although Council is investigating upgrades to alleviate potential issues. The WSL land could be a key consideration given the location of the main sewer line in the forest land just to the south of the subject holdings. Chorus have confirmed the telecommunication services can be reticulated into the site and Electra have suggested electricity is available (with appropriate upgrades and routing of high voltage lines).

It appears important tenure and consenting aspects of the land surrounding the WSL holdings have not been considered in the drafting of the master plan. That lack of consideration has provided a layout that will be difficult (practically impossible) to achieve. For example, the land at 22 Aranui Avenue has a subdivision consent layout that effectively severed any chance of a vehicular connection to and from the WSL land. The strip of land from the end of Forest Road to the Waitarere Forest is administered by Land Information New Zealand (LINZ) and is unlikely to be used for a main road connection in the near future.



3. DESIGN PHILOSOPHY, THE SUBMISSION, AND CHANGES SOUGHT

WSL have undertaken a detailed appraisal of the existing Waitarere settlement, current infrastructure, the features of the land, and detailed studies of the land. WSL have completed an engineering assessment of likely infrastructure needs in the area, review of appropriate connectivity to and through the land, an archaeological assessment, site soil testing, aerial photography and contour mapping, preliminary subdivision layout to provide for appropriate tenure for a comprehensive scheme plan for the land, an integrated traffic and transportation assessment for the entry to the land (TGTC Limited), and a preliminary planning analysis for the area.

From the outset WSL have insisted on a *design philosophy* that it wishes to implement for the land and these have been 'driven' by 3 main aspects:

- 1. The current pattern of development in Waitarere Beach maintenance of the existing character of the area; and
- 2. Creating a development for people not cars; and
- Corridors for community infrastructure, open space networks and community use of multiple modes of access.

The culmination of WSL's investigations of the land, and using its *design philosophy*, results in a spatial layout that is attached to this submission in **Appendix 1**. The key design elements are:

- a) A main road alignment that will meander through the land to calm traffic;
- b) Provision for a new wastewater route through the land to assist in alleviating existing network issues;
- c) Green space in appropriate areas for public amenity;
- d) Allowance for water holding facilities within the land for fire fighting purposes;
- e) Extensive walkways, cycleways and bridleways within the land and at least 6 external points of connection to surrounding areas;
- f) Residential areas with generous lot sizes consistent with the current Waitarere Beach community;
- g) An area set aside for a lifestyle village to allow for people looking to retire to the beach environment.

In our opinion the attached plans better reflect the current Waitarere Beach character and WSL seek that its framework is included in the master plan. The suggested changes will better achieve the design principles (reproduced below from page 1 of the draft master plan).

Design Principles:

Ecology and Sustainability

- 1. Apply principles of water sensitive urban design throughout the development.
- Open spaces will provide positive recreational and ecological outcomes for the neighbourhood and downstream environments.
- 3. Restore and protect ecological features with the area.

Culture and heritage

- 4. Respect and reflect the regions rich heritage including matters and sites of mana whenua significance.
- 5. Maintain important cultural and archaeological sites.

Quality

- 6. Develop Waitarere Beach to the highest standards, building upon the existing character and ensuring local community needs and aspirations are met.
- 7. Encourage a landscape-sensitive approach to housing within appropriate areas.

Capacity

8. Achieve the development capacity and patterns appropriate to Waitarere Beach.

Choice



9. Create a neighbourhood that offers variation and choice in housing types.

Affordability

- 10. Infrastructure and public open space is affordable and feasible.
- 11. A variety of housing is available at all budget levels.

Adaptability

- 12. Build flexibility into the design.
- 13. Consider expected impacts of climate change on designs.

Relationship with Waitarere Beach

- 14. Integrate with Waitarere Beach and adjacent rural residential areas.
- 15. Optimise connections to the beach and commercial centre.
- 16. Develop a logical and coherent interconnected network of streets and movement links.
- 17. Encourage people to walk or cycle.

Connections

- 18. Ensure good pedestrian and cycle access to public amenities shops, beaches, forests and lakes.
- 19. Create safe slow streets for people to live on and use.
- 20. Provide a movement network well integrated with the open space network.

Distinctive Identity

- 21. Ensure the area feels like "Waitarere Beach" and offers a clear sense of community and a safe environment.
- 22. Ensure development integrates and builds upon the strong coastal character of the area.

Relationship to wider landscape

23. Link to wider coastal landscape visually and ecologically.

Open Space provision & distribution

24. Provide a variety of open spaces to serve the new community.

Recreational amenity

- 25. Cater for diverse activities walking, cycling, dog walking, fishing.
- 26. Open space located to provide ecological benefits.
- 27. Provide amenities for both residents and visitors.
- 28. Provide for easy navigation and wayfinding.
- 29. Ensure public accessibility and safety.

The table below provides an analysis of the draft Master Plan as it relates to the WSL land and its surrounds. Where an issue has been identified, we have provided a solution for consideration and inclusion of the final Master Plan for Waitarere Beach.

Issue Number	Part of Master Plan	Issue/Commentary	WSL solution/Relief Sought
1	Pages 2, 3, 4, 6, 7	The extent and location of roading will likely result in all of the landform within the site being extensively modified to accommodate vertical and horizontal geometric standards – the <i>Urban Structure and Connection</i> descriptions are inconsistent with the <i>Landscape and Open Space Descriptions</i> (see page 3 of the document).	WSL seeks 'The Plan' is amended to reflect the layout attached to this submission.
2	Pages 2, 4, 6, 7	The roading pattern will be expensive to implement and the feasibility is questionable.	WSL seeks 'The Plan' is amended to reflect the layout attached to this submission.
3	Pages 2, 4, 6	The heavy reliance on Forest Road does not consider the potential tenure restrictions relating to that land.	WSL seeks further consideration of the Forest Road.



4	Pages 2, 4, 6	The layout will inhibit the ability to provide improvements in particularly wastewater reticulation through the land and at the expense of the current community.	WSL seeks 'The Plan' is amended to reflect the layout attached to this submission.
5	Pages 2, 4, 6	The lot layout and density appears to be more conducive to a built up environment (say Churton Park or similar) rather than a beach community on the coast;	WSL seeks 'The Plan' is amended to reflect the layout attached to this submission.
6	Page 7	The road cross sections are at odds with the agreed approach that has been consented for the joint TGTC/WSL road connection (Achillies Avenue extension).	WSL seeks an additional cross section is added to the Master Plan reflecting the already agreed approach.
7	Page 3	The Design Description for Residential Lot Layout implies only 'tweaking' of boundaries should occur as a result of implementing the Master Plan.	WSL seeks amendment to the design description to reflect the master plan is simply a guide for development in the area rather than dictating final subdivision layout.

Overall, WSL are concerned that its aspirations for the land have not been captured in the current version of the Master Plan and this is despite spending time (from March 2019 to present day) and effort communicating with Council (and its Consultants) in production of this document. WSL remain committed to achieving an outcome that builds on the current Waitarere Beach character and achieves a result that will benefit the current community.

WSL looks forward to further engagement with the Council on this matter.

LAND MATTERS LIMITED



Submission 12 – Director-General of Conservation





27 April 2021

Strategic Planning Horowhenua District Council Private Bag 4002 Levin 5540

Attention: David Clapperton, Chief Executive

Dear David,

Proposed Plan Change 5: Waitārere Beach Growth Area - Horowhenua District Council

Please find enclosed the submission by the Director-General of Conservation in respect of Plan Change 5. The submission generally supports the intent of Plan Change 5 to manage a planned growth area. The submission identifies the Director-General's concerns, which is relatively specific to the Wairarawa Lagoon.

It is noted that, the Wairarawa Lagoon is of high cultural significance to whānau, hap $\underline{\bar{u}}$ and iwi. Plan Change 5 does not appear to clearly demonstrate how it will recognise and provide for cultural associations, have particular regard to their respective kaitiaki roles or account for the Treaty principles, noting that whaanau, hapuu and iwi are best placed to speak to these matters.

Please contact Stephanie McNicholl in the first instance if you wish to discuss any of the matters raised in this submission (by phone 0272461491 or email: smcnicholll@doc.govt.nz).

Yours sincerely

MARIL

Moana Smith-Dunlop

Operations Manager

Manawatu

Department of Conservation Te Papa Atawhai

Hamilton Shared Services
Private Bag 3072, Hamilton Mail Centre, Hamilton 3240, New Zealand
www.doc.govt.nz

RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON A CHANGE TO THE HOROWHENUA DISTRICT PLAN

TO: Horowhenua District Council

SUBMISSION ON: Proposed Plan Change 5 – Waitārere Beach Growth Area (**Plan**

Change 5)

NAME: Lou Sanson

Director-General of Conservation (Director-General)

ADDRESS: RMA Shared Services

Department of Conservation

Private Bag 3072 Hamilton 3240

Attn: Stephanie McNicholl

STATEMENT OF SUBMISSION BY THE DIRECTOR-GENERAL OF THE DEPARTMENT OF CONSERVATION

Pursuant to clause 6 of the First Schedule of the Resource Management Act 1991 (RMA), I, Moana Smith-Dunlop, Operations Manager, Manawatu, acting upon delegation from the Director-General, make the following submission in respect of the Plan Change 5 to the Horowhenua District Plan 2015 (Operative Plan).

- 1. This is a submission on the Plan Change 5 to the Operative Plan.
- 2. The specific provisions of Plan Change 5 that my submission relates to are set out in Attachment 1 to this submission. The decisions sought in this submission are required to ensure that Plan Change 5:
 - a. Gives effect to the New Zealand Coastal Policy Statement 2010.
 - b. Is consistent with the National Policy Statement for Freshwater Management 2020 (NPSFM).
 - c. Recognises and provides for the matters of national importance listed in section 6 RMA, has particular regard to the other matters in section 7 and appropriately accounts for Te Tiriti o Waitangi principles, per section 8 RMA.
 - d. Promotes the sustainable management of natural and physical resources.
 - e. The changes sought are necessary, appropriate and sound resource management practice.
- 4. I **seek** the following decision from the Council:
 - a. That the amendments, additions and deletions to Plan Change 5 sought in Attachment 1 are made.
 - b. That effect be given to the New Zealand Coastal Policy Statement and appropriate consideration be given to the implementation of managed retreat.
 - c. That consistency with the NPSFM is achieved NPSFM provisions of particular relevance include:

- i. Subpart 1.3 requires that the health and well-being of waterbodies and ecosystems is prioritised in accordance with Te Mana o Te Wai;
- Subpart 2.2, Policy 3 requires that 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;
- iii. Subpart 2.2, Policy 8 requires that the significant values of outstanding water bodies are protected;
- iv. Subpart 3.24 requires avoidance of the loss of natural inland wetland extent.
- d. The status of Wairarawa Lagoon in particular, be clarified as it is identifiable as an integrated water body within the catchment.
- e. Further or alternative relief to like effect, to that sought above.
- 5. I wish to be heard in support of my submission and if others make a similar submission, I will consider presenting a joint case with them at the hearing.

Moana Smith-Dunlop
Operations Manager (Manawatu)

Pursuant to delegated authority
On behalf of
Lou Sanson
Director-General of Conservation

Date: 27 April 2021

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011.

ATTACHMENT 1:

PLAN CHANGE 5 – HOROWHENUA DISTRICT PLAN SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION

The specific provisions that my submission relates to are set out in Attachment 1. My submissions are set out immediately following these headings, together with the reason and the decision I seek from the Horowhenua District Council.

The decision that has been requested may suggest new or revised wording for identified sections of Plan Change 5. This wording is intended to be helpful but alternative wording of like effect may be equally acceptable. Text quoted from Plan Change 5 and the Operative Plan is shown in *Italics*. The wording of decisions sought shows new text as <u>underlined</u> and original text to be deleted as <u>strikethrough</u>.

Unless specified in each submission point my reasons for supporting are that the policies are consistent with the purposes and principles of the RMA.

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
Chapter 6 – Urban Envi	ronment	,	
6.3.30A	New policy	Plan Change 5 and associated reports as notified, fails to adequately identify and address the environmental and cultural values of Wairarawa Lagoon or any other ecological features in the area. — in part because_the Section 32 report and Plan Change 5 is not supported by an ecological assessment. The NPSFM has not been considered or assessed in the Section 32 report and does not appear to have been factored in to Plan Change 5.	That the integrity of Wairarawa Lagoon biodiversity site on Lot 1 DP 424782 is protected, maintained and enhanced as a natural habitat and is not used as a stormwater mitigation measure of any development. Insert the following or words to the like effect: • Maintains important cultural and archaeological sites, including sites of significance to mana whenua such as Wairarawa Lagoon. • Protects and restores ecological features within the area, including naturalisation of the Wairarawa Stream and the Wairarawa Lagoon water body and other water bodies.
Planning Maps			
Section 32 Report forPC5 Pg 36	Planning Map 4, 17, 19 & 20	Oppose in part The plan change identifies Lot 1 DP424782 as having a current zoning of Greenbelt Residential.	That the references and mapping rezoning Lot 1 DP424782 Wairarawa Lagoon to Open Space correlate.

PC REF	PLAN PROVISION	Position and Reason	RELIEF SOUGHT
Zone / General		The listed table does not appear to correlate with the mapping for Wairarawa Lagoon area to be rezoned to Open Space.	
Open Space Zone		Oppose in part. The Wairarawa Lagoon contains significant vegetation and / or habitats. One Plan provisions require that such habitat is recognised, protected and enhanced. The Director-General is concerned that Plan Change 5 does not implement the associated One Plan provisions, in particular, Plan Change 5 does not appear to: • recognise the biological significance of Wairarawa Lagoon; • provide for appropriate management of the Wairarawa Lagoon.	 Amend Plan Change 5: maps to identify that Wairarawa Lagoon is a significant natural area; and to identify whether Wairarawa is a lagoon or wetland; and to align Wairarawa with the provisions of Chapter 3 Natural Features and Values rather than Chapter 4 Open Space and Access to Water Bodies, in order to protect its values and extent (Subpart 3.22 NPSFM)



Submission 13 - Forest & Bird



Submission on Proposed Plan Change 5: Waitarere Beach Growth Area

Horowhenua District Plan (2015), Resource Management Act 1991

27 April 2021

To: Strategic Planning, Horowhenua District Council

districtplan@horowhenua.govt.nz

From: Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)

205 Victoria Street, Wellington 6011

Contact for service: Amelia Geary – Regional Conservation Manager

a.geary@forestandbird.org.nz

Forest & Bird could not gain an advantage in trade competition through this submission.

If others make a similar submission, Forest & Bird will consider presenting a joint case with them at the hearing.

INTRODUCTION

- 1. Forest & Bird is New Zealand's largest non-governmental conservation organisation. Forest & Bird's mission is to protect New Zealand's unique flora and fauna and its habitat. Key matters of concern therefore relate to the protection of ecological values, particularly the sustainable management of New Zealand's indigenous biodiversity, natural landscapes, coastal environment and freshwater resources including wetlands, rivers, and lakes.
- 2. Forest & Bird has a long history of conservation action in Horowhenua. For example, we were instrumental in getting the Manawatū Estuary at Foxton its recognition as a wetland of international importance. Horowhenua Branch of Forest & Bird maintains an active nursery and is engaged with the Department of Conservation in the revegetation and restoration of Papaitonga Scenic Reserve near Levin. The Branch is also actively engaged with pest control and the protection of Prouse Bush, a Horowhenua District Council reserve.
- 3. Forest & Bird is opposed to Plan Change 5 (PC5) as currently proposed. We consider that the plan change is completely inappropriate for the site in question. This site contains important

- ecological, natural character, feature and landscape values that would be lost, modified and degraded by the development proposed under the rezoning and structure plans in PC5.
- 4. Forest & Bird wishes to be heard in support of this submission.

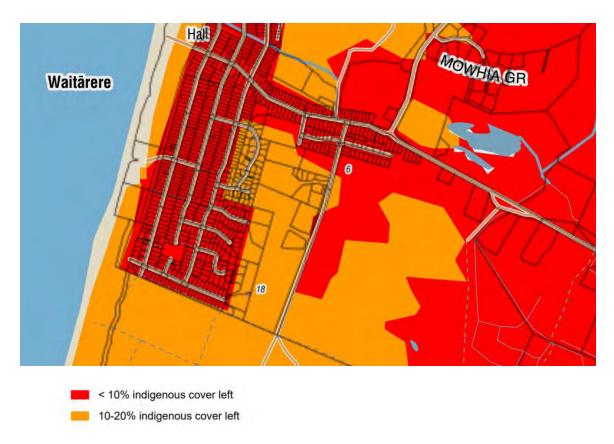
SUBMISSION – reasons and relief sought

Ecological and natural values

- 5. As stated above, Forest & Bird considers that PC5, as proposed, is inappropriate for this site given the important ecological, natural character, feature and landscape values that would be lost, modified and degraded by the development proposed and enabled through the plan change.
- 6. Forest & Bird recognises that the function for maintenance of indigenous biodiversity sits with Horizons Regional Council rather than Horowhenua District Council (the Council).
- 7. However, this does not remove the Council's responsibilities to protect matters of national importance in s6(c) of the RMA when carrying out its functions under s31. This includes its functions for providing sufficient development capacity in respect of housing and business land and the control of any actual or potential effects of the use, development, or protection of land. Nor should the Council promote development and land use activities which would be contrary to regional plan provisions to maintain indigenous biodiversity as this is contrary to integrated management and would create false expectations.
- 8. There is very little consideration of adverse effects on natural environmental values in the Section 32 Report (s32 Report) for Proposed Plan Change 5. In fact, the only ecological and natural character, feature and landscape values that have been recognised in the s32 Report appear limited to:
 - a. A general recognition that the site is within the wider coastal environment and within the sand dune systems of Waitārere, Motuiti and Foxton.
 - b. Access, enhancement, cultural values of (and potential for adverse effects of development on) the Wairarawa stream and lagoon (the later being referred to as The Lakes in PC5). The s32 report records that the waterbodies are of importance to Ngāti Huia and that the Wairarawa Lagoon is identified as a threatened habitat under Schedule F of the One Plan.
- 9. While there are specific provisions in proposed PC5 relating to these values, the basis for the provisions has not been established in the s32. In fact, the provisions which would provide for the values above are subject to provision for development set out in the structure plans. This lack of s32 assessment means that the cost, benefits efficiency and effectiveness within the s32 Report which focuses on housing, development and infrastructure, is incomplete. The s32 report fails to consider the ecological values of these environments and waterbodies that may be adversely affected (i.e. as environmental costs) by the proposed land use change under PC5. These adverse effects are likely to be significant and warrant an adequate assessment.
- 10. It is particularly concerning to find that the s32 report consideration is that s6(c) of the RMA is not relevant. The presence of threatened species clearly triggers s6(c) protection (see Table 1. further on).

- 11. Forest & Bird considers that ecological surveys and assessment (and potentially geological also) are required given that:
 - a. The site is it is on an ancient dune system that dates back to the Holocene¹;
 - b. The west east alignment of the sand dunes being perpendicular to the coast is an uncommon formation.
 - c. The likely presence of diverse habitat present in stable sand dune systems of Waitārere, Motuiti and Foxton given their exposed slopes and more sheltered often damp interdune hollows;
 - d. The presence of scrub visible from the beach road suggests that at-risk habitat is present, the inactive and inland dune systems may also be considered "rare" under Schedule F of One Plan.
 - e. There has been significant loss of indigenous vegetation over this area. The site is identified under the Threatened Land Environment classification with approximately 50% of the site as less than 10% indigenous cover left and the remaining 50% as only 10-20% indigenous cover left (Image 1.). Any remaining indigenous vegetation is important and more than likely to be significant as it is the only representative cover remaining.

Image 1: Threatened Land Environment classification of the proposed Waitārere Beach growth area.



¹ Shepherd, M.J. 1985. The origin of the Koputaroa dunes, Horowhenua, New Zealand. New Zealand Journal of Geology and Geophysics 28: 323-327.

https://www.tandfonline.com/doi/pdf/10.1080/00288306.1985.10422230

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- © Landcare Research NZ Limited 2009-2021. CC BY 3.0 NZ License.
- 12. There may be other ecological values that are significant, which we anticipate is the case given those identified above, however without an ecological survey and assessment of the site this cannot be confirmed.
- 13. Forest & Bird is therefore shocked to discover that no ecological assessment has been done for the site. An assessment must be undertaken before this plan change can legitimately proceed. For example, the dunescape along Forest Road clearly meets the Schedule F criteria in the One Plan as stable duneland. In the absence of an ecological assessment to determine the significance of the habitat in question, a scan of a publically available database quickly identified at least three threatened species present within the proposed Waitārere Beach growth area (Table 1.). The proposed growth area is located within the wider coastal area, contains dune landscapes and is home to several threatened species. It is unacceptable of the Council to consider proceeding with rezoning for any residential purposes until all the ecological and natural character feature and landscape values of the site have been assessed.

Table 1: Threatened species known to live within the proposed Waitārere Beach growth area.*			
Species present	Туре	Threat classification ²	
Katipō Latrodectus katipo	Invertebrate	At risk – declining	
Autetaranga Pimelea villosa	Vascular plant	At risk – declining	
Juncus caespiticius	Vascular plant	At risk – declining	

^{*}Note: this list is not finite. Data extracted from https://inaturalist.nz/home

- 14. Forest & Bird is similarly concerned that Council considers it appropriate to notify a plan change in such a sensitive coastal environment when it has failed to undertake basic surveys of fauna such as birds and lizards. Threatened wetland birds like Australasian bittern (*Botaurus poiciloptilus*) may well use Wairarawa lagoon and there will almost certainly be grass skinks (*Oligosoma polychroma*) across the dune environment. Glossy brown skinks (*O. zelandicum*) and copper skinks (*O. aenaeum*) are also possibly present. Comprehensive faunal as well as botanical surveys are required.
- 15. Wairarawa Lagoon is a Schedule F wetland in the One Plan and also triggers policies in the NPS-FM. The s32 report states:

The Lagoon is proposed to be zoned as Open Space and will be retained as a public open space. This will support the retention and enhancement of the biodiversity of the site. It will also enhance public access to the site.

16. However, again, in the absence of any comprehensive ecological assessment, we have no way of being convinced that the proposed open space zone is in any way big enough to protect Te Mana o te Wai and the biodiversity values of the site, or that the development of houses won't have a detrimental impact in terms of runoff, from people bringing their cats and dogs and the suite of pests associated with humans such as rats and mice. Nor is it certain that the retention

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² Source: https://nztcs.org.nz/home

of the site under opens space zoning and the PC5 provisions will in any way lead to its enhancement as there is no mention of any management plan specifically targeted at restoring this lagoon and its biodiversity values. Nor does opens space zoning put nature at the forefront of decision making for the zone. We therefore request an ecological assessment of Wairarawa Lagoon and a management plan for restoration of the lagoon before this plan change is to proceed any further. Once that information has been considered a "natural open space" zoning may be more appropriate. In Forest & Birds view s6(c) is relevant to the proposal and must be considered. Reference back to Part 2 of the Act is required as the Plan Change cannot rely on the RPS which does not specifically address these matters and responsibilities in relation to the district council's functions.

17. PC5 does not give enough certainty of protection and maintenance of indigenous vegetation, habitats, biodiversity, waterbodies, natural character and sites of ecological value across the proposed Waitārere Beach growth area. The plan change prioritises the use of the NPS-UD but completely fails to give effect to the NPS-FM, or consider the implications in terms of the NES for Freshwater and of the upcoming NPS-IB to be gazetted this year. In addition, the potential for loss of significant indigenous vegetation and habitats as a result of the plan change ignores the Council's responsibilities under s6(c) of the RMA. The provisions need to be significantly amended to ensure that the natural values of the site will actually be protected and to ensure consistency with the One Plan. We acknowledge the policy direction in the NPS-UD to provide for urban development; however, this is not to be provided at any cost.

Coastal environment

- 18. Forest & Bird considers that a reassessment of the extent of the coastal environment in this area needs to be undertaken as part of the assessment of effects for this plan change given its location near the coast and prominence of sand dunes and coastal vegetation on the site. The coastal features of this area extend further inland. Greater recognition of the coastal environment extent inland has been identified in the district plan at Hōkio, it is not clear why this has not also been identified at Waitārere.
- 19. The Horizon's One Plan recognises natural character dunes as a characteristic of natural character in the coastal environment under Policy 6-9 and sets out considerations for activities in such environments. Forest & Bird considers that the proposal for PC5 explained in the s32 Report and set out on the Structure Plans is not consistent with this policy as it:
 - a. is not an appropriate form, scale and design to be compatible with the existing landforms, geological features and vegetation,
 - b. will not, by itself or in combination with effects of other activities, significantly disrupt natural processes or existing ecosystems, and
 - c. will not provide adequately for the restoration and rehabilitation of natural character where that is appropriate and practicable.
- 20. There is no functional need for this subdivision development to be located in or near the coastal environment. In addition, and irrespective of functional need, Forest & Bird considers that there are reasonably practical alternatives, including much lower levels of development at Waitārere and providing for urban development closer to Levin.

Climate change

- 21. Forest & Bird is concerned further development at Waitārere will increases use of and reliance on private motor vehicles. This fails to reduce carbon emissions or provide efficient and effective energy use solutions for transport.
- 22. The economic viability and demand for development at Waitārere is questionable based on past rates for residential development, the low percentage of permanent residence and the travel distance to likely work places.
- 23. A focus on development and urban revitalisation within existing residential areas near the main town centre of Levin would seem a better community and environmental approach for Horowhenua. Rather than further development of the coastal environment and inland dune systems at Waitārere that would not provide reduced travel requirements and therefore will contribute to carbon emissions and climate change.

Provisions in PC5

- 24. Forest & Bird would support some of the policy wording, however we consider that the wording which would make provision for ecological values will have limited impact given that they can only be considered to the extent that they are in accordance with the Structure Plans. Given the complete absence of any ecological or geophysical assessment, it is clear the Structure Plans as proposed, have not been developed within the ecological and geomorphological constraints of the Waitārere Beach growth area.
- 25. For example, proposed Policy 6.3.30A includes (among others) the following appropriate considerations:
 - Responds to significant landforms, including avoidance of residential development on the culturally important Otororoa Ridge.
 - Maintains and aligns with the area's distinctive natural dune landforms.
 - Provides visual and ecological links to the wider coastal landscape.
 - Protects and restores ecological features within the area, including naturalisation of Wairarawa Stream and related watercourses in the Lakes area.
- 26. However, the development proposed as shown on Structure Plan 07A is contrary to this. In particular, the housing within the open space zone near the lake and streams does not protect or restore ecological features. The residential zoning and density within the sand dunes does not maintain the distinctive dune landforms or protect the ecological values within them. The policy outcomes of the plan change are not possible under the development shown on the Structure Plans.
- 27. It is inappropriate to allow development on or in the dunes when considering the relationship with Otororoa Ridge. These sand dunes to the south of Beach road provide the last line of connectivity with Otororoa Ridge, as other sand dunes in the area have been significantly modified and reduced by agriculture and forestry. Development of the scale proposed in PC5 will result in the loss of this connectivity and any chance to enhance that connectivity to the coast would be gone.
- 28. There needs to be clear direction in this plan change to ensure any subdivision is located and designed to achieve protection of the natural features and ecological values of the site. This

may include constraints on building sites and land use. It is impractical and unlikely to achieve protection where these features and ecological values fall within private subdivision, even on the low density and larger lot subdivision. We therefore request the inclusion of reserve areas running west to east to preserve the distinctive landforms and ensure their enduring ecological connectivity with the wider coastal environment. This should be a natural open-space zone within which features and values are to be protected.

- 29. While it is preferable to separate all areas with distinctive features and ecological values from residential zoning and proposed subdivision, where there is any inclusion of such areas within private property they should be zoned as natural open space to recognise the values within them and manage land use activities accordingly.
- 30. Provision for smaller residential lots on the basis of land being flat fails to consider ecological values. Again, this plan change needs to be reconsidered once comprehensive ecological surveys have been undertaken.
- 31. Forest & Bird opposes subdivision within Structure Plan 07A being a controlled activity. This would mean consent applications could not be declined on the basis of adverse ecological effects. This plan change needs to be directive to give certainty of constraints when applying for consent to subdivide. Similarly, there should be notification where adverse effects are more than minor.
- 32. Forest & Bird also considers that the policy direction is inadequate as remnant indigenous vegetation and the habitat of indigenous species cannot be protected on the scale of subdivision enabled. This is because landowners will expect to develop the land on their sites, establish fences and include various hard surface areas. This will result in a loss of indigenous biodiversity and create significant ecological disconnection for any remaining vegetation and habitats. Furthermore, it will destroy the ecological connectivity between the culturally significant Otororoa Ridge, the stable dunes within the growth area, the coastal environment and disrupts the connection between the river margin and the lakes.
- 33. Forest & Bird seeks clarity regarding the proposed ownership of the land to be rezoned Open Space. Forest & Bird considers it inappropriate to have Wairarawa Lagoon and associated open space zone to carved up into separate titles under private ownership. We acknowledge some prospective landowners will be very solicitous of their properties but others will not. Fragmentation by subdivision/ownership will mean that protection of ecological values will become complex and difficult to attain. Sites of ecological significance should be kept as whole titles, and transferred to Council ownership to enable access for the enjoyment of everyone. Covenants, reserve status or similar should be explored to protect the areas in perpetuity.
- 34. In addition, a "natural open space" zone would be more appropriate for areas with important and significant ecological values, as this puts the natural environmental considerations above recreation or other uses.
- 35. The only proposed infrastructure for stormwater control is for paved streets via the existing stormwater facility which discharges directly into the sea. This is 1950s thinking. There have been ongoing issues with the existing system with both capacity and operation due to the accreting coastline. Rule 15.7.5(b) is ambiguous. There needs to be a requirement for all properties to achieve hydraulic neutrality, as is the case in Kāpiti District and any stormwater off

- paved roads must enter wetlands to catch contaminants, slow the flow and prevent flooding of the Wairarawa stream.
- 36. There also needs to be binding requirements in PC5 for substantial setbacks from all sites of significance, including Wairarawa Lagoon and stream and the Schedule F stable duneland along Forest Road. Setbacks must be planted and managed, not just left in rank grass and weeds which will suppress regeneration. Setbacks need to be set with effects on vegetation in mind e.g. edge effects from weeds, but also in terms of the erodibility and drought prone nature of dunes in a harsh coastal environment.
- 37. Forest & Bird would expect to see an integrated pest management plan to be adopted and implemented permanently across the site, including a requirement for the proposed growth area to be cat-free like other new developments across New Zealand³⁴, the condition will need to be registered on the title of every property. This would not only contribute to the protection of the significant ecological values, it would also contribute to New Zealand's goal to be predator free by 2050.⁵ This would need legal arrangements around it to ensure it continued in perpetuity.
- 38. Specific submissions in addition to our submissions above are included in the following table:

-

 $^{^3\} https://www.stuff.co.nz/dominion-post/news/82242645/kapiti-subdivision-imposes-a-nocats-covenant-to-protect-wildlife$

⁴ https://www.nzherald.co.nz/waikato-news/news/cat-ban-in-place-to-protect-bats-in-hamiltons-newest-suburb/ZGX254R7HSRBWUGEYWKLBHT3LQ/

⁵ https://www.beehive.govt.nz/release/one-step-closer-predator-free-2050

Note: This table is not exhaustive – changes to the specific provisions are also required to respond to the submission topics discussed above.

The specific provisions of the Plan Change that my submission relates to are as follows:	My submission is that: Clearly state whether you support or oppose specific parts of the Proposed Plan Change, giving reasons for your views	We seek the following decision from Horowhenua District Council: Please give precise details
All policies	Oppose for the reasons set out above on indigenous biodiversity and the coastal environments and because the policies don't meet the requirements of the RPS or achieve the purpose of the RMA. Terminology such as "Maintain and align" is uncertain in terms of protecting the ecological values associated with natural dune formations. The term align is also subjective and detracts from the policy. Also, the term "responds to" in Policy 6.3.30A is uncertain and does not ensure the protection of such landforms and features. It is unclear what "significant landforms" is intended to capture beyond the already specified Otororoa Ridge.	We seek that all the provisions in this plan change be rewritten to address our concerns.
Rules in PC5	Oppose all rules that are permitted, controlled or restricted discretionary. We oppose the rules that are currently classed as permitted or controlled because they could not be declined even if there were significant adverse effects. The conditions proposed are inadequate for the protection and maintenance of indigenous biodiversity and for the coastal environment. The assessment criteria, matters for control and discretion are inadequate to address Forest & Bird's concerns for indigenous biodiversity and the coastal environment set out above this table.	Delete all rules and amendments to rules that are lower than a Non-complying activity.

	The rules do not give effect to the RPS or achieve the purpose of the Act.	
Structure Plan 07A	Oppose for the reasons set out in our submissions above. In addition - the structure plans would result in the loss of indigenous biodiversity and natural values, including sand dunes Neither these plans nor the rules give effect to the RPS or achieve the purpose of the Act.	 We seek all Structure Plans associated with this plan change be withdrawn. Alternatively, significant amendments are required to: Reduce the level and areas of development; Identify natural sand dune areas to the south of Waitārere Beach Rd that are to be protected, i.e. through scenic reserve status; and by amended to areas identified for development or infrastructure as indicative until an ecological assessment has been undertaken to ensure the Structure Plan is appropriate according to the ecological constraints of the site.

39. Forest & Bird also seeks all consequential changes necessary to address this submission.

Conclusions

- 40. While Forest & Bird would generally support the focusing new development around areas of existing development rather than ad-hoc and disparate subdivision, it does not support this development as proposed.
- 41. The justification for this development in terms of ecological and natural features effects seems to be that it is anticipated and consistent with other such development. This fails to recognise increasing impacts from cumulative development and disregards any site specific ecological values in favour of further development. Capacity calculations have not taken into account of ecological constraints and cannot be used to override Council's responsibilities under the RMA.

Relief sought: we seek that Plan Change 5 be withdrawn.



Submission 14 – FRP Investments Limited and FRP Agriculture Limited (FRP)

BEFORE THE HOROWHENUA DISTRICT COUNCIL

Under

the Resource Management Act 1991

In the matter of

Proposed Plan Change 5: Waitārere Beach Growth Area

FRP INVESTMENTS LIMITED AND FRP AGRICULTURE

LIMITED

Submitter

Submission on Horowhenua District Council Plan Change 5 Waitārere Beach Growth Area

Dated 27 April 2021

To: Horowhenua District Council
Private Bag 4002
Levin 5540

- Name of submitter: FRP Investments Limited and FRP Agriculture Limited and Heritage Estates (2000) Limited ("FRP") collectively referred to hereafter as FRP.
- 2. FRP, the submitter, is not a trade competitor.
- 3. Horowhenua District Council ("Council") notified Plan Change 5: Waitārere Beach Growth Area ("PC5") on the 19th March 2021 and submissions close at 4pm on Tuesday, 27 April 2021. The PC5 materials notified via the Councils website at the 'Have Your Say' link¹ are recorded in the printout at Appendix 1 to this submission as a printout of the Councils notification Webpage.² On that page under the heading of 'Proposed Plan Change Documents' the following documents are included:
 - (a) Proposed Plan Change 5: Waitārere Beach Growth Area Section 32 Report
 - (b) Proposed Plan Change 5: Waitārere Beach Growth Area Section 32 Report Appendices - Part 1 (Appendix 1 to 3)
 - (c) Proposed Plan Change 5: Waitārere Beach Growth Area Section 32

 Report Appendices Part 2 (Appendix 4 to 8)
 - (d) Proposed Plan Change 5: Waitārere Beach Growth Area Zoning Map
 - (e) Proposed Plan Change 5: Waitarere Beach Structure Plan

Based on the Councils 'Have your say' website the submitter understands 2

(a) to (e) are the notified documents in their entirety.

¹ https://www.horowhenua.govt.nz/Council/Have-Your-Say/Proposed-Plan-Change-5-Waitarere-Beach-Growth-Area

² With information not applicable to Proposed Plan Change 5 redacted on the Appendix 2 print attached.

- FRP advise that they were not directly notified of PC5 and are directly affected by proposed PC5.
- 5. The Councils PC webpage at notification has a link to an online submission form and a pdf version of a submission form, named: Submission Form -Proposed Plan Change 5: Waitārere Beach Growth Area (Print version). Under a heading of 'Related Information' there is a further link to Public Notice -Plan Change for Waitarere Beach Growth https://www.horowhenua.govt.nz/News-Notices/Public-Notices/Proposed-Plan-Change-for-Wait%C4%81rere-Beach-Growth-Area and the Submitter provides a pdf print of the information at that website link at Appendix 2 to this submission. In addition, the 'Related Information' records a 14MB file titled Waitarere Beach Master Plan with a download link of https://www.horowhenua.govt.nz/file/assets/public/master-plans/hdcwaitarere-beach-master-plan-march-2021.pdf (also included in at Appendix 2 of the Section 32 Evaluation report notified).
- 6. FRP's considers the notified information included on Council's website links

 Appendix 1 and Appendix 2 presents different summary information to the public at the time of notification (19 March 2021) of PC5. The Appendix 2 information states the proposed changes "Minor updates to the issue discussion to reflect the adoption of the Horowhenua Growth Strategy 2040" and the information in Appendix 1 in the 'Have Your Say' (the Notification Documents website page) does not.

Robust, sustainable management of natural and physical resources requires notification of the s 32 analysis of the comparative merits of a proposed plan change to persons directly affected by those proposals.³

 In the s32, at 4.5 Supporting information (page 25) the following documents are listed as having been considered when drafting the s32.

³ [2013] NZHC1290 PNCC v Motor Machinist Limited, at paragraph [91] (c) applies equally at notification for submissions as it does for further submissions.

(a) Waitārere Beach Master Plan (s32 Appendix 2 with the same name)

(b) Waitārere Beach Community Plan

(c) Archaeology Scoping Report & Addendum (the s32 Appendix 4 report has a different reference of Waitārere Beach Archaeology Scoping Report & Addendum and includes a report titled "Waitārere Beach Master Plan: An Overveiw of Archaelogical Risk")

(d) Horowhenua Growth Strategy 2040

- (e) Waitārere Beach Commercial Land Assessment (s32 Appendix 5 with the same name, the report by Urbacity is dated August 2020)
- (f) Liquefaction Assessment (s32 Appendix 6 pages 18-20, 38-43 and a further 2 pages of maps of Waitārere Beach, these appear to be parts only of the *Tonkin & Taylor Limited Horowhenua District Potential Growth Areas Liquefaction Assessment Horowhenua District Council, September 2020 Job Number: 1009677.v2*)
- (g) Stormwater Catchment Assessment Summary (s32 Appendix 8, the appendix has the same name and includes Good Earth Matters information totals 6 pages)

(h) Horowhenua Long Term Plan 2018-2038

- (i) Horowhenua Socio-Economic Projections: Update May 2020 (s32 Appendix 7 includes a report with the title of "Horowhenua Socio-Economic projections -Summary and methods Projections" update report, May 2020 with a different name)
- (j) 3 Waters Infrastructure Master Plan: Waitārere Beach area (s32 Appendix 3 with the same name)

Documents in bold text at 6 (b), 6 (d) and 6(h) are not part of the notified documents for PC5.

- 8. The document listed at 6 (h), the "Horowhenua Growth Strategy 2040" was located by the submitter via an online search of the world wide web. The document that references other documents including:
 - i. Sense Partners Horowhenua Socio-EconomicProjections July 2017
 - ii. Spatial Strategy (no providence provided)

These documents are not notified.

- 9. FRP notes that the Horowhenua District Councils 'Have your say' website was updated to include an additional document "hdc-proposed-plan-change-5-waitarere-beach-plan-change-5-summary-of-information.pdf" after the 23rd March 2021 and before the 27th April 2021, a print off of the Councils website notification page and a screenshot from the 27th April 2021 with the change highlighted is included at **Appendix 3**.
- 10. FRP notes that the s32 Appendix 6 provides part of the Tonkin Taylor report not the full report and submits that the submitter should receive the full report to enable assessment of the issues. The parts of the report provided are considered inadequate both for the assessment of the effects at the time of this submission and for reliance for s32.
- 11. FRP advise that they were not directly notified of PC5 and are directly affected by proposed PC5.
- 12. FRP owns land north of Palmer Road at Foxton Beach. The land is described as Lot 1 DP 77109 and is a 110 hectare area. The land is accessed from Palmer Road and adjoins the northern boundary of Foxton Beach Township. That land is subject to an Environment Court Consent Order dated the 14th of March 2013⁴. The Consent Order is generally translated into the Operative District Plan as:

⁴ Env2010-WLG-000032 FRP Investments Limited & FRP Agriculture Limited v Horowhenua District Council

6

(a) The Greenbelt Residential (Foxton Beach North Overlay) Zone and

Greenbelt Residential Deferred (Foxton Beach North Overlay) Zone,

and

(b) Chapter 7, see Policy 7.1.4, Policy 7.1.13 (and others), and

(c) Planning Map 12, and

(d) Schedule 14: Greenbelt Residential (Foxton Beach North Overlay)

Zone.

The FRP land is within the Greenbelt Residential Zone of the district plan, and

as such, it is directly subject to the PC5 proposed text amendments to Section

6 of the plan because the proposed wording of PC5 affects all Greenbelt

Residential (including Greenbelt Residential (Foxton Beach North Overlay)

Zone) and is therefore within the scope of PC5⁵. Specifically, FRP **opposes**

proposed changes to the text at:

6.1.1 Chapter 6: Urban Environment

6.1.1.1 Issue Discussion

Why does FRP oppose the proposed text changes to Section 6 of the plan?

13. The Horowhenua Growth Strategy 2040 relies on growth projections

prepared by Sense Partners which were adopted by Council in July 2017⁶ and

states⁷ that the Horowhenua Growth Strategy 2040 responds to the intent of

the National Policy Statement on Urban Development Capacity (2016) and

other higher order planning documents that the Council must give effect to.

The PC5 s32 report notified accurately records that the NPS-UDC (2016) has

been replaced by the National Policy Statement on Urban Development 2020⁸

(NPS-UD 2020) which took effect on 20 August 2020, the Horowhenua Council

⁵ [2013] NZHC1290 PNCC v Motor Machinist Limited; [2014] NZRMA 519

⁶ Horowhenua Growth Strategy 2040 page 4.

⁷ Horowhenua Growth Strategy 2040 page 7

8 Issued under section 52(2) of the RMA1991

is not identified as Tier 1 or 2 in the NPS-UD but the Council must give effect to the NPS-UD2020.

- 14. The Horowhenua Growth Strategy 2040 is prepared as a non-statutory document under the Local Government Act 2002 ("LGA"), although the latter is not stated in the document, and has been adopted by the Council, however the strategy lacks review provisions and has not been updated against the Councils quarterly monitoring records. When viewed against the quarterly reports there are self-evident discrepancies that are not analysed in the s32 report for PC5.
- 15. FRP's considers the Horowhenua Growth Strategy 2040 is incorrect in respect to Foxton Beach and the yield from the Greenbelt Residential (Foxton Beach North Overlay) Zone that exists in the Greenbelt Residential within the plan. For instance, the yield from the Greenbelt Residential (Foxton Beach North Overlay) Zone owned by FRP is not 1 residential unit per 5000m29. Also, in Section 7.1 Spatial Strategy, the text and at Figure 3: Spatial Strategy¹⁰ appear to include a green colour on the Legend with the following wording "Development Protection Zone-recreation of land based activity only" and the scale¹¹ and location of this green colour on Figure 3 appears to cover part or all of the FRP Land which is zoned in the plan for Greenbelt Residential (Foxton Beach North Overlay) Zone. FRP opposes the Spatial Strategy in the document and considers the Spatial Strategy reference in the document is inaccurate, as it is **not listed** under the Plans & Strategies on the Councils website (see Appendix 3). FRP considers this representation in the Horowhenua Growth Strategy 2040 is inconsistent with the Open Space Strategy which is listed under Plans & Strategies on the Councils website. If FRP's interpretation of Figure 4 in the document is correct, then the Spatial Strategy in the document is contrary to the Environment Court Consent Order 2013 and the Operative District Plan. Similarly, FRP considers Figure 4: Transect Diagram¹² in relation

⁹ Horowhenua Growth Strategy 2040 page 18

¹⁰ Horowhenua Growth Strategy 2040 page 27

¹¹ There is no scale provided on the image to enable an approximate accurate assessment of the FRP land location in relation to the spatial strategy

¹² Horowhenua Growth Strategy 2040 page 28

North Overlay) Zone, as it misrepresents its characteristics because that overlay is incorporated in Greenbelt Residential seemingly by default. The Figure 4: Transect Diagram misunderstands the housing typology that might be applicable in the FRP zoning in the ODP, and the type of structure plan that would logically result from the Environment Court agreed design guide now incorporated in Chapter 14 of the Operative District Plan. FRP considers that it is not in the Councils best interests to imbed the Horowhenua Growth Strategy 2040 in the plan and elevate its status in PC5. FRP oppose the Horowhenua Growth Strategy 2040 inclusion in the Horowhenua District Plan text and/or it being incorporated in the plan by reference in PC5 in any form.

- 16. To assist the Council FRP therefore **opposes** wording in Section 6 of the plan (in the text of PC5) in relation to the "Horowhenua Growth Strategy 2040" and supports revised text (subject to final rewording) to the effect that: Council requires PC5 to give effect to the National Policy Statement Urban Development 2020 or subsequent NPS issued under section 52(2) of the RMA1991¹³ during the life of the Plan.
- 17. FRP **oppose** the inclusion the pre-emption in Chapter 6 of the "preparation of masterplans for the Foxton Beach ... and Tara-Ika areas and associated changes to the District Plan" and other consequential amendments being introduced into the plan through PC5 and amendments to the plan text at:
 - (a) Policy 6.3.30A,
 - (b) Rule 15.7.5(a)
 - (c) 6.1.3 Rules amendment at 15.4(b).
 - (d) Amendments to rules that relate to fencing and landscaping
 - (e) Consequential amendments to the plan change.

¹³ Or in accordance with the replacement clause if/when the RMA1991 is repealed and replaced.

- 18. FRP supports the inclusion of the National Planning Standards¹⁴ implementation in PC5 generally. PC5 was notified approximately 19 months after the National Planning Standards came into force. FRP understands that complexities exist for staged implementation but that aspects of the standards can be added into PC5 because they are mandatory. FRP Supports the land subject to PC5 being zoned large lot residential zone ("LLRZ") and medium density residential zone ("MDRZ") and future urban zone ("FUZ") and updated definitions consistent with the mandatory National Planning Standards 2019.
- 19. The s32 report for PC5 indicates the Council is not required to implement the National Planning Standards before 2024, that the exception is 16A Electronic accessibility and functionality of the standards. Section 16A includes the adoption of the NZVD2016 if they have not already done so (refer to 16A.2.c.iv). The submitters consider the adoption of NZVD2016 is relevant to all PC5 Lidar base and flood modelling and liquefaction as notified and there is a vertical variance of hundreds of millimetres between the 1953 datum and the NZVD2016. FRP considers the clarification of the datum is important to understand the effects of PC5. FRP opposes the s32 reliance on the flood modelling information (questions interpretation) because the Good Earth Matters information does not clarify the datum used and does not confirm alignment or otherwise with the Horizons Regional Council Flood Modelling datum or any other material relied on and FRP cannot therefore assess if it is relevant or not to the interpretation in terms of the assessment of effects in the PC5 s32 analysis. Similarly, FRP opposes the s32 reliance on the Tonkin and Taylor Liquefaction Assessment information reference to "RL's" but do not reference a datum for interpretive information to be assessed by the submitter.
- 20. FRP opposes the structure plan inclusion in PC5.

¹⁴ The National Planning Standards came into force in April 2019 (updated November 2019)

21. FRP opposes the Waitarere Beach Master Plan being incorporated into the operative district plan including by reference.

22. Although, FRP generally supports PC5 but opposes specific aspects of PC5, and unless those specific aspects are satisfactorily resolved though the submissions and hearings process, FRP reserves their position, that PC5

should be declined.

FRP submission seeks the deletions and amendments to PC5 inclusive of any 23. consequential amendments to the district plan text, definitions, and maps as canvassed throughout this submission.

24. FRP wishes to be heard in support its submission.

1 M Coas

Amanda Coats Con behalf of Prouch Corsultark limeted)

On behalf of FRP Investments Limited and FRP Agriculture Limited and Heritage Estates (2000) Limited

Date: 27 April 2021

Address for service of submitter:

FRP Investments Limited and FRP Agriculture Limited and Heritage Estates (2000) Limited

c/- Proarch Consultants Limited PO Box 1105, Palmerston North

Telephone: (021) 517 955 Email: amanda@proarch.co.nz

Contact person: Amanda Coats

APPENDIX 1:







<u>Home (https://www.horowhenua.govt.nz/Home)</u> / <u>Council</u> (<u>https://www.horowhenua.govt.nz/Council</u>) / <u>Have Your Say</u> (<u>https://www.horowhenua.govt.nz/Council/Have-Your-Say</u>) / Proposed Plan Change 5: Waitārere Beach Growth Area

Proposed Plan Change 5: Waitārere Beach Growth Area

Submissions closing on April 27, 2021, 04:00 PM

Overview

Proposed Plan Change 5 focuses on rezoning an area of land to the east of the existing Waitārere Beach settlement. The area covers over 100ha and focuses on future residential and commercial development in the Growth Area.

The Horowhenua District is expected to experience rapid population growth over the coming years.

Over the last couple of years there has been increasing residential development at Waitārere Beach. As a result more land is needed to



provide for residential development for the long term future over the next 20 – 30 years.

To ensure growth occurs in the area in a way that is integrated and complements the character of the existing settlement, Council prepared a Master Plan to guide future development.

Proposed Plan Change 5 implements the Waitārere Beach Master Plan through the rezoning of a growth area to the East of the existing settlement to allow for residential and commercial development.

Key outcomes

The proposed plan change seeks to deliver a number of key outcomes for Waitārere Beach, including:

- Future development is effectively integrated and connected with the existing settlement.
- A diverse range of housing is enabled to be developed, suitable for the character of the settlement.
- · The provision of connected and high amenity green spaces.
- The development of destination commercial opportunities that support the existing village centre.

Public Notification and Submissions

Proposed Plan Change 5 was publicly notified on 19 March 2021. Submissions close at 4pm on Tuesday, 27 April 2021.

The Section 32 Report, technical reports and Proposed District Plan chapters (included in Appendix 1 of the Section 32 Report Appendices) are all available to view below.

Proposed Plan Change Documents

<u>Proposed Plan Change 5: Waitārere Beach Growth Area - Section 32 Report</u>

(PDF, 3MB) (/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-

change-5-waitarere-beach-growth-area-section-32-report.pdf)

<u>Proposed Plan Change 5: Waitārere Beach Growth Area - Section 32 Report</u>
<u>Appendices - Part 1 (Appendix 1 to 3)</u> (PDF, 19MB)

(/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5-waitarere-beach-growth-area-section-32-evaluation-report-appendices-part-1.pdf)

<u>Proposed Plan Change 5: Waitārere Beach Growth Area - Section 32 Report</u> <u>Appendices - Part 2 (Appendix 4 to 8)</u> (PDF, 15MB)

(/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5-waitarere-beach-growth-area-section-32-evaluation-report-appendices-part-2.pdf)

<u>Proposed Plan Change 5: Waitārere Beach Growth Area - Zoning Map</u>

(PDF, 497KB) (/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5-waitarere-beach-growth-area-zoning-map.pdf)

<u>Proposed Plan Change 5: Waitārere Beach Structure Plan</u> (PDF, 608KB)

(/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5-waitarere-beach-growth-area-structure-plan-07a-web.pdf)

Hard copies of these documents are available to view at the following locations:

- Horowhenua District Council office: 126 Oxford Street. Hours: 8am to 5pm on Monday to Friday.
- Te Takeretanga o Kura-hau-pō: 10 Bath Street, Levin. Hours: 9am to 5.30pm on Monday, Tuesday, Thursday and Friday, 10am to 9pm on Wednesday, 10am to 4pm on Saturday and 1pm to 4pm on Sunday.
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Make a submission

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Submit online > (https://au.openforms.com/Form/798b7903-b636-

<u>42d7-a720-b8c4ce7a57f0) (https://au.openforms.com/Form/fe0d38ec-b564-4682-875f-871605d15804)</u>

Alternatively, you can print a submission form, fill it in and email it to districtplan@horowhenua.govt.nz
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mailto:districtplan@horowhenua.govt.nz?
mailto:districtplan@horowhenua.govt.nz?
mailto:subject=Proposed%20Plan%20Change%204:%20Taraika%20Growth%20Are
a.) or post it to Horowhenua District Council, Strategic Planning, Private Bag 4002, Levin 5540.

<u>Submission Form - Proposed Plan Change 5: Waitārere Beach Growth Area</u>
(<u>Print version</u>) (<u>Print vers</u>

Privacy Act 1993

Please note that submissions are public information. Information on this form including your name and submission will be accessible to the media and public as part of the decision making process. Council is required to have this by the Resource Management Act 1991. Your contact details will only be used for the purpose of the Plan Change process. The information will be held by the Horowhenua District Council, 126 Oxford Street, Levin. You have the right to access the information and request its correction.

Frequently asked questions

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- 6. Summary of submissions publicly notified for further submissions (cross submissions).
- 7. Public notification of summary of submissions for further submissions (10 working days).
- 8. Submissions and further submissions analysed. In some cases further technical information may be needed. Preparation of s42a report (recommendations on the submissions).
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- 10. Public notification of decisions.

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must be accredited Hearings Commissioners and can include Elected Members of the Council as well as independent commissioners. Often Plan Change Hearings Panels will include both.

Anyone can attend a hearing, but only some people can speak. The following people can speak at a Plan Change hearing:

- the applicant (if relevant) and anyone presenting evidence on their behalf
- submitters who have requested to be heard and anyone presenting evidence on their behalf
- the Planner on behalf of the Council
- any other experts presenting evidence on behalf of the council who had a report circulated before the hearing
- any committee member or commissioner(s).

You can find further information about the hearings process on the Ministry for the Environment website (https://www.mfe.govt.nz/publications/rma/everyday-guide-rma-appearing-council-plan-or-plan-change-hearing).

Need more information?

If you have any questions about Proposed Plan Change 5 then you can email them to districtplan@horowhenua.govt.nz
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(mailto:districtplan@horowhenua.govt.nz)

Consultation status

Status	Date
Public notification of Proposed Plan Change	19/03/2021
Submissions open	19/03/2021
Submissions close	27/04/2021

Related Information

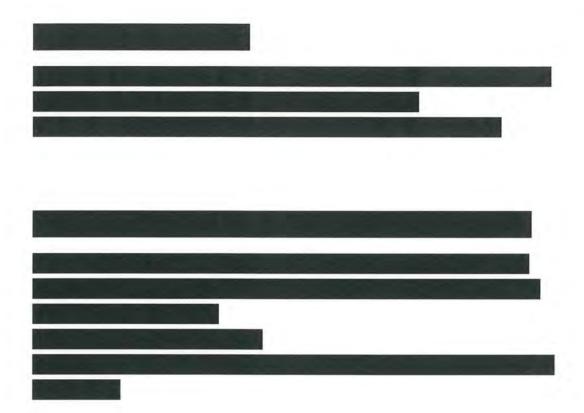
Public Notice - Proposed Plan Change for Waitārere Beach Growth Area (https://www.horowhenua.govt.nz/News-Notices/Public-Notices/Proposed-Plan-Change-for-Waitārere-Beach-Growth-Area)

Waitārere Beach Master Plan (PDF, 14MB) (/files/assets/public/master-plans/hdc-waitarere-beach-master-plan-march-2021.pdf)

APPENDIX 2:







<u>Home (https://www.horowhenua.govt.nz/Home)</u> / <u>News & Notices (https://www.horowhenua.govt.nz/News-Notices)</u> / <u>Public Notices (https://www.horowhenua.govt.nz/News-Notices/Public-Notices)</u> / Proposed Plan Change for Waitārere Beach Growth Area

Proposed Plan Change for Waitārere Beach Growth Area

On display until April 27, 2021, 11:00 PM

Horowhenua District Council has prepared a change proposed to the Operative Horowhenua District Plan 2015 (the **proposal**):

Proposed Plan Change 5: Waitārere Beach Growth Area

The following amendments to the District Plan are proposed as part of Proposed Plan Change 5:

- Minor updates to the issue discussion in Chapter 6 to reflect the adoption of the Horowhenua Growth Strategy 2040.
- Rezoning land within the Waitārere Beach Growth Area using the existing Residential, Commercial & Open Space Zones. Inclusion of additional controls for areas specified as the:
 - Waitārere Beach Mixed Use Area
 - Forest Road Integrated Residential Development Area
 - Waitārere Beach Greater Density Area.
- Inclusion of Structure Plan 07A and redaction of part of Structure Plan 07.
- Introduction of four proposed policies to apply to the Waitārere Beach Growth Area.
- Introduction and amendment to Residential Zone and Commercial Zone rules specific to the Waitārere Beach Growth Area.
- Inclusion of assessment criteria for the Waitārere Beach Growth Area for natural hazards, liquefaction and lateral spread and surface water inundation.

The proposal may be inspected at www.horowhenua.govt.nz/Council/Have-Your-Say/Proposed-Plan-Change-5-Waitarere-Beach-Growth-Area) or from the locations identified below.

- **Horowhenua District Council office:** 126 Oxford Street, Levin. Hours: 8am to 5pm on Monday to Friday.
- **Te Takeretanga o Kura-hau-pō:** 10 Bath Street, Levin. Hours: 9am to 5.30pm on Monday, Tuesday, Thursday and Friday, 10am to 9pm on Wednesday, 10.00am to 4.00pm on Saturday and 1pm to 4pm on Sunday.
- **Te Awahou Nieuwe Stroom**: 92 Main Street, Foxton. Hours: 9am to 5pm Monday to Friday, 10am to 4pm Saturday and Sunday.
- **Shannon Library:** Plimmer Terrace, Shannon. Hours: 10am to 12 noon, 1pm to 5pm Monday to Friday, 10am to 12 noon Saturday.

If you have any questions about the proposed plan change, please contact Milcah Xkenjik or a member of Horowhenua District Council's Strategic Planning Team on (06) 366 0999 or via email at districtplan@horowhenua.govt.nz (mailto:districtplan@horowhenua.govt.nz).

The following persons may make a submission on the proposal:

- the local authority in its own area may make a submission; and
- any other person may make a submission but, if the person could gain an
 advantage in trade competition through the submission, then the person
 may do so only if the person is directly affected by an effect of the proposal
 that—
 - adversely affects the environment; and
 - does not relate to trade competition or the effects of trade competition.

You may make a submission by sending a written or electronic submission to Horowhenua District Council:

- By dropping in a copy of your submission to any of the locations listed above
- By post to: Strategic Planning, Horowhenua District Council, Private Bag 4002, Levin 5540
- By email to <u>districtplan@horowhenua.govt.nz</u> (<u>mailto:districtplan@horowhenua.govt.nz</u>)
- Via the online submission from (https://www.horowhenua.govt.nz/PPC5)

The submission must be in Form 5 of the Resource Management (Forms, Fees and Procedure) Regulations 2003 and must state whether or not you wish to be heard on your submission. Copies of this form are available from Horowhenua District Council or online (https://www.horowhenua.govt.nz/PPC5).

Submissions close on Tuesday 27 April 2021 at 4pm.

The process for public participation in the consideration of the proposal under the Act is as follows:

- after the closing date for submission, Horowhenua District Council must prepare a summary of decisions requested by submitters and give public notice of the availability of this summary and where the summary and submissions can be inspected; and
- there must be an opportunity for the following persons to make a further submission in support of, or in opposition to, the submissions already made:
 - any person representing a relevant aspect of the public interest:
 - any person who has an interest in the proposal greater than the general public has:

- the local authority itself; and
- if a person making a submission asks to be heard in support of his or her submission, a hearing must be held; and
- Horowhenua District Council must give its decision on the provisions and matters raised in the submissions (including its reasons for accepting or rejecting submissions) and give public notice of its decision within 2 years of notifying the proposal and serve it on every person who made a submission at the same time; and
- any person who has made a submission has the right to appeal against the decision on the proposal to the Environment Court if,—
 - in relation to a provision or matter that is the subject of the appeal, the person referred to the provision or matter in the person's submission on the proposal; and
 - in the case of a proposal that is a proposed policy statement or plan, the appeal does not seek the withdrawal of the proposal as a whole.

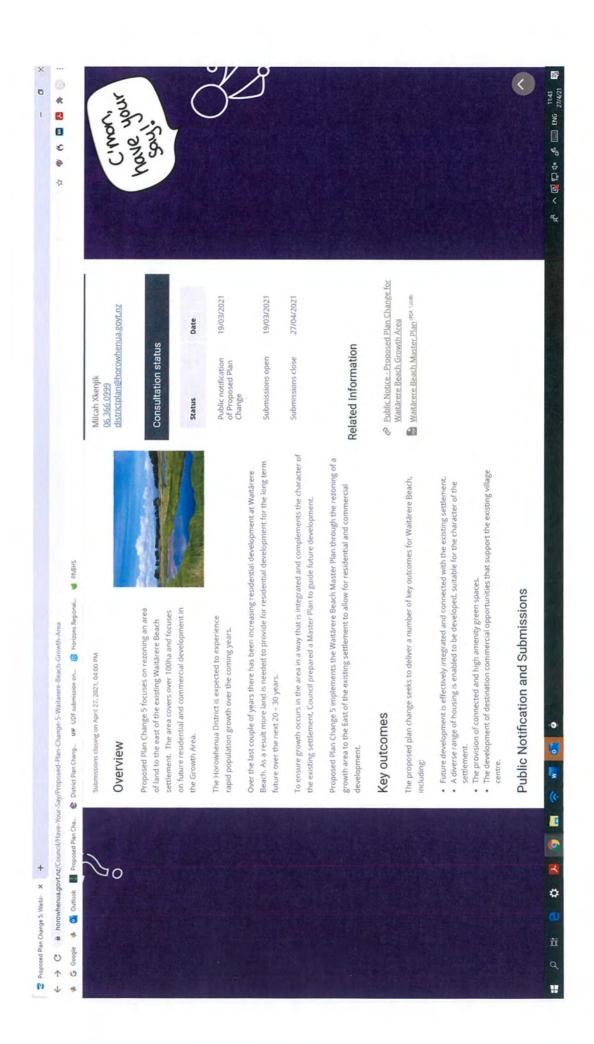
Contact details

<u>districtplan@horowhenua.govt.nz</u> (mailto:districtplan@horowhenua.govt.nz)

Tagged as:

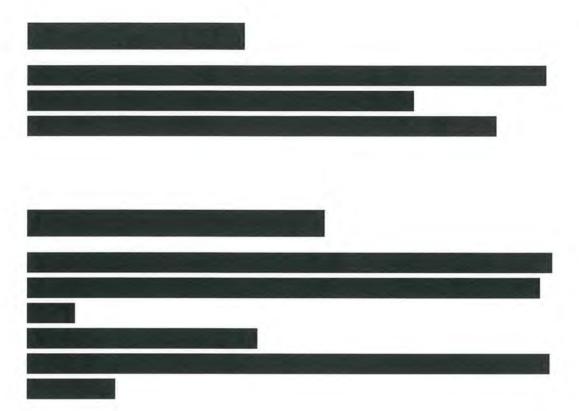
Local Plans & Strategies

APPENDIX 3









<u>Home (https://www.horowhenua.govt.nz/Home)</u> / <u>Council (https://www.horowhenua.govt.nz/Council)</u> / <u>Have Your Say (https://www.horowhenua.govt.nz/Council/Have-Your-Say)</u> / Proposed Plan Change 5: Waitārere Beach Growth Area

Proposed Plan Change 5: Waitārere Beach Growth Area

Submissions closing on April 27, 2021, 04:00 PM

Overview

Proposed Plan Change 5 focuses on rezoning an area of land to the east of the existing Waitārere Beach settlement. The area covers over 100ha and focuses on future residential and commercial development in the Growth Area.

The Horowhenua District is expected to experience rapid population growth over the coming years.

Over the last couple of years there has been increasing residential development at Waitārere Beach.
As a result more land is needed to



provide for residential development for the long term future over the next 20 – 30 years.

To ensure growth occurs in the area in a way that is integrated and complements the character of the existing settlement, Council prepared a Master Plan to guide future development.

Proposed Plan Change 5 implements the Waitārere Beach Master Plan through the rezoning of a growth area to the East of the existing settlement to allow for residential and commercial development.

Key outcomes

The proposed plan change seeks to deliver a number of key outcomes for Waitārere Beach, including:

- Future development is effectively integrated and connected with the existing settlement.
- A diverse range of housing is enabled to be developed, suitable for the character of the settlement.
- The provision of connected and high amenity green spaces.
- The development of destination commercial opportunities that support the existing village centre.

Public Notification and Submissions

Proposed Plan Change 5 was publicly notified on 19 March 2021. Submissions close at 4pm on Tuesday, 27 April 2021.

The Section 32 Report, technical reports and Proposed District Plan chapters (included in Appendix 1 of the Section 32 Report Appendices) are all available to view below.

Proposed Plan Change Documents

Proposed Plan Change Documents

Proposed Plan Change 5: Summary of Information (PDF, 1MB)

Odded after 23/3/2021

but before close of (/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5-Subminions 27/4/2021 waitarere-beach-plan-change-5-summary-of-information.pdf)

Proposed Plan Change 5: Waitarere Beach Growth Area - Section 32 Report (PDF, 3MB) (/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-

change-5-waitarere-beach-growth-area-section-32-report.pdf)

Proposed Plan Change 5: Waitarere Beach Growth Area - Section 32 Report Appendices - Part 1 (Appendix 1 to 3) (PDF, 19MB)

(/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5waitarere-beach-growth-area-section-32-evaluation-report-appendicespart-1.pdf)

Proposed Plan Change 5: Waitārere Beach Growth Area - Section 32 Report Appendices - Part 2 (Appendix 4 to 8) (PDF, 15MB)

(/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5waitarere-beach-growth-area-section-32-evaluation-report-appendicespart-2.pdf)

Proposed Plan Change 5: Waitarere Beach Growth Area - Zoning Map (PDF, 497KB) (/files/assets/public/districtplan2015/ppc5/hdc-proposed-planchange-5-waitarere-beach-growth-area-zoning-map.pdf)

Proposed Plan Change 5: Waitarere Beach Structure Plan (PDF, 608KB) (/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5waitarere-beach-growth-area-structure-plan-07a-web.pdf)

Hard copies of these documents are available to view at the following locations:

- Horowhenua District Council office: 126 Oxford Street, Hours: 8am to 5pm on Monday to Friday.
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Submission Form - Proposed Plan Change 5: Waitārere Beach Growth Area (Print version) (PDF, 108KB) (/files/assets/public/districtplan2015/ppc5/hdc-proposed-plan-change-5-waitarere-beach-growth-area-submission-form.pdf)

Privacy Act 1993

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Drop-in Sessions

The following Drop-in sessions were held at Waitārere Scout Hall to give people the opportunity to chat to our Council Officers around Proposed Plan Change 5: Waitārere Beach Growth Area:

- Tuesday 6 April 2021, 10am to 12:30pm
- Sunday 11 April 2021, 2pm to 4pm
- Monday 12 April 2021, 4pm to 6pm.

Frequently asked questions

What is a Plan Change?

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Contact details

Milcah Xkenjik
06 366 0999 (tel:063660999)
districtplan@horowhenua.govt.nz
(mailto:districtplan@horowhenua.govt.nz)

Consultation status

Status	Date
Public notification of Proposed Plan Change	19/03/2021
Submissions open	19/03/2021
Submissions close	27/04/2021

Related Information

<u>Public Notice - Proposed Plan Change for Waitārere Beach Growth Area</u> (https://www.horowhenua.govt.nz/News-Notices/Public-Notices/Proposed-Plan-Change-for-Waitārere-Beach-Growth-Area)

<u>Waitārere Beach Master Plan</u> (/files/assets/public/master-plans/hdc-waitarere-beach-master-plan-march-2021.pdf)





Waitārere Beach Proposed Plan Change 5

What is a plan change?

A Plan Change is when Council proposes to make changes to the District Plan.

The purpose of the District Plan is to achieve the sustainable management of natural and physical resources and to manage any negative effects of development on the environment. Essentially, it outlines what people can do with their land.

It does this through objectives, policies and rules that specify which activities require Council approval. It also covers what the Council will consider when deciding whether or not to give approval to future applications for resources consent (e.g. subdivision).

Council is required to follow a formal process to undertake a plan change and this involves publicly notifying the proposed changes to the District Plan to give the community the opportunity to have their say.

What is the purpose of this plan change?

The Horowhenua District is expected to experience rapid population growth over the coming years.

Over the last couple of years there has been increasing residential development at Waitārere Beach. As a result more land is needed to provide for residential development for the long term future over the next 20 – 30 years.

To ensure growth occurs in the area in a way that is integrated and complements the character of the existing settlement, Council prepared a Master Plan to guide future development.

Proposed Plan Change 5 implements the Waitārere Beach Master Plan through the rezoning of a growth area to the East of the existing settlement to allow for residential and commercial development.

The proposed plan change seeks to deliver a number of key outcomes for Waitārere Beach, including:

- Future development is effectively integrated and connected with the existing settlement.
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- The provision of connected and high amenity green spaces.
- The development of destination commercial opportunities that support the existing village centre

Summary of Objectives, Policies, and Rules

Please note: Landowners affected by the Proposed Plan Change 5 and those who intend to make a submission, should read the full version of the plan change documents which are available on our website, or in hard copy at the locations specified on the final page of this pamphlet.

Proposed Plan Change 5 covers an area of land to the East of the existing Waitārere Beach settlement.

The area covers approximately 100ha and focuses on future residential and commercial development in the Growth Area.

Structure Plan and Zoning

Rezoning

Lifting deferred zoning from land that had been previously rezoned for future development & rezoning land within the Growth Area Residential, Commercial & Open Space Zones.

Inclusion of additional controls as follows:

Waitarere Beach Mixed Use Area: To enable residential and some commercial activities to establish in the identified area.

Forest Road Integrated Residential Development Area: To provide a specified location for the development of a lifestyle village at 40 Forest Road.

Waitārere Beach Greater Density Area: To enable lots down to 450m² (smaller lot size than the current 800m² for the standard residential zone in Waitārere Beach) in suitable areas of high amenity (e.g. near to open space and flat topography) as identified on the Proposed PC5 planning maps.

Structure plan

 Inclusion of Structure Plan 07A – implementing changes resulting from the master plan process.

Residential Policies and Rules

Policies

For proposed policies to outline the intended development outcomes in the Growth Area.

Residential Rules

- Integrated residential development: Conditions for minimum lot size, roading connection, and inclusion of non-notification rule.
- Enabling subdivision down to 450m² in the Waitārere Beach Greater Density Area.
- Inclusion of new matters of control for liquefaction and lateral spread and surface water inundation.
- Inclusion of a new condition requiring a geotechnical report to be provided to identify liquefaction risks and mitigation.
- Amendment of fencing rules to limit fence heights adjoining public space within the Waitārere Beach Growth Area.

Commercial Rules

 Inclusion of a new set of rules for the Waitārere Beach Mixed Use Area.

Assessment Criteria

Inclusion of assessment criteria for natural hazards, liquefaction and lateral spread and surface water inundation.





Who could be affected by this plan change?

Landowners within and around the Waitārere
Beach area could be affected as the changes
create different development opportunities for
these properties. While not everyone will have
aspirations of developing, property owners need to
be aware that the proposed changes could result in

different levels of development on their neighbour's properties in the future.

Furthermore, the general community may have an interest in how the area develops, as the area will mean Waitārere Beach looks different in the future.



Have your say

Anyone can make a submission on Proposed Plan Change 5. Submissions can be in support and/or in opposition to the amendments proposed as part of this plan change.

Submissions can be made online by visiting www.horowhenua.govt.nz/PPC5

Submissions can also be made in hard copy. Hard copy submission forms are available to be collected at Council's main office in Levin (126 Oxford Street) as well as the community centres and libraries in Levin, Foxfor and Shannon.

Submission forms can also be downloaded from Council's website, printed and filled in.

Submissions on Proposed Plan Change 5 close at 4pm on 27 April 2021

Need more information?

Council will be holding drop-in information sessions. These sessions will provide an opportunity to speak with Council officers about the Plan Change.

Drop In Sessions

Venue: Waitārere Scout Hall, 627 Waitārere Beach Road, Waitārere Beach

Dates: Tuesday 6 April 2021, 10am-12:30pm

Sunday 11 April 2021, 2pm-4pm Monday 12 April 2021, 4pm-6pm

Proposed Plan Change 5 documents are available to be viewed online at Council's website www.horowhenua.govt.nz/PPC5 or in hard copy at the following locations (during opening hours):

- Horowhenua District Council office: 126 Oxford Street, Levin. Hours: 8am to 5pm on Monday to Friday.
- Te Takeretanga o Kura-hau-pō: 10 Bath Street, Levin. Hours: 9am to 5.30pm on Monday, Tuesday, Thursday and Friday, 10am to 9pm on Wednesday, 10am to 4pm on Saturday and 1pm to 4pm on Sunday.
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If you have any questions about Proposed Plan Change 5 then you can email districtplan@horowhenua.govt.nz or call Council on (06) 366 0999 and ask to speak to Milcah Xkenjik or a member of the Strategic Planning Team.

APPENDIX 4

Growth Dashboard





September 2019

Overview of Horowhenua District

The Horowhenua District has had strong growth in value of building consents and health enrolments. Value of consents issued as at 30 June 2019 was \$113,831,925 compared to \$97,306,905 for the same period last year.

With more than 300 residential consents issued in the 12 months to June, this is more than double the 10-year average of 135.

In 2018, 50% of building consents issued had 3 bedrooms and 62% of residential dwellings consented were for standard dwellings.

Over the past few years Horowhenua's population growth has jumped to record levels. Health enrolments, a broad indicator of population growth, increased by 2.7% in the 12 months to June 2019, which suggests that the population continues to grow strongly.

Population growth is driving demand for housing and pushing up house prices in Horowhenua. Average house values increased by 15% over the year, reducing affordability significantly.

In summary, Horowhenua District remains an attractive option. We can see this through the continued growth in those wanting to build here and new residents increasing enrolments in services.

Resource Consenting

From 1 July 2019

- 72 resource consents have been lodged as at 31 August 2019 compared to 51 at the same time last year.
- 30 subdivision consents approved as at 31 August 2019, compared to 19 at the same time last year.
- As at 31 August 2019 a total of 11 new allotments have been created as a result of s223 (approval of title plan) & 0 new allotments have been created as a result of s224 (completion of physical works) certificates being issued for subdivisions.
- YTD the level of Resource Consenting activity has significantly higher level of activity that was experienced over a similar period in 2018/19.

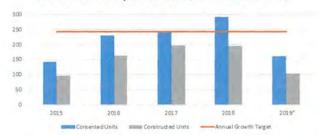
Building Consents

From 1 July 2019

- Value of consents issued as at 31 August 2019 is \$19,141,195 compared to \$22,350,277 for the same period last year
- 130 consents issued as at 31 August 2019, compared to 156 for the same period last year.
- 32 new dwelling consents were issued as at 31 August 2019 compared to 53 for the same period in the 2018/2019 year.
- 132 building consents were lodged as at 31 August 2019 compared to 135 for the same period in the 2018/19 year.
- Consents have been issued for 41 New Residential Dwelling Units as at 31 August 2019.
- YTD the number of Building Consenting activity is slightly lower than the same period in 2018/19.

Dwelling units consented vs Dwelling units constructed

Calendar Year to September 2019 (Horowhenua District)



*as at 31 August 2019

Building Consents Issued (\$)

Financial Year to June 2019 (Horowhenua District)



New lots created vs New lots approved

Financial Year 2018/2019 (Horowhenua District)



Dwellings Consented -Standard vs Retirement Unit

Building Consents in 2018 (Horowhenua District)

	Number	%
Retirement Unit	106	38%
Standard Home	167	62%
Total	273	



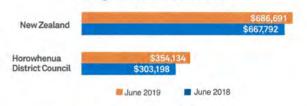
Number of Dwellings by Bedroom Number

Building Consents Issued in 2018 (Horowhenua District)

No Dwellings by Number of Bedrooms	1	2	3	4	5
Standard Homes	8	42	73	37	7
Retirement Unit	12	29	65	0	0
Total	20 (7%)	71 (26%)	138 (50%)	37 (13%)	7 (2%)

Average Current House Value

Average for 12 months to June 2019



Health Enrolments

Annual Average % change June 18 - June 19 (Horowhenua District)

New Zealand	1.8%
Horowhenua District Council	2.7%

Health enrolments, a broad indictator of population growth, increased by 2.7% in the 12 months to June 2019 which suggests that the population continues to grow strongly.

Chart	Data Source	rce Timeframe		
Average Current House Value	Infometrics - http://www.infometrics.co.nz/	June 18 - June 19		
Traffic Volume Growth	Infometrics - http://www.infometrics.co.nz/	June 18 - June 19		
Housing Affordability	Infometrics - http://www.infometrics.co.nz/ via Core Logic	June 18 - June 19		
Health Enrolments	Infometrics - http://www.infometrics.co.nz/	June 18 - June 19		
New lots created vs new lots approved	HDC Reporting	1 July 18 - 30 June 18		
Number of dwellings by bedroom number	HDC Reporting	1 January 18 - 31 December 18		
Dwelling consented – Standard vs Retirement Unit	HDC Reporting	1 January 18 - 31 December 18		
Number of lots potentially eligible for 250 m ² subdivision	HDC Reporting	As at 2017		
Dwelling units consented vs dwelling units constructed	HDC Reporting	1 July - 30 June		
Building consents issued (\$)	HDC Reporting	1 July - 30 June		

Number of Lots Potentially Eligible for 250m² Subdivision

As at 2017 (Horowhenua District)

	Number of Lots 500 - 900 m ²
Levin	3,981
Foxton	508
Foxton Beach	834
Shannon	335
Total	5,658

In 2017 Council completed a plan change that increased opportunities for infill residential development. This included reducing the minimum net site area for subdivision down to 250m² in Levin, Foxton, Foxton Beach, and Shannon when the parent title is between 500m² - 900m². The number of sites impacted by this change is shown above.

Housing Affordability

Annual, Year to date June 2019 (Horowhenua District)



Housing affordability in Horowhenua District has deteriorated on average over the year to June 2019.

During the last 10 years, housing in Horowhenua District was most affordable in September 2014, when the index reached a low of 4.8

Housing affordability compares average current house values with average annual employment earnings from filled jobs. The index is the ratio of the average current house value to average annual earnings. Please note the four most recent quarters are based on estimated average annual earnings, while earnings data from earlier years are based on actual figures from Linked Employer Employee Data published by Stats NZ.

Traffic Volume Growth

Annual Average % change (Horowhenua District)



Traffic flows in Horowhenua District increased by 2.3% over the year to June 2019. This compares with an increase of 1.5% in New Zealand.



Growth Dashboard



Overview of Horowhenua District

The Horowhenua district has had strong growth in value of building consents, consumer spending, tourist spending, and commercial registrations all support the picture of a bustling local economy.

The strength of the local economy is also shown by the 2.8% growth in traffic flows, which has held up compared to a dip in national traffic growth. With commercial vehicle registrations in the district have been climbing since 2016 and in the March 2019 year they grew by 11.7% higher than the 10 year average.

Electronic card spending on retail purchases remained well above the national average, growing 8.1% in the district compared with 4.1% nationally.

Horowhenua's tourism sector contributes nearly 5% of the district's GDP and has been enjoying healthy growth. Guest nights in commercial accommodation were up by 8.2% in Horowhenua in the 12 months to March 2019, compared with flat growth in the national economy. Tourism expenditure in Horowhenua was up 4.5% compared with 3.3% nationally.

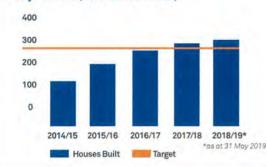
Population growth is a key contributor to growth of the economy of Horowhenua. The district's growth has continued to be influenced by the lack of affordable housing options in Wellington, as families look further afield for housing. Although not a perfect measure of population, the 2.7% growth in health enrolments indicates the population of Horowhenua continues to grow strongly.

At 15.6%, house price inflation remained well above the national average of just 1.3% in the March 2019 year. With residential consents in the district growing 34.5% to near historic highs in the March 2019 year, with the value of Building Consents issued sitting at an all-time high reaching \$1.5m in the financial year to May 2019 compared to \$90 Million for the same period last year. This is the first time the value has exceeded \$100m.

In summary, the Horowhenua economy continues to perform well and is growing slightly faster than the national economy.

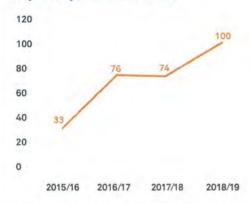
Total New Dwelling Units vs Annual Target

1 July - 30 June (Horowhenua District)



Subdivision Consents Approved

1 July - 31 May (Horowhenua District)



Resource Consenting

247 consents have been lodged as at 31 May 2019 compared to 176 at the same time last year.

100 subdivision consents approved as at 31 May 2019, compared to 74 at the same time last year.

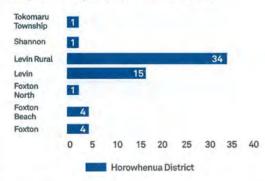
As at 31 May 2019 a total of 100 new allotments have been created as a result

of s223 (approval of title plan) & 60 new allotments have been created as a result of s224 (completion of physical works) certificates being issued for subdivisions.

Resource Consent activity and the level of enquiries has risen this month with a higher level of activity that was experienced in 2017/18.

New lots created (S224)

1 July 18 - 31 May 2019 (Horowhenua District)



Building Consents

Value of consents issued as at 31 May 2019 is \$105,648,784 compared to \$90,657,961 for the same period last year

653 consents issued as at 31 May 2019, compared to 644 for the same period last year.

214 new dwelling consents at 31 May 2019 against 209 for the same period in the 2017/2018 year.

637 building consents were lodged as at 31 May 2019 compared to 615 for the same period in the 2017/18 year.

Consents have been issued for 288 New Residential Dwelling Units as at 31 May 2019.

The number of Building Consents lodged and issued YTD is higher than the same period in 2017/18. The value of consents issued and the number of new dwelling consents issued is higher than in 2017/18.

Building Consent Issued (\$)

1 July - 30 June (Horowhenua District)

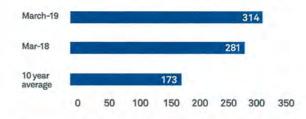


2014/15 2015/16 2016/17 2017/18 2018/19*

*as at 31 May 2019

Commercial Vehicle Registrations

Annual Number March 18 - March 19 (Horowhenua District)



- The number of commercial vehicles registered in Horowhenua District increased by 11.7% in the year to March 2019 compared with the previous 12 months. Growth was higher than in New Zealand, where commercial vehicle sales decreased by -0.07%.
- A total of 314 commercial vehicles were registered in Horowhenua District in the year to March 2019. This is higher than the ten year annual average of 173.

Average Current House Value

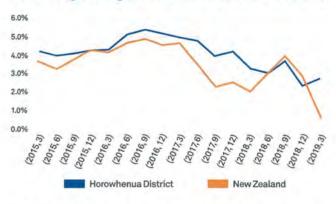
Average for 12 months to March 2019



 The average current house value in Horowhenua District was up 15.6% in March 2019 compared with a year earlier. Growth outperformed relative to New Zealand, where prices increased by 1.3%

Traffic Volume Growth

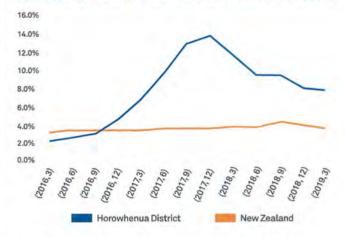
Annual Average % change March 18 - March 19 (Horowhenua District)



 Traffic flows in Horowhenua District increased by 2.8% over the year to March 2019. This compares with an increase of 0.6% in New Zealand

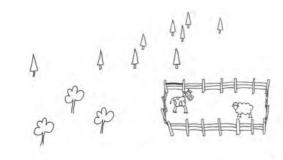
Growth in Consumer Spending

Annual Average % change March 18-March 19 - (Horowhenua District)



 Electronic card consumer spending in Horowhenua District, as measured by Marketview, increased by 8.1% over the year to March 2019 compared to the previous year. This compares with an increase of 4.1% in New Zealand.

Chart	Data Source	Timeframe
Average Current House Value	Infometrics - http://www.infometrics.co.nz/	March 18 - March 19
Growth in Consumer Spending	Infometrics - http://www.infometrics.co.nz/	March 18 - March 19
Traffic Volume Growth	Infometrics - http://www.infometrics.co.nz/	March 18 - March 19
Commercial Vehicle Registrations	Infometrics - http://www.infometrics.co.nz/	March 18 - March 19
New Lots Created (S224)	HDC Reporting	1 July 18 - 31 May 19
Building Consent Issued (\$)	HDC Reporting	1 July - 30 June
Total New Dwelling Units vs Annual Target	HDC Reporting	1 July – 30 June
Subdivision Consents Approved	HDC Reporting	1 July - 31 May





Growth Dashboard





December 2019

Overview of Horowhenua District

Horowhenua is growing ahead of the national economy with local economy expanding by 2.8% in the 12 months to September 2019 compared to 2.4% nationally. Consumer spending grew by 6.2%, almost double the national average of 3.4%. This indicates that more money is being spent within the District, which can be linked to an increase of guest nights, tourism expenditure and traffic flow.

Strong population growth is boosting the demand for housing with the average house value increased by nearly 20% in the year to September 2019. This was the fourth fastest growth among 66 territorial authorities, prices reaching a record high of \$362,518 reducing the affordability. 701 houses in the Horowhenua District were sold in the year leading to September 2019; this is an increase to the ten-year average of 613 houses sold per annum in the District.

In summary the Horowhenua District is experiencing growth that is not only overtaking the national average but is also exceeding previously made projections. With growth comes the need to adapt and cater for the change within the District. Planning for this change will be a key focus for the District in 2020.

Growth Trends

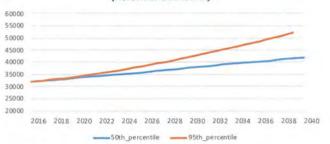
- Horowhenua is the fastest growing district in the Manawatū/Whanganui region and top third in NZ.
- At the current rates, the population could increase by 33% over the next 10-15 years.
- Statistics NZ Population Estimate (Provisional June 2019) = 35,000 people.
- Horowhenua was not forecasted to reach 35,000 tracking on the 95th percentile until 2022 showing the District is growing faster than expected.

Horowhenua Populations



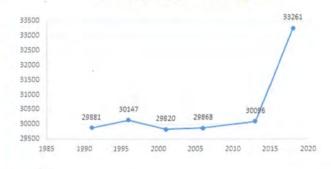
Population Projections

(Horowhenua District)



Sense Partners were commissioned in 2017 to provide a population forecast. HDC adopted the 50th Percentile or medium growth rate, however the current census data is showing that the Horowhenua District is tracking along the 95th Percentile meaning the population is growing a lot faster than initially anticipated.

Horowhenua District Population Census Data



Population Growth across the Region

Annual Average Growth Rate (2013-2018)

Horowhenua District	2.0%
Manawatū District	1.9%
Whanganui District	1.5%
Rangitikei District	1.4%
Tararua District	1.3%
Palmerston North City	1.1%
Ruapehu District	0.8%

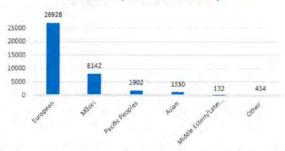


Population Change by Age Group Census Comparison

Age Group	2006-2013	2013-2018	
<15 years	-579	324	
15-29 years	201	780	
30-64 years	-558	984	
65+ years	1,170	1,074	

Ethnic Group Distribution

Census 2018 (Horowhenua District)



Of the residents new to Horowhenua, 42% identified as Asian, 38% Pacifica and 26% Māorī. It is important to understand the heritage and backgrounds of new people joining our community so we can make sure we communicate effectively with these groups, respond to their needs, and celebrate the variety of cultures present within our community.

Please note that some people identify as more than one ethnic group.

Housing



- Population of 35,000 people (provisional population June 2019 estimate) would require 17,000 houses.
- Previous forecasts indicated 4,900 extra houses would be needed over the next 20 years.
- At the current growth rate we will need the same number of houses (4,900) in less than 10 years to keep up.
- This means increasing from 244 extra houses a year to 440.

Average Current House Value

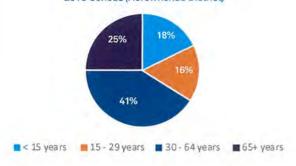
Average for 12 months to September 2019



The average current house value in Horowhenua District was up 19.9% in September 2019 compared with a year earlier. This was higher than New Zealand, where prices increased by 1.9%.

Age Group Distribution

2018 Census (Horowhenua District)



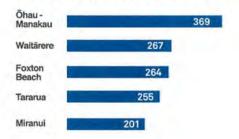
Health Enrolments

Annual Average % change (Horowhenua District) September 18 - September 19

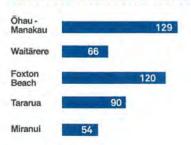


The number of people enrolled with a primary health organisation in the Horowhenua District in the year to September 2019 increased by 2.7% compared with the previous year. Growth was higher relative to New Zealand, where the number of enrolments increased by 2.0%.

Top 5 Population Increase by Statistical Area Census 2013-2018



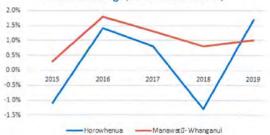
Top 5 Dwellings Built by Statistical Area Census 2013-2018



For designated areas, please refer to map on page 3.



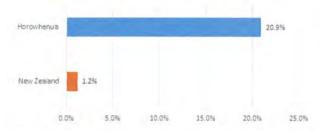
School Roll Annual % Change (Horowhenua District)



Horowhenua Districts school roll grew by 1.7% in the past year which was faster than the Manawatū-Whanganui Region.

Guest Nights

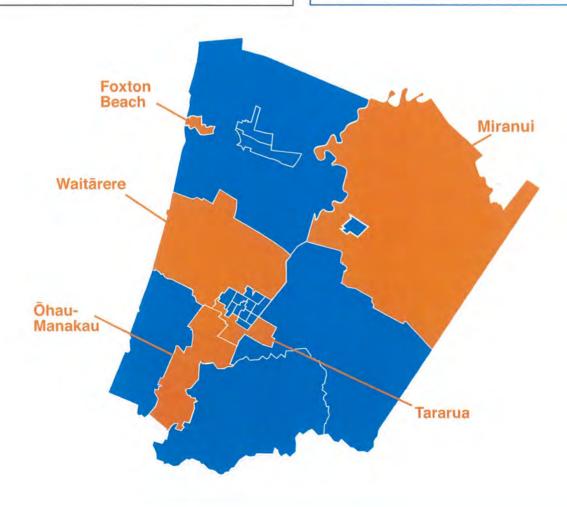
Annual Average % Change (Horowhenua District) September 18 - September 19



Total guest nights in Horowhenua District increased by 20.9% in the year to September 2019. This compares with an increase of 1.2% in New Zealand.

Visitors stayed a total of 105,790 nights in Horowhenua District during the year to September 2019, which was up from 87,486 a year ago.

Chart	Data Source	Timeframe		
School Roll	Ministry of Education	January - December yearly		
Guest Nights	Infometrics - http://www.infometrics.co.nz/	September 2018 - September 2019		
Health Enrolments	Infometrics - http://www.infometrics.co.nz/	September 2018 - September 2019		
Average Current House Value	Infometrics - http://www.infometrics.co.nz/	September 2018 - September 2019		
Population Projections	Sense Partners – Socio-eco- nomic Projections – July 2017	January 16 - December 2040		
Growth Trends	Census 2018 - Statistics https://www.stats.govt.nz/	March 18 - June 2038		
	Infometrics - http://www.infometrics.co.nz/			
Ethnic Group	Census 2018 - Statistics https://www.stats.govt.nz/	Census 2018		
Age Group Distribution	Census 2018 - Statistics https://www.stats.govt.nz/	Census 2018		
Housing	Census 2018 - Statistics https://www.stats.govt.nz/	March & June 2018		
	HDC Reporting			
Top 5 Population Increase	Census 2018 - Statistics https://www.stats.govt.nz/	Census 2013 – 2018		
Top 5 Dwellings Built by Area	Census 2018 - Statistics https://www.stats.govt.nz/	Census 2013 – 2018		
Growth across the Region	Census 2018 - Statistics https://www.stats.govt.nz/	Census 2013 – 2018		
Horowhenua Population	Census 2018 - Statistics https://www.stats.govt.nz/	Census 1991 – 2018		
Population Change by Age Group	Census 2018 - Statistics https://www.stats.govt.nz/	Census 2006 – 2018		





Quarterly Economic Monitor

Horowhenua District September 2020

Overview of Horowhenua District

Horowhenua's economy is showing clear signs of bounce back after the lockdown induced slump in the June 2020 quarter. Infometrics provisionally estimates that GDP grew 1.5% in the September 2020 quarter compared with the same quarter in 2019. Measured over the 12 months to September GDP declined by 1.1% compared with -3.3% in the national economy.

Growth in consumer spending provides further evidence of economic recovery. Spending in the September quarter was 6.3% up from the same quarter in 2019. For the year to September 2020 spending growth was in positive territory compared with a decline of 2.7% at the national level. Horowhenua has benefitted from Wellington commuters spending more time working from home and spending more locally.

That Horowhenua's economy is faring better than many parts of the country is confirmed by the slower growth of Jobseeker Support recipients. The number of recipients in Horowhenua increased by 14% over the year to September 2020 compared with 27% nationwide. The Infometrics Local Economic Insights Dashboard shows that in the month of September 2020, there were 1,935 Jobseeker Support recipients and a further 29 COVID-19 Income Relief Payment recipients in the district. A year earlier there were 1,644 Job Seeker Support recipients.

The Horowhenua housing market is red hot with the average house value for the 12 months to September increasing to \$432,851, up 17% compared to the previous 12 months. More than 250 houses were sold in Horowhenua in the September quarter which is the highest level since 2016.

Although the number of residential building consents issued in Horowhenua dropped below 50 in the September quarter (compared to a quarterly average of about 70 over the past three years) we expect the number to rise again due to rocketing house values. Non-residential building consents are running at a level nearly double the 10-year average.

Horowhenua's agriculture and food processing sectors are a key source of strength in the district. The district's dairy farmers are expected to reap \$120m this coming season, down slightly from \$127m last season.

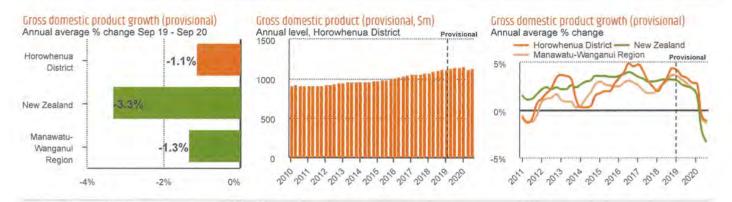
Indicator	Horowh	enua District	Manawatu-V	Vanganui Region	New	Zealand
Annual average % change						
Gross domestic product	4	-1.1%	4	-1.3%	4	-3.3%
Traffic flow	-	-8.2%	4	-7.8%	4	-10.5%
Health Enrolments	4	2.0%	4	1.3%	•	2.3%
Consumer spending	4	0.9%	4	0.4%	4	-2.7%
Residential consents	4	-4.5%	4	7.8%	•	3.5%
Non-residential consents	4	26.0%	4	59.0%	4	-7.6%
House prices*	4	17.4%	4	16.2%	a	8.0%
House sales	4	1.3%	4	-5.9%	-	1.1%
Tourism expenditure	4	-10.0%	4	-9.7%	4	-16.5%
Car registrations		-9.8%	-	-15.6%	4	-22.9%
Commercial vehicle registrations	4	-2.0%	4	-17.8%	4	-26.1%
Jobseeker Support recipients	•	14.1%	•	15.1%	*	27.3%
evel						
Unemployment rate		5.5%		4.5%		4.4%

^{*} Annual percentage change (latest quarter compared to a year earlier)

Overview of national economy

Economic activity rebounded strongly in the September 2020 quarter as the post-lockdown surge boosted spending levels and saw activity across various sectors attempt to make up for lost time. The pandemic still looms large over regional economies, and the pathway ahead is uncertain. But after a hammer blow to the economy in the first half of 2020, the economic rebound in the September quarter has set New Zealand on a more optimistic course ahead. Sustained export activity, combined with New Zealanders opening their wallets to domestic tourism, new cars, and home improvements, has buoyed confidence that the New Zealand economy will emerge from COVID-19 less battered than other parts of the world. The strength of the bounce back in economic activity is cause for celebration, but make no mistake, the pandemic has not finished yet.

Gross domestic product (provisional)



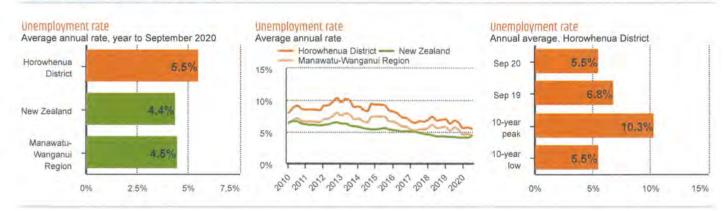
Highlights for Horowhenua District

- GDP (provisional) in Horowhenua District was down 1.1% for the year to September 2020 compared to a year earlier. Growth was higher than in New Zealand (-3.3%) and higher than in Manawatu-Wanganui Region (-1.3%).
- GDP (provisional) was \$1,130 million in Horowhenua District for the year to September 2020 (2019 prices).
- Annual GDP growth in Horowhenua District peaked at 4.9% in the year to September 2016.

National overview

Economic activity in New Zealand expanded 11.8% in the September quarter, according to provisional estimates from Infometrics. After recording the sharpest quarterly fall in economic activity on record in the June quarter, September's rebound was always going to sound impressive. Although New Zealand is now technically out of a recession (for now), economic activity in September was still 3.3%pa below 2019 levels. Tourism-based sectors and others originally unable to operate drove the rebound in the September quarter after being severely restricted from operating during higher Alert Levels, although the Auckland restrictions in August took the shine off activity in the third quarter.

Unemployment rate



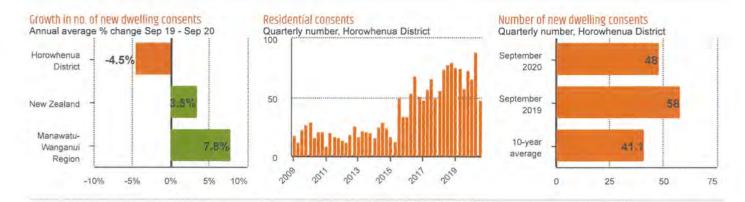
Highlights for Horowhenua District

- The annual average unemployment rate in Horowhenua District was 5.5% in September 2020, down from 6.8% a year earlier.
- The unemployment rate in Horowhenua District was higher than in New Zealand, where the unemployment rate averaged 4.4% over the year to September 2020.
- Over the last ten years the unemployment rate reached a peak of 10.3% in December 2012;

National overview

The national unemployment rate rose to 5.3% (seasonally adjusted) in the September 2020 quarter, as job losses continued to mount. On average over the last 12 months, the unemployment rate nationally was 4.4%, highlighting just how fast the pandemic has shifted economic conditions. Our system focuses on annual averages to smooth out volatility at a regional level each quarter, but the sharp rise in unemployment has been felt across the country. The labour market hit from COVID-19 has been less severe than originally feared, with fewer job losses than forecast. The labour market hit is coming through various channels. Some workers are still employed but working fewer hours, whereas others are out of a job, but not looking for a new role yet. However, women, Māori, and young people continue to be hardest hit by the downturn, and we expect that unemployment will continue to rise as we head into 2021.

Residential consents



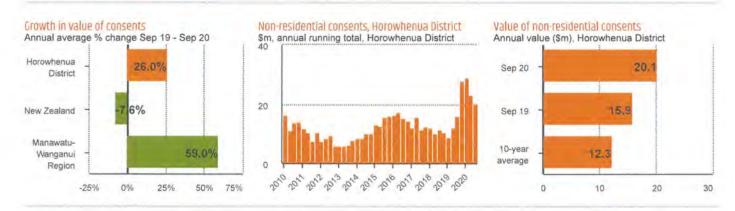
Highlights for Horowhenua District

- A total of 48 new residential building consents were issued in Horowhenua District in the September 2020 quarter, compared with 58 in the same quarter last year.
- On an annual basis the number of consents in Horowhenua District decreased by 4.5% compared with the same 12-month period a
 year ago. The number of consents in New Zealand increased by 3.5% over the same period.

National overview

Residential building consents were up 3.5% over the year to September 2020. New townhouses were responsible for most of the growth over the year, up 34%, driven by an incredibly hot housing market and rapid house price growth. Apartment and retirement buildings were dragging the chain for the quarter. We expect the number of residential consents to weaken throughout next year. However, the heat in the housing market continues to provide upside risks, particularly as interest rates are set to be lower, and loan to value ratio restrictions are still a few months away at earliest.

Non-residential consents



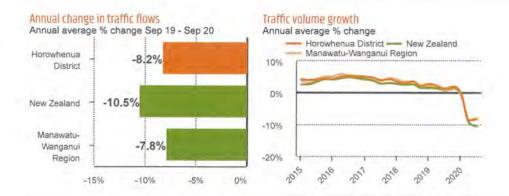
Highlights for Horowhenua District

- Non-residential building consents to the value of \$20 million were issued in Horowhenua District during the year to September 2020.
- The value of consents increased by 26.0% over the year to September 2020. By comparison the value of consents in New Zealand decreased by -7.6% over the same period.
- Over the last 10 years, consents in Horowhenua District reached a peak of \$29 million in the year to March 2020.

National overview

Non-residential building consents were strong in the September 2020 quarter, helping to offset some of the weakness earlier in the year, with consents now down 7.6% over the year to September 2020. New consents were responsible for all the growth in the last quarter, while the value of alterations and additions contracted. Social, cultural, and religious building consents have been particularly strong in recent months. We expect the government to open their purse strings to help support the COVID-19 recovery, and therefore expect strong public non-residential consents going forward. Conversely, we expect private consents to weaken over the next year as businesses struggle with a weaker economy going forward.

Traffic flow



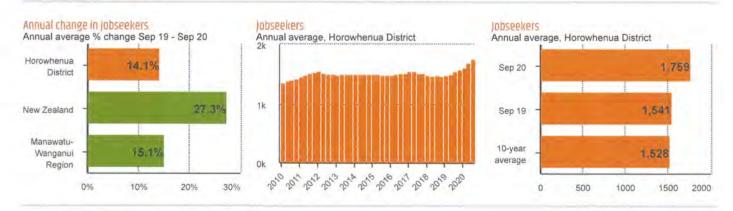
Highlights for Horowhenua District

 Traffic flows in Horowhenua District decreased by -8.2% over the year to September 2020. This compares with an decrease of -10.5% in New Zealand.

National overview

Vehicle movements in the September 2020 quarter recovered substantially from lower levels in June, as Kiwis got moving again. However, traffic activity was still 3.3%pa lower than a year earlier, with fewer tourists in the country and lower trade activity overall. The effects of the Auckland restrictions in August are clear, with Auckland and neighbouring Waikato recording sustained hits to traffic activity even as most of the country saw a sustained bounce-back from the Level 4 lockdown hit the previous quarter. Otago recorded an annual decline, partially stemming from the lack of tourist activity, while both Wellington and Canterbury also saw weak traffic activity as major urban centres remained harder hit.

Jobseekers



Highlights for Horowhenua District

- Working age Jobseeker Support recipients in Horowhenua District in the year to September 2020 increased by 14.1% compared with the previous year. Growth was lower relative to New Zealand, where the number of Jobseeker Support recipients increased by 27.3%.
- An average of 1,759 people were receiving a Jobseeker Support benefit in Horowhenua District in the 12 months ended September 2020. This compares with an average of 1,528 since the start of the series in 2010.

National overview

The number of Jobseeker Support has continued to rise, as job losses mounted across the economy. In total, over 204,000 New Zealanders are on a Jobseeker Support benefit, up over 61,000 from September 2019 – a 43%pa rise. There were also a considerable number of Kiwis on the COVID-19 Income Relief Payment (CIRP). In August, nearly 25,000 people were CIRP recipients, which provides a 12-week payment. With entitlements now ending, just under 12,000 CIRP recipients were recorded at the end of September 2020.

House prices



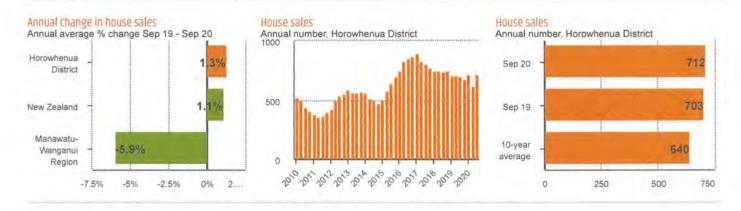
Highlights for Horowhenua District

- The average current house value in Horowhenua District was up 17.4% in September 2020 compared with a year earlier. Growth outperformed relative to New Zealand, where prices increased by 8.0%.
- The average current house value was \$432,851 in Horowhenua District over the September 2020 year. This compares with \$734,689 in New Zealand.

National overview

House prices have shot ahead in the September quarter, rising 8.0% on average over the year to September 2020. This incredibly strong growth has been driven by high net migration at the beginning of the pandemic, and incredibly low interest rates. We expect house prices to continue to grow through summer, as the Reserve Bank implements policy to lower interest rates further, while threatening the return of loan to value ratio restrictions. This strong growth in house prices is at a time where housing is already highly unaffordable to most first home buyers, and the economy battles its sharpest contraction on record.

House sales



Highlights for Horowhenua District

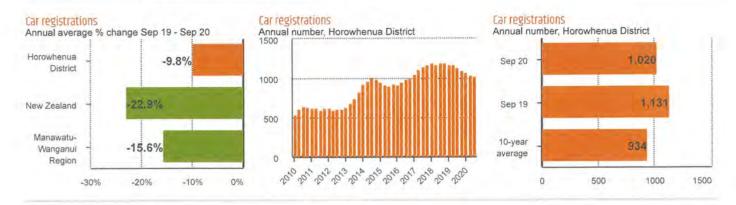
- House sales in Horowhenua District in the year to September 2020 increased by 1.3% compared with the previous year. Growth outperformed relative to New Zealand, where sales increased by 1.1%.
- A total of 712 houses were sold in Horowhenua District in the 12 months ended September 2020. This compares with the ten year average of 640.

National overview

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The number of houses sold in the year to September 2020 was sitting 1.1% higher than the same period a year earlier. Growth in sales has been particularly high through the last couple of months, as prices race ahead and interest rates fall lower, encouraging even more buyers into the market. We expect real estate activity to remain hot through summer, as buyers look to take advantage of record low interest rates before loan to value ratio restrictions return.

Car registrations



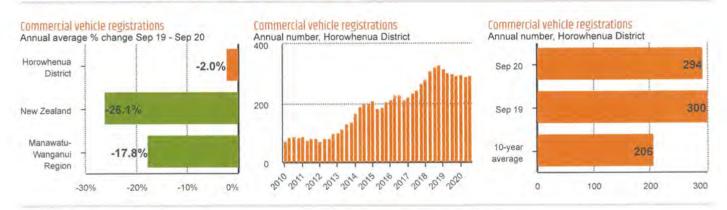
Highlights for Horowhenua District

- The number of cars registered in Horowhenua District decreased by -9.8% in the year to September 2020 compared with the previous 12 months. Growth was higher than in New Zealand, where car sales decreased by -22.9%.
- A total of 1,020 cars were registered in Horowhenua District in the year to September 2020. This compares with the ten year average of 934.

National overview

Car registrations recovered ground after lockdown, as pent up demand and a shift in spending patterns seeing a focus on vehicle sales. However, registrations in the September quarter were still 19% below registration levels last year. The momentum in car registrations is unlikely to continue, as job losses in the economy mount, the lack of international tourism reduces registrations of new rental cars, and potential constraints on the international supply of both new and used cars start to bite.

Commercial vehicle registrations



Highlights for Horowhenua District

- The number of commercial vehicles registered in Horowhenua District decreased by -2.0% in the year to September 2020 compared with the previous 12 months. Growth was higher than in New Zealand, where commercial vehicle sales decreased by -26.1%.
- A total of 294 commercial vehicles were registered in Horowhenua District in the year to September 2020. This is higher than the ten year annual average of 206.

National overview

Commercial vehicle registrations have recovered some ground from their sharp fall experienced during lockdown earlier this year. This recovery points to continued resilience in the primary sector, where demand for New Zealand's food products remains high, and in construction, where sharp growth in house prices is stimulating residential construction activity. Despite this recovery, commercial registrations remain considerably weaker than pre-pandemic, with commercial vehicle registrations in the September quarter still sitting 13% lower than a year ago.

Tourism Spending



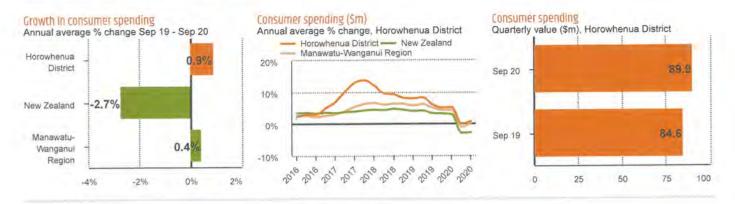
Highlights for Horowhenua District

- Total tourism expenditure in Horowhenua District decreased by 10.0% in the year to September 2020. This compares with a decrease
 of 16.5% in New Zealand.
- Total tourism expenditure was approximately \$91m in Horowhenua District during the year to September 2020, which was down from \$101m a year ago.

National overview

With New Zealand's borders remaining closed to all but essential travellers and returning citizens and residents, tourism expenditure continued to decline, falling 16.5% over the year to September 2020. This decline was despite relatively successful efforts to promote domestic tourism during the July school holidays. Auckland was the worst affected region, with visitor spending declining by 24% over the year to September 2020, partly as a result of the second lockdown in August. Other regions heavily affected include Otago (-21%) and the West Coast (-20%). Tourism spending figures are likely to continue this downward trend through the summer months, as the lack of international tourists becomes more acutely felt.

Consumer Spending



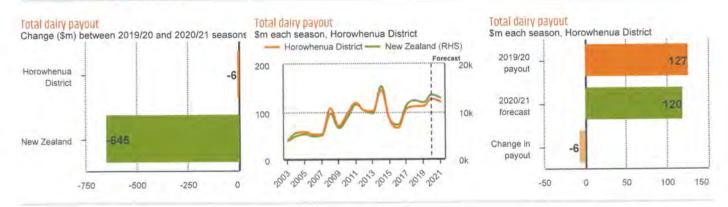
Highlights for Horowhenua District

Electronic card consumer spending in Horowhenua District, as measured by Marketview, increased by 0.9% over the year to September 2020 compared to the previous year. This compares with an decrease of -2.7% in New Zealand.

National overview

Consumer spending roared back into life after lockdown, growing 3.0%pa in the September 2020 quarter according to Marketview data. Declines in spending categories such as hospitality and accommodation were offset by growth in retail spending, particularly in the food and home improvement segments. Despite the impressive bounce back, considerable risk exists for spending to soften as the wage subsidy and COVID-19 Income Relief Payment benefit come to an end, and consumers feel the need to hold onto their wallets. The December quarter is expected to provide something of a litmus test for retailers – if spending levels hold up relatively well, it may relieve some of the pressure on employers to make further staff cuts in the new year.

Total dairy payout



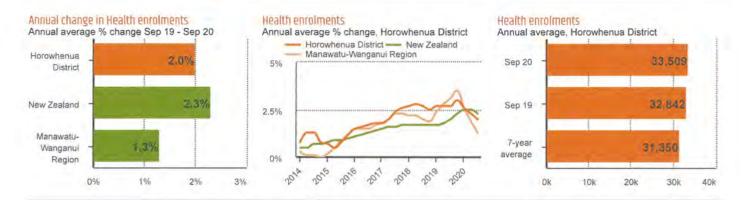
Highlights for Horowhenua District

- Horowhenua District's total dairy payout for the 2019/20 season is estimated to have been approximately \$127m.
- Horowhenua District's dairy payout for the 2020/21 season is expected to be approximately \$120m, \$6.02m lower than last season, assuming that production levels from last season are maintained.
- The total dairy payout for New Zealand is estimated to have been approximately \$13,537m in the 2019/20 season, and is expected to be \$645m lower in the 2020/21 season.

National overview

Primary sector performance remains robust, as New Zealand exports continue their solid run. Dairy export values since February remain up 3.8%pa, although activity weakened in September and through into October. Dairy won't escape the expected hit from COVID-19 but will weather the blow better. Fonterra has recently revised the midpoint milk price for the 2020/21 season to \$6.80/kgms off the back of stronger GlobalDairyTrade performances – a 40c lift from May's forecast. This rise in pay-out will bring an additional \$758m into the economy. However, the 2020/21 pay-out is lower than the pay-out last season, with a \$644m gap year-to-year.

Health Enrolments



Highlights for Horowhenua District

- The number of people enrolled with a primary health organisation in Horowhenua District in the year to September 2020 increased by 2.0% compared with the previous year. Growth was lower relative to New Zealand, where the number of enrolments increased by 2.3%.
- An average of 33,509 people were enrolled with primary healthcare providers in Horowhenua District in the 12 months ended September 2020. This compares with an average of 31,350 since the start of the series in 2013.

National overview

Population growth is slowing, with health enrolment figures rising at a slower pace of 2.3%pa over the 12 months to September 2020. Recent months have driven the deceleration in population growth, with total health enrolments in the September 2020 quarter up just 1.7%pa – the slowest since the end of 2018. The key driver of New Zealand's population growth – migration – has collapsed. Although there are a steady stream of people moving through Managed Isolation and Quarantine (MIQ) facilities, migration estimates from Stats NZ point towards a collapse in inward migration since COVID-19 forced New Zealand to close its borders. Net migration over the last six months has been just 2,513, compared to nearly 30,000 for the same period in 2019.

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Technical notes

Building Consents

Building consents data is sourced from Statistics New Zealand. The number of residential consents issued for new dwellings is the measure for residential consents. For non-residential consents, the measure is the value of both new buildings and alterations.

Consumer Spending

The consumer spending data is sourced from Marketview. It measures total electronic card spending using spending through the Paymark network and adding to it an estimate of non-Paymark network spending using the pattern of BNZ card holder spending at non-Paymark retailers. For further breakdown of the data by storetype and other variables contact Marketview.

Dairy

Dairy data has been sourced from the "New Zealand Dairy Statistics", a publication co-owned by DairyNZ and LIC, as well as calculations made by Infometrics. The data accords to dairy seasons, which run from June to May. Total dairy payouts in each territorial authority have been calculated by Infometrics by utilising milk solids production in conjunction with Fonterra's farmgate milk price (excluding dividends) from the dairy season in question. For the current season, Infometrics calculates a payout forecast using our own expectation of the farmgate milk price and the assumption that milk solids production continues running at the same level from the previous season.

Earnings

The earnings data comes from the quarterly Linked Employer Employee Data (LEED) published by Statistics New Zealand. LEED publishes the mean earnings of full quarter jobs for each quarter. Full quarter jobs may include full time and part time jobs. Earnings include overtime and lump sum payments. We sum the mean earnings for the four quarters making up the year to arrive at an estimate of average annual earnings. Infometrics projects average annual earnings to the current quarter using growth rates in industry earnings measured in the Labour Cost Index.

Gross Domestic Product

Gross Domestic Product is estimated by Infometrics. A top down approach breaks national industrial production (sourced from production based GDP measures published by Statistics New Zealand) is broken down to TA level by applying TA shares to the national total. Each TA's share of industry output is based on earnings data from LEED. GDP growth in recent quarters is based on a model which uses the various partial economic indicators presented in this report as inputs. Estimates of GDP for these most recent quarters are provisional until Infometrics updates its annual GDP series in the Regional Economic Profile at the beginning of each year. Gross domestic product is measured in 2019 dollar terms.

Health Enrolments

Health enrolments are sourced from the Ministry of Health. They record the number of people in each area who are enrolled with a Primary Health Organisation (PHO). Enrolment is voluntary, but most New Zealanders enrol at a general practice for health reasons and for the benefits of enrolment, such as cheaper doctors' visits and reduced costs of prescription medicines. Changes to how the Ministry of Health recorded this data led to Infometrics revising our approach to health enrolment figures for the March 2019 Quarterly Economic Monitor onwards. Our new approach completely revises our timeseries of health enrolments, so care should be taken when comparing the March 2019 report with previously downloaded reports.

Previously, the data provided was only for those people whose addresses are able to be accurately recorded by the Ministry of Health. We have now switched to breaking down TA-level health enrolments based on trends in stated health enrolments by area, to ensure that the total number of enrolees published in the Monitor align with the national-level figures published by the Ministry of Health. A new system for classifying and recording health enrolment addresses from March 2019 onwards by the Ministry means significantly higher numbers of unallocated enrolees, resulting in the need to review our model.

House Sales

The number of house sales is sourced from REINZ. The indicator measures the number of house sales at the point when the sale becomes unconditional. The unconditional date is the date when all the terms of an agreement have been satisfied and the sale and purchase can proceed to settlement.

House Values

House value (dollar value) are sourced from QVNZ. The levels quoted in the report are average current values over the past 12 months . An average current value is the average (mean) value of all developed residential properties in the area based on the latest house value index from QVNZ. It is not an average or median sales price, as both of those figures only measure what happens to have sold in the period. These average current values are affected by the underlying value of houses (including those not on the market) and are quality adjusted based on the growth in each house's price between sales.

Jobseekers Support

In July 2013 the New Zealand's welfare system changed to better recognise and support people's work potential. As part of this the Jobseekers Support benefit was introduced. This benefit is for people who can usually look or prepare for work but also includes people who can only work part-time or can't work at the moment, for example, because they have a health condition, injury or disability.

Tourism Expenditure

Tourism expenditure data is sourced from the Ministry of Business, Innovation and Employment's (MBIE) Monthly Regional Tourism Estimates. These are estimated values for tourism spending that approximate values found in the International Visitor Survey (IVS) and Tourism Satellite Account (TSA), using modelling of a sample of electronic card spending throughout New Zealand from domestic and international accounts.

Traffic Flow

Traffic flow growth rates are calculated from the number of vehicles passing approximately 110 sites monitored by New Zealand Transport Agency. Each of the sites has been mapped to a territorial authority.

Unemployment

Regional level unemployment rates are sourced from Statistics New Zealand's Household Labour Force Survey. Trends in the number of Jobseekers are used to break down regional unemployment rates to TA levels. The TA level unemployment rates are benchmarked on census following the release of each census. To reduce volatility the unemployment rate is presented as an average for the last four quarters.

Vehicle Sales

Car and commercial vehicle sales data are sourced from New Zealand Transport Authority. Sales are based on new registrations which include the first time registration of new vehicles and used vehicles imported from overseas.

Household Income

The Infometrics household income series is a comprehensive estimate of household incomes within each territorial authority area. The series captures labour market earnings (wages, salaries and self-employment) as well as allowances (e.g. Disability Allowance), benefits (e.g. Jobseeker Support) and superannuation. Investment income is excluded. Infometrics models the series with a top-down approach, first measuring all incomes received by households in New Zealand, then apportioning them to territorial authorities using various sources of administrative data. As there is a time lag in the availability of administrative data we use contemporary indicators to project our estimates to the most recent quarter. Infometrics estimates of the number of occupied private households are used to translate total income in each territorial authority area into a per household mean. Mean household incomes are then translated into median household incomes using a Pareto distribution. The Infometrics household income series tends to be slightly higher than Census measures. Census tends to underestimate household incomes because individuals often fail to recall all of their income when completing their Census form.

Weekly Rents

Rents (\$ per week) are averaged across the quarter in question from monthly rental data sourced from MBIE. Rental data pertains to averages from data collected when bonds are lodged and does not control for specifications of the home (eg. size, number of bedrooms, age of home, etc).



Quarterly Economic Monitor

Horowhenua District March 2020

Overview of Horowhenua District

The Horowhenua economy grew by 3.0% over the year to March 2020 according to Infometrics provisional estimates. Although the growth rate is off its peak of 4.4% at the end of 2018 the economy is in good shape as it heads into the impending COVID-19 induced recession.

The health of the local economy is reflected in strong consumer spending growth in Horowhenua of 5.3% over the year to March 2020, compared with 3.0% in the national economy. Growth has been aided by strong employment growth in the district. The unemployment rate averaged 5.5% over the year to March 2020 which was the lowest rate in more than a decade. The number of Job Seeker Support recipients climbed by 8.8% which reflects an easing in conditions to receive a benefit, rather than the state of the labour market.

Spending growth has also been supported by a strong primary sector, with an additional \$17m expected from the 19/20 dairy pay-out in Horowhenua this season. Meat prices have also held at high levels.

Horowhenua's housing market is very buoyant. Strong growth in demand, and a lack of supply, have pushed the average house value up by 18.4% over the year to March 2020. The average house value is now above \$410,000 and housing affordability has been steadily declining despite falling interest rates.

The New Zealand economy will deteriorate markedly over the coming year due to COVID-19, with Infometrics forecasting GDP to fall by 8.0% and employment to fall by 9.8% over the year to March 2021. Horowhenua will be less hard hit than many districts. The district has a large primary sector and primary exports are holding up. Food consumption will continue through the recession and the district has a sizeable food manufacturing sector. Finally, Horowhenua is not highly exposed to international tourism and education, both of which will be knocked hard by the pandemic.

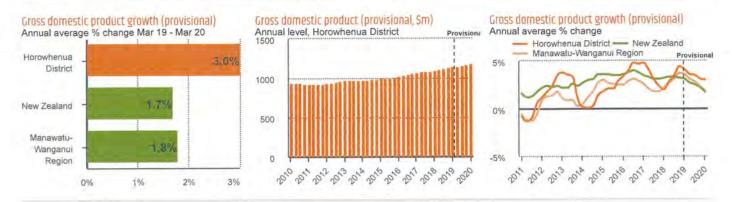
Indicator	Horowhenua District		Manawatu-Wanganui Region		New Zealand		
Annual average % change							
Gross domestic product	4	3.0%	•	1.8%	4	1.7%	
Traffic flow	4	0.05%	4	-0.5%		-0.2%	
Health Enrolments	4	2.6%	4	2.6%	4	2.5%	
Consumer spending	4	5.3%	4	4.4%	-	3.0%	
Residential consents	4	-11.7%	4	-1.4%	^	9.0%	
Non-residential consents	-	230%	4	6.9%	4	-0.4%	
House prices*	-	18.4%	4	17.1%	4	5.9%	
House sales	-	0.1%	4	-5.4%	•	2.0%	
Tourism expenditure	4	-0.4%	4	0.1%		1.4%	
Car registrations	4	-8.6%	4	-10.5%	4	-11.5%	
Commercial vehicle registrations	1	-6.1%	4	-10.3%	4	-12.8%	
Jobseeker Support recipients	•	8.8%	•	6.5%	•	11.7%	
evel							
Unemployment rate		5.5%		4.6%		4.1%	

^{*} Annual percentage change (latest quarter compared to a year earlier)

Overview of national economy

The COVID-19 pandemic has upended the economy and plunged New Zealand into the sharpest recession in living memory. The March quarter includes the full progression of the virus, from its origins in China and subsequent hit to New Zealand exports, through to border closures forcing lower tourism arrivals, before culminating in the lockdown of New Zealand under Alert Level 4. Our March 2020 Quarterly Economic Monitor only captures the initial economic effects of putting the New Zealand economy on life support. The June Monitor will better reflect activity changes. No sector of the economy will be spared, with the regional impacts dependant on the local economic structure – Infometrics is now forecasting the loss of 250,000 jobs nationally over the next year, followed by a long period of restructuring the economy.

Gross domestic product (provisional)



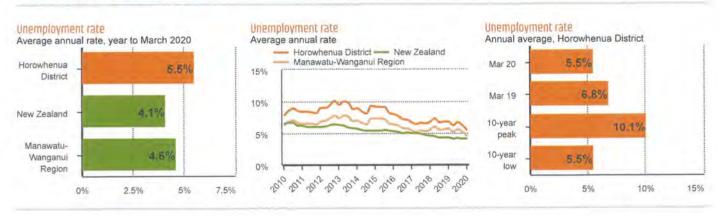
Highlights for Horowhenua District

- GDP (provisional) in Horowhenua District was up 3.0% for the year to March 2020 compared to a year earlier. Growth was higher than in New Zealand (1,7%) and higher than in Manawatu-Wanganui Region (1,8%).
- GDP (provisional) was \$1,179 million in Horowhenua District for the year to March 2020 (2010 prices).
- Annual GDP growth in Horowhenua District peaked at 4.8% in the year to September 2016.

National overview

Economic activity dropped significantly in the March 2020 quarter, with lower tourism and trade activity over the first two months of the quarter combining with a collapse in activity at the end of March. Infometrics provisional estimates point towards a 0.6% contraction in activity from the December quarter, taking economic growth over the 12 months to March 2020 to 1.7%pa. Lower tourism activity, softer freight volumes, and empty construction sites were key drivers of the decline, with unsurprisingly stronger government administration activity keeping activity from dropping lower. With the Level 4 lockdown only captured in the last 6 days of March, estimates for June will be far more dire.

Unemployment rate



Highlights for Horowhenua District

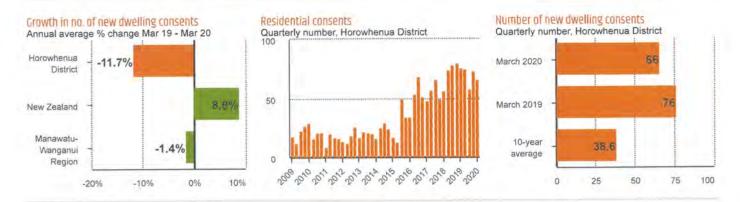
- The annual average unemployment rate in Horowhenua District was 5.5% in March 2020, down from 6.8% a year earlier.
- The unemployment rate in Horowhenua District was higher than in New Zealand, where the unemployment rate averaged 4.1% over the year to March 2020.
- Over the last ten years the unemployment rate reached a peak of 10.1% in December 2012;

National overview

2

Unemployment remained low at an annual average rate of 4.1% for the March 2020 year. The March quarter saw rises in both full-time and part-time work compared with the same quarter a year earlier. However, labour market tightness is unlikely to persist. The COVID-19 pandemic and government's containment measures, such as closing New Zealand's borders and implementing an economic lockdown, will cause a sharp shock to New Zealand's short-term growth prospects. The coming recession will result in immediate job losses that will materialise in the June 2020 quarter results. With the knock-on effects of the lockdown reaching almost every sector of the economy, we are forecasting the unemployment rate to rise to 9.0% in the March 2021 year.

Residential consents



Highlights for Horowhenua District

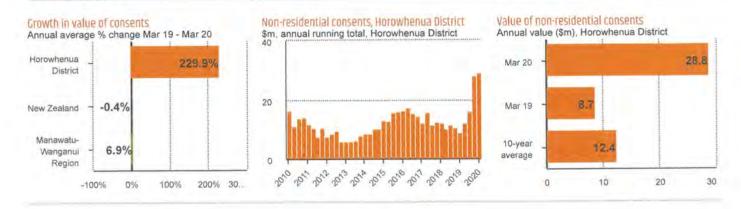
- A total of 66 new residential building consents were issued in Horowhenua District in the March 2020 quarter, compared with 76 in the same quarter last year.
- On an annual basis the number of consents in Horowhenua District decreased by 11.7% compared with the same 12-month period a year ago. The number of consents in New Zealand increased by 9.0% over the same period.

National overview

Residential building consents grew by 9.0% in the year to March 2020, and growth was starting to ease as consents reached a plateau level.

However, due to COVID-19 we expect extreme levels of uncertainty among both businesses and households to drive consents lower throughout the rest of 2020 and 2021. We also believe that some confidence effects are already apparent in data for the month of March.

Non-residential consents



Highlights for Horowhenua District

- Non-residential building consents to the value of \$29 million were issued in Horowhenua District during the year to March 2020.
- The value of consents increased by 230% over the year to March 2020. By comparison the value of consents in New Zealand decreased by -0.4% over the same period.
- Over the last 10 years, consents in Horowhenua District reached a peak of \$29 million in the year to March 2020.

National overview

3

The value of non-residential consents notched back by 0.4% in the year to March 2020, driven down by a very soft result for the month of March. While COVID-19 will have some influence on March, this represents a broader slowing down of non-residential consents which has been in motion for some time.

With a weak economic outlook due to COVID-19, consents will fall further in future months. Furthermore, previously consented projects in badly hit sectors, such as retail and accommodation, may not proceed. Public sector activity remains strong, and recently announced funding for education and hospital construction may help to shore up overall levels of activity.

Traffic flow



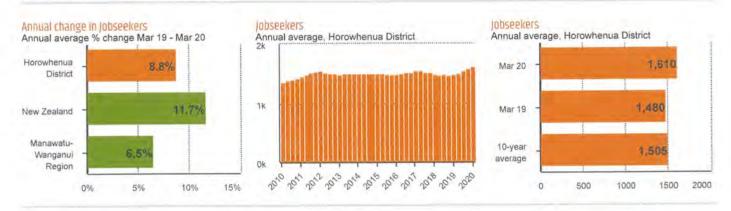
Highlights for Horowhenua District

 Traffic flows in Horowhenua District increased by 0.05% over the year to March 2020. This compares with an decrease of -0.2% in New Zealand.

National overview

Transport activity declined by 0.1%pa over the 12 months to March 2020, reversing the slightly faster pace of traffic activity over the December 2019 year. Daily traffic flow analysis shows that transport activity across the country drifted lower throughout February, with lower tourism numbers combining with fewer freight movements. However, the immediate move to Level 3 on 23 March saw traffic volumes drop 15% from volumes on March 1. The Level 4 lockdown saw traffic flows on the last day of March at just a quarter (26%) of usual traffic levels. Heavy traffic flows held up better, operating at around 60% of normal levels on the last day of March. Lower consumption is set to keep traffic volumes subdued even as the economy reopens.

Jobseekers



Highlights for Horowhenua District

- Working age Jobseeker Support recipients in Horowhenua District in the year to March 2020 increased by 8.8% compared with the previous year. Growth was lower relative to New Zealand, where the number of Jobseeker Support recipients increased by 11.7%.
- An average of 1,610 people were receiving a Jobseeker Support benefit in Horowhenua District in the 12 months ended March 2020. This compares with an average of 1,505 since the start of the series in 2010.

National overview

Job losses have already started to filter through to the economy, with the number of Jobseeker Support recipients increasing by around 4,300 at the end of March 2020 compared to the end of December 2019. Jobseeker numbers are now up nearly 12%pa on average over the 12 months to March 2020, and only capture the start of the rise of unemployment across the economy. Since the end of March, 35,000 additional people have been added to the Jobseeker Support benefit. Young people, who already had a higher unemployment rate, are bearing the brunt of job losses, with a 57% increase in Jobseeker Support Work Ready recipients aged under 30 in April compared to February, compared to a 35% rise in recipients aged 30-64.

House prices



Highlights for Horowhenua District

- The average current house value in Horowhenua District was up 18.4% in March 2020 compared with a year earlier. Growth outperformed relative to New Zealand, where prices increased by 5.9%.
- The average current house value was \$412,316 in Horowhenua District over the March 2020 year. This compares with \$714,174 in New Zealand.

National overview

House prices were up by 9.3% across the country over the year to March 2020. All regions were up, with Auckland recording its fastest growth in three years (8.2%pa). House price growth was spurred on by successive cuts to interest rates throughout 2019.

House prices are forecast to fall significantly between now and the end of 2021, although declines in the near-term are likely to be kept in check by the government's mortgage holiday scheme that will limit the number of forced sales taking place.

House sales



Highlights for Horowhenua District

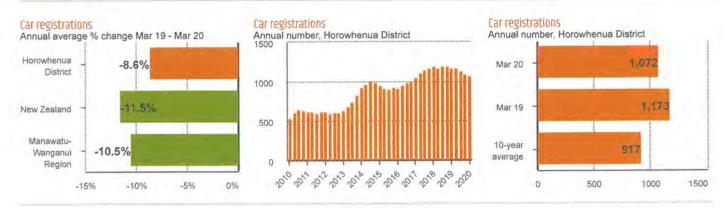
- House sales in Horowhenua District in the year to March 2020 increased by 0.1% compared with the previous year. Growth underperformed relative to New Zealand, where sales increased by 2.0%.
- A total of 710 houses were sold in Horowhenua District in the 12 months ended March 2020. This compares with the ten year average of 626.

National overview

House sales across New Zealand fell by 12% in the year to March 2020. Sales picked up through the latter half of 2019 in response to cuts in interest rates, however this growth was unpicked by a soft month of March as the Level 4 lockdown began to bite.

We expect house sales to drop over the coming year, with limited numbers of buyers in the market due to the economic fallout from the COVID-19 pandemic. However, the forecast declines in house prices might entice some buyers into the market in the second half of 2021.

Car registrations



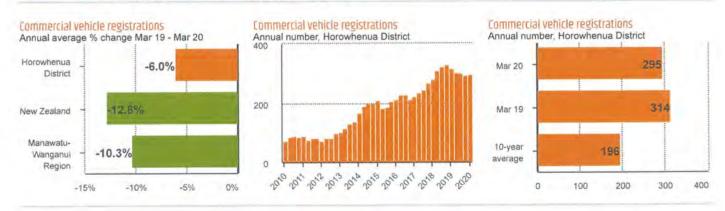
Highlights for Horowhenua District

- The number of cars registered in Horowhenua District decreased by -8.6% in the year to March 2020 compared with the previous 12 months. Growth was higher than in New Zealand, where car sales decreased by -11.5%.
- A total of 1,072 cars were registered in Horowhenua District in the year to March 2020. This compares with the ten year average of 917.

National overview

Car registrations continue to decline, falling 11.5% in the March 2020 year. The downturn in car registrations reflects a weakening economic tapestry of slowing population growth, softening employment growth and subdued consumer confidence. Trading restrictions under Alert Level 3 then Level 4 in late March didn't help either. The softening car market was reflected in falling registrations across both new and used cars and, within these two markets, across both large and small vehicles. The outlook for the car market is dire. Further trading restrictions in April and May will make for a difficult June quarter. With the economy expected to contract 8.0% in the March 2021 year, and unemployment set to hit 9.0% over the same period, consumers' will be unwilling to make major purchases for the foreseeable future.

Commercial vehicle registrations



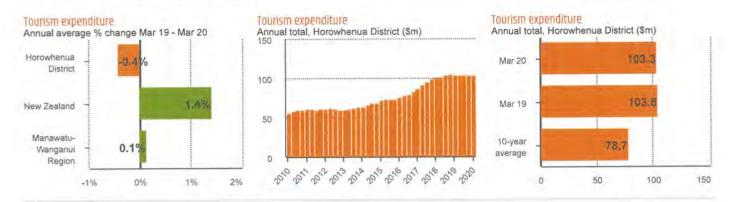
Highlights for Horowhenua District

- The number of commercial vehicles registered in Horowhenua District decreased by -6.1% in the year to March 2020 compared with the previous 12 months. Growth was higher than in New Zealand, where commercial vehicle sales decreased by -12.8%.
- A total of 295 commercial vehicles were registered in Horowhenua District in the year to March 2020. This is higher than the ten year annual average of 196.

National overview

Commercial vehicle registrations continued to fall, dropping 13% in the March 2020 year as softening economic growth and weakening residential construction activity continued to sap businesses' willingness to invest in either light, medium or very heavy commercial vehicles. Looking forwards, with the economy coming almost to a standstill during Alert Levels 4 and 3, freight firms' profitability will be under pressure. Commercial vehicle registrations will decline further in the coming year as a forecast 8.0% contraction in the economy in the March 2021 year sends construction activity and consumer spending into freefall. Export volumes are also expected to come under stern downward pressure as the global economy enters recession.

Tourism Spending



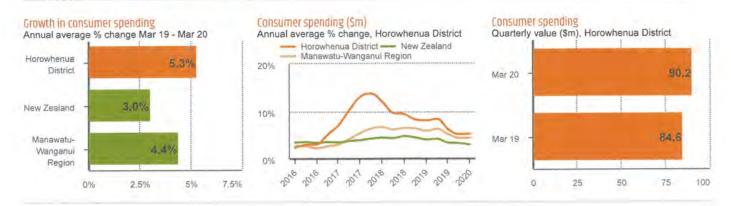
Highlights for Horowhenua District

- Total tourism expenditure in Horowhenua District decreased by 0.4% in the year to March 2020. This compares with an increase of 1.4% in New Zealand.
- Total tourism expenditure was approximately \$103m in Horowhenua District during the year to March 2020, which was down from \$104m a year ago.

National overview

Tourism spending growth over the 12 months to March 2020 dropped markedly, from above 3%pa over 2019 to just 1.4%pa over the March 2020 year. Spending in the March 2020 month alone was down 29% from last March. Tourist arrivals dropped 54%pa in the March quarter, with progressively more restrictive border controls throughout the quarter. Infometrics' working assumption is that the borders will remain closed until the end of the year, although an earlier opening of a trans-Tasman bubble provides some upside risk. Our forecasts currently expect a 91% drop in international tourism activity, and a 21% drop in domestic activity, as lower household incomes and other factors restrain travel.

Consumer Spending



Highlights for Horowhenua District

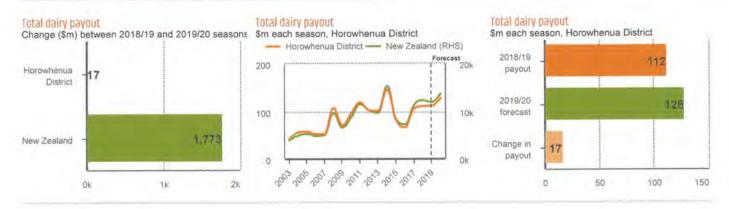
Electronic card consumer spending in Horowhenua District, as measured by Marketview, increased by 5.3% over the year to March 2020 compared to the previous year. This compares with an increase of 3.0% in New Zealand.

National overview

Consumer spending grew by a relatively modest 3.0% in the year to March 2020, with the rate of growth steadily easing since 2018. Spending in the March month was 4.5%pa lower after wild spending swings. Panic buying pushed spending levels up 24%pa on the day before Level 4 lockdown commenced, before quickly falling away over the rest of March, with spending down 63%pa.

Consumer spending will deteriorate substantially over the coming quarters, initially due to the lockdown period limiting consumers ability to spend, and subsequently due to a loss of consumer confidence as households face real or perceived concerns around job losses. With New Zealand's borders closed, the forecast decline in migration will reinforce this downward trend.

Total dairy payout



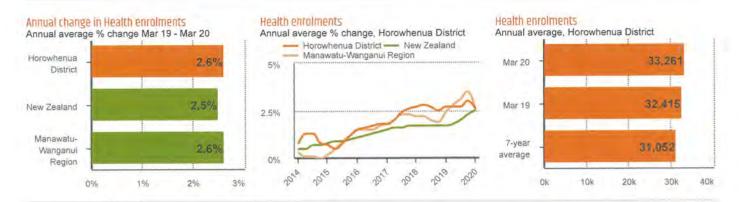
Highlights for Horowhenua District

- Horowhenua District's total dairy payout for the 2018/19 season is estimated to have been approximately \$112m.
- Horowhenua District's dairy payout for the 2019/20 season is expected to be approximately \$128m, \$16.6m higher than last season, assuming that production levels from last season are maintained.
- The total dairy payout for New Zealand is estimated to have been approximately \$11,964m in the 2018/19 season, and is expected to be \$1,773m higher in the 2019/20 season.

National overview

Expectations for the dairy sector have softened, with dual issues putting the primary sector under pressure. Drought conditions continue to present a substantial challenge for regional communities, with feed both less accessible and more expensive to access. The COVID-19 pandemic has also put dairy prices under pressure. Infometrics is still using the midpoint of Fonterra's \$7.00-\$7.60/kgms pay-out in our estimates, but our internal expectations point towards a pay-out at the lower end of this range, at around \$7.05/kgms. A decline from \$7.30/kgms to \$7.05/kgms would reduce the national pay-out by around \$470m. Our early estimate for the 2021 season is currently tracking at \$6.15/kgms, although there is significant uncertainty. Dairy prices have firmed in recent weeks as Asian demand rebounds, and dairy export values remain above 2019 levels.

Health Enrolments



Highlights for Horowhenua District

- The number of people enrolled with a primary health organisation in Horowhenua District in the year to March 2020 increased by 2.6% compared with the previous year. Growth was higher relative to New Zealand, where the number of enrolments increased by 2.5%.
- An average of 33,261 people were enrolled with primary healthcare providers in Horowhenua District in the 12 months ended March 2020. This compares with an average of 31,052 since the start of the series in 2013.

National overview

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Health enrolments continue to grow, with both a rise in the current population and a new health issue contributing to better coverage of the population. Growth in health enrolments advanced to 2.5%pa over the 12 months to March 2020, up from 2.3%pa in December. After slowing in recent quarters as net migration levels held steady, national population growth jumped to 2.0%pa, from a revised 1.7%pa in December. We expect that health enrolment could continue to rise in future quarters even if population growth slows in line with our expectations, with the current environment making it more likely for people to enrol for health services because of COVID-19 and ability to access cheaper healthcare if enrolled.

Downloded: 21 May 2020

Technical notes

Building Consents

Building consents data is sourced from Statistics New Zealand. The number of residential consents issued for new dwellings is the measure for residential consents. For non-residential consents, the measure is the value of both new buildings and alterations.

Consumer Spending

The consumer spending data is sourced from Marketview. It measures total electronic card spending using spending through the Paymark network and adding to it an estimate of non-Paymark network spending using the pattern of BNZ card holder spending at non-Paymark retailers. For further breakdown of the data by storetype and other variables contact Marketview.

Dairy

Dairy data has been sourced from the "New Zealand Dairy Statistics", a publication co-owned by DairyNZ and LIC, as well as calculations made by Infometrics. The data accords to dairy seasons, which run from June to May. Total dairy payouts in each territorial authority have been calculated by Infometrics by utilising milk solids production in conjunction with Fonterra's farmgate milk price (excluding dividends) from the dairy season in question. For the current season, Infometrics calculates a payout forecast using our own expectation of the farmgate milk price and the assumption that milk solids production continues running at the same level from the previous season.

Earnings

The earnings data comes from the quarterly Linked Employer Employee Data (LEED) published by Statistics New Zealand, LEED publishes the mean earnings of full quarter jobs for each quarter. Full quarter jobs may include full time and part time jobs. Earnings include overtime and lump sum payments. We sum the mean earnings for the four quarters making up the year to arrive at an estimate of average annual earnings. Infometrics projects average annual earnings to the current quarter using growth rates in industry earnings measured in the Labour Cost Index.

Gross Domestic Product

Gross Domestic Product is estimated by Infometrics. A top down approach breaks national industrial production (sourced from production based GDP measures published by Statistics New Zealand) is broken down to TA level by applying TA shares to the national total. Each TA's share of industry output is based on earnings data from LEED. GDP growth in recent quarters is based on a model which uses the various partial economic indicators presented in this report as inputs. Estimates of GDP for these most recent quarters are provisional until Infometrics updates its annual GDP series in the Regional Economic Profile at the beginning of each year. Gross domestic product is measured in 2019 dollar terms.

Health Enrolments

Health enrolments are sourced from the Ministry of Health. They record the number of people in each area who are enrolled with a Primary Health Organisation (PHO). Enrolment is voluntary, but most New Zealanders enrol at a general practice for health reasons and for the benefits of enrolment, such as cheaper doctors' visits and reduced costs of prescription medicines. Changes to how the Ministry of Health recorded this data led to Infometrics revising our approach to health enrolment figures for the March 2019 Quarterly Economic Monitor onwards. Our new approach completely revises our timeseries of health enrolments, so care should be taken when comparing the March 2019 report with previously downloaded reports.

Previously, the data provided was only for those people whose addresses are able to be accurately recorded by the Ministry of Health. We have now switched to breaking down TA-level health enrolments based on trends in stated health enrolments by area, to ensure that the total number of enrolees published in the Monitor align with the national-level figures published by the Ministry of Health. A new system for classifying and recording health enrolment addresses from March 2019 onwards by the Ministry means significantly higher numbers of unallocated enrolees, resulting in the need to review our model.

House Sales

The number of house sales is sourced from REINZ. The indicator measures the number of house sales at the point when the sale becomes unconditional. The unconditional date is the date when all the terms of an agreement have been satisfied and the sale and purchase can proceed to settlement.

House Values

House value (dollar value) are sourced from QVNZ. The levels quoted in the report are average current values over the past 12 months . An average current value is the average (mean) value of all developed residential properties in the area based on the latest house value index from QVNZ. It is not an average or median sales price, as both of those figures only measure what happens to have sold in the period. These average current values are affected by the underlying value of houses (including those not on the market) and are quality adjusted based on the growth in each house's price between sales.

Jobseekers Support

In July 2013 the New Zealand's welfare system changed to better recognise and support people's work potential. As part of this the Jobseekers Support benefit was introduced. This benefit is for people who can usually look or prepare for work but also includes people who can only work part-time or can't work at the moment, for example, because they have a health condition, injury or disability.

10 Downloded: 21 May 2020

Tourism Expenditure

Tourism expenditure data is sourced from the Ministry of Business, Innovation and Employment's (MBIE) Monthly Regional Tourism Estimates. These are estimated values for tourism spending that approximate values found in the International Visitor Survey (IVS) and Tourism Satellite Account (TSA), using modelling of a sample of electronic card spending throughout New Zealand from domestic and international accounts.

Traffic Flow

Traffic flow growth rates are calculated from the number of vehicles passing approximately 110 sites monitored by New Zealand Transport Agency. Each of the sites has been mapped to a territorial authority.

Unemployment

Regional level unemployment rates are sourced from Statistics New Zealand's Household Labour Force Survey. Trends in the number of Jobseekers are used to break down regional unemployment rates to TA levels. The TA level unemployment rates are benchmarked on census following the release of each census. To reduce volatility the unemployment rate is presented as an average for the last four quarters.

Vehicle Sales

Car and commercial vehicle sales data are sourced from New Zealand Transport Authority. Sales are based on new registrations which include the first time registration of new vehicles and used vehicles imported from overseas.



Submission 15 - Vivienne Bold



SUBMISSION FORM: Proposed Plan Change 5: Waitārere Beach Growth Area.

Horowhenua District Plan (2015)
Resource Management Act 1991
Form 5 of Resource Management (Forms, Fees, Procedure) Regulations 2003

Pos Lev Fax	livered to: Horowhenua District Council Offices, 126 Oxford Street, Levin sted to: Strategic Planning, Horowhenua District Council, Private Bag 4002, vin 5540 ked to: (06) 366 0983 mailed to: districtplan@horowhenua.govt.nz
Submiss	sions must be received no later than 4pm Tuesday 27th April 2021.
	u must fill in all sections of this form.
1. Sul	bmitter Contact Details
Name	of Organisation: (If on behalf of an Organisation)
Addres	s for Service: 155 Martere Roads Post code: 5571
Teleph	one (Day time): Mobile 22.7431.5181
100	
2. Tra	de Competition
I could	gain an advantage in trade competition through this submission: Yes No
(a) adv	rectly affected by an effect of the subject matter that: ersely affects the environment; and s not relate to trade competition or the effects of trade competition: Yes No
submiss	note that if you are a person who could gain an advantage in trade competition through the sion, your right to make a submission may be limited by Clause 6 of Schedule 1 of the see Management Act 1991.
3. The	specific provisions of the Plan Change that my submission relates to
are as	follows: (Please specify the Policy, Rule or Map reference your submission relates
See.	Stratgic or lack of Planning Lat us to have gone into this Change 5 Plan
	(Continue on a separate sheet if necessary)



4. My submission is that: (Clearly state whether you SUPPORT parts of the Proposed Plan Change, giving reasons for your views)	or OPPOS	E specific
The Evosian on Sections that se Too dose to the Sea - Spring Spring Tides From Trades Its a Urupa - (Continue on a sepa	eus t Tide - k a is l arate sheet i	log love f necessary)
5. I/We seek the following decision from the Horowhenua (Give details of what amendments you wish to see and your reasons	s, be specific	c)
Don't Sell this land chapter Developers	1 70	
(Continue on a sepa	arate sheet i	f necessary)
6. Proposed Plan Change Hearing	i.	7-31
Do you wish to speak in support of your submission at the hearing?	Yes 🖾	No 🗆
If others make a similar submission would you be prepared to consider case at the hearing? Yes \Box No \Box	der presentii	ng a joint
Would you like to make your verbal submission in Te Reo Māori?	Yes □	No 🛮
Sign language interpretation required?	Yes □	No 🗹
I have attached additional pages to this submission.		,
Signature of Submitter: Beld Da (Or person authorised to sign on behalf of submitter)	te: 1/5/	2021

Privacy Act 1993
Please note that submissions are public information. Information on this form including your name and submission will be accessible to the media and public as part of the decision making process. Council is required to have this by the Resource Management Act 1991. Your contact details will only be used for the purpose of the Plan Change process. The information will be held by the Horowhenua District Council, 126 Oxford Street, Levin. You have the right to access the information and request its correction.