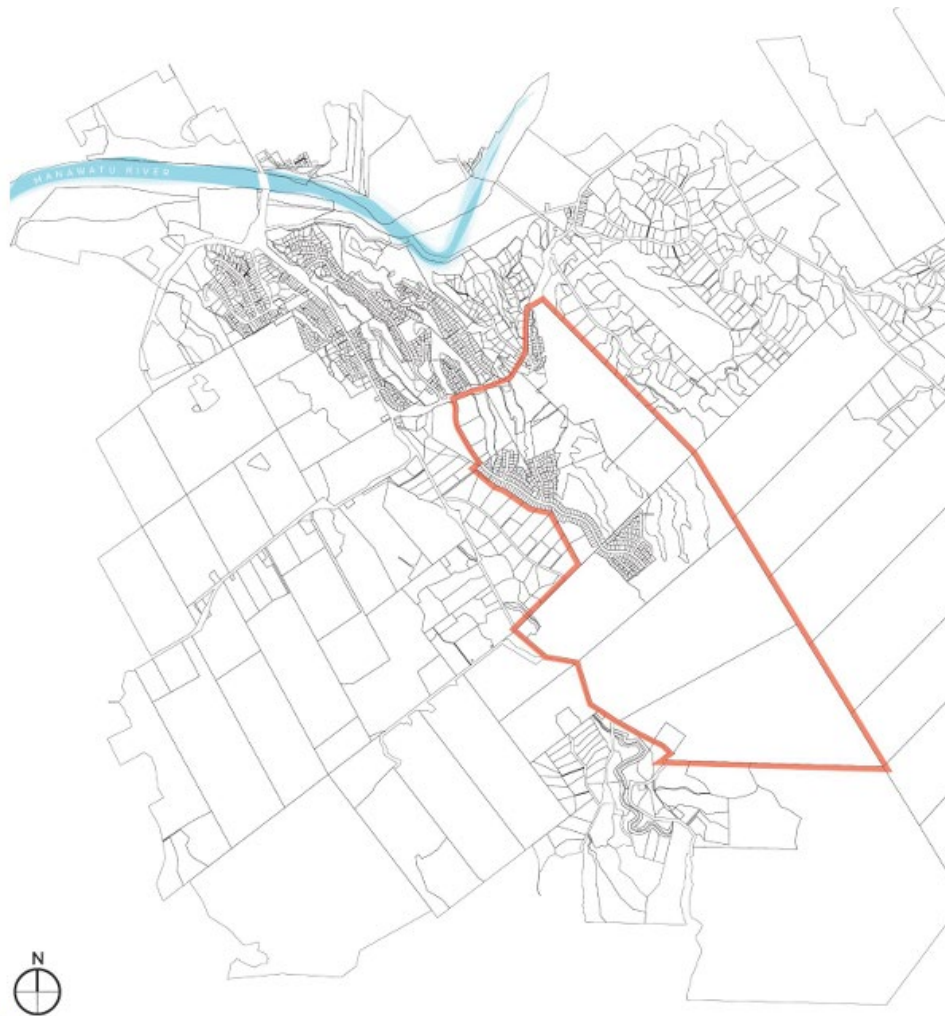


Decision of Independent Hearing Panel

PLAN CHANGE G AOKAUTERE GROWTH AREA

**REZONING OF RURAL LAND TO RESIDENTIAL ZONE, LOCAL BUSINESS
ZONE AND CONSERVATION AND AMENITY ZONE**



**Decision Report of the Independent Hearing Panel
appointed by the Palmerston North City Council
pursuant to section 34A of the Resource Management Act 1991**

6 May 2024

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SCHEDULE OF APPENDICES

- [APPENDIX 1: Panel decisions on relief sought by submissions and further submissions](#)
- [APPENDIX 2: Annotated version of Plan Change provisions](#)

INDEX OF ABBREVIATIONS

This report utilises the abbreviations and acronyms set out in the glossary below:

Abbreviation	Means...
"the Act"	Resource Management Act 1991
"AEP"	Annual exceedance probability
"ARI"	Annual recurrence interval
"the Council"	Palmerston North City Council
"CIA"	Cultural Impact Assessment
"the District Plan"	Operative Palmerston North City District Plan 2019
"JWS"	Joint witness statement(s)
"NES-CS"	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
"NES-FW"	National Environmental Standards for Freshwater 2020
"NPS-FM"	National Policy Statement for Freshwater Management 2020
"NPS-HPL"	National Policy Statement for Highly Productive Land 2022
"NPS-IB"	National Policy Statement for Indigenous Biodiversity 2023
"NPS-UD"	National Policy Statement on Urban Development 2020
"NZCPS"	New Zealand Coastal Policy Statement 2010
"the One Plan"	Combined Regional Policy Statement, Regional Plan and Regional Coastal Plan for Manawatū-Whanganui
"the Plan Change" or "PCG"	Plan Change G: Aokautere Growth Area
"PNCC"	Palmerston North City Council
"PNIRD"	Palmerston North Industrial and Residential Developments Ltd
"PNITI"	Palmerston North Integrated Transport Initiative
"the Regional Council"	Horizons Regional Council
"the RMA"	Resource Management Act 1991
"the RPS"	The Regional Policy Statement for the Manawatū-Whanganui Region
"s[#]"	Section Number of the RMA, for example s32 means section 32
"Section 42A Report"	The report prepared by PNCC pursuant to s42A, RMA
"SSA"	Safe System Audit
"SNA"	Significant Natural Area(s)
"TA Report"	Transportation Assessment
"the Plan Change area"	Approximately 454 hectares of land between the foothills of the Ruahine/Tararua Ranges and the south bank of the Manawatū awa, bounded by Turitea Valley to the west, Moonshine Valley to the east, and the existing built-up areas of Aokautere to the north – the subject of this Plan Change

Palmerston North City Council
Plan Change G – Aokautere Growth Area
Rezoning of rural land to Residential Zone, Local Business Zone and
Conservation and Amenity Zone

Decision of the Independent Hearing Panel

Proposal Description:

Plan Change G relating to the Palmerston North City Plan:
Rezoning of rural land to Residential Zone, Local Business Zone and Conservation and Amenity Zone

Hearing Panel:

DJ McMahon – Independent Hearing Commissioner, Chair
S McGarry – Independent Hearing Commissioner
Councillor L Johnson – Sitting as an Independent Hearing Commissioner

Date of Hearing:

4, 5, 6, 7 and 8 December 2023

Hearing Officially closed:

16 April 2024

1. INTRODUCTION

Report purpose

- 1.1 This report sets out our decision on Plan Change G to the operative Palmerston North City District Plan 2019 (the District Plan), relating to the Aokautere Growth Area.
- 1.2 We were appointed¹ by Palmerston North City Council (the Council) to hear submissions made on the Plan Change and to consider and make a decision under delegated authority of the Council under section 34A of the Resource Management Act 1991 (the RMA) as to whether the Plan Change should be declined, approved or approved with amendments.
- 1.3 In summary, the Plan Change (as notified) seeks to:
- a. rezone a new greenfield growth area to the south-east of Palmerston North at Aokautere for residential development; and

¹ Commissioner DJ McMahon was appointed by the Council on 3 November 2021 and confirmed by letter dated 9 September 2021 as an independent commissioner to chair a series of District Plan Change Hearings on behalf of the Council as and when required, in relation to the District Plan Changes proposed by the Council over the 2022-24 period. Commissioner S McGarry was similarly appointed and assigned by the Council on 14 June 2023 by decision of Council and confirmed by letter dated 6 July 2023 as an independent commissioner to sit on hearing panel on behalf of the Council as and when required, in relation to the District Plan Changes proposed by the Council over the same period. Councillor L Johnson was assigned as commissioner to the hearing panel by PNCC Legal Counsel in letters dated 18 July and 25 July 2023. Her appointment is set out in the Delegations Manual (3.4.3) by lieu of being an elected member with Making Good Decisions accreditation.

- b. insert an accompanying structure plan and provisions (objectives, policies, and rules) into the District Plan.
- 1.4 We will canvass the Plan Change's background in due course. It has been the subject of a Section 32 Report², consultation with stakeholders, landowners and the community, and, of course, the public notification and hearing process, culminating in our decision.
- 1.5 Before setting out the details of the Plan Change, the submissions to it and our substantive evaluation, there are some procedural matters that we will address, beginning with our role as an Independent Hearing Panel.

Role and report outline

- 1.6 As noted above, our role is to make a decision about the outcome of the Plan Change on the Council's behalf. The authority delegated in us by the Council includes all necessary powers under the RMA to hear and decide on the submissions received on the Plan Change.
- 1.7 The purpose of this report is to satisfy the Council's various decision-making obligations and associated reporting requirements under the RMA.
- 1.8 Having familiarised ourselves with the Plan Change and its associated background material, read all submissions, conducted the site/locality visits and hearing, we hereby record our decision.
- 1.9 In this respect, our report is broadly organised into the following two parts:

- a. Factual context for the Plan Change:

This non-evaluative section (comprising **Section 2** in this report) is largely factual and contains an overview of the land subject to the Plan Change and an outline of the background to the Plan Change and the relevant sequence of events. It also outlines the main components of the Plan Change as notified. This background section provides relevant context for considering the issues raised in submissions to the Plan Change. Here, we also briefly describe the submissions received to the Plan Change and provide a summary account of the hearing process itself and our subsequent deliberations. We also consider here various procedural matters about the submissions received.

- b. Evaluation of key issues:

The second part of our report (comprising **Sections 3 to 5**) contains an assessment of the main issues raised in submissions to the Plan Change and, where relevant, amplification of the evidence/statements presented at the hearing (in **Section 3**). We conclude with our decision (in **Section 5**), having had regard to the necessary statutory considerations that underpin our considerations (in **Section 4**). All these parts of the report are evaluative, and collectively record the substantive results of our deliberations.

² Section 32 of the RMA sets out the requirements for preparing and publishing reports that evaluate the appropriateness of a plan change.

Comments on the parties' assistance to us

- 1.10 In advance of setting out the Plan Change context, we would like to record our appreciation at the manner in which the hearing was conducted by all the parties taking part.
- 1.11 All those in attendance enabled a focused hearing process that greatly assisted us in assessing and determining the issues, and in delivering our decision.
- 1.12 With these initial thoughts recorded, we now set out the factual background to the Plan Change.

2. PLAN CHANGE CONTEXT

Site and local environment

- 2.1 The site subject to the Plan Change is shown in **Figure 1** on the following page, outlined in red. It covers approximately 454 hectares (ha) of land, located between the foothills of the Ruahine and Tararua Ranges and the south bank of the Manawatū awa. The Plan Change area is bounded by Turitea Valley to the west, Moonshine Valley to the east, and the existing built-up areas of Aokautere to the north. It is separated from the more established residential suburb of Aokautere by State Highway (SH) 57 / Aokautere Drive, which forms a key transport connection to the city centre. Measured as a straight line, the closest point of the Plan Change area is approximately 4.3 km from the city centre (The Square).
- 2.2 The Plan Change area is made up of eleven large, consolidated parcels or holdings referred to in **Table 1** on page 10 of this report. Roading access to the Plan Change area is obtained from SH57 / Aokautere Drive, via Pacific Drive, Johnstone Drive or Turitea Road. Key conditions within the Plan Change area have been summarised as follows:
- a. *The area has highly complex landforms and topography, which includes gullies and ravines, as well as flatter, elevated plateaus.*
 - b. *The landforms are highly dynamic and continue to change as a result of the interaction between overland flows and soft, highly erodible soils – the gullies and ravines have been formed by the passage of water, and there is still a high degree of interaction between landforms and streams, channelled stormwater and overland run-off.*
 - c. *There is a complex range of slopes, with some slopes up to 20-30 degrees, with the potential for land instability and associated geo-hazards.*
 - d. *The vegetated gullies have a range of biodiversity values and potential for restoration, especially those gullies where remnants of indigenous habitat remain. Some of these areas are compromised by illegal filling, fly tipping, pest plants and animals, and erosion from stormwater and overland flows.*
 - e. *The elevated nature of the area means there are strategic views into and out of the area, with boundary escarpments forming important landmark features.*
 - f. *The existing urban form within the plan change area is characterised by piecemeal development, with pockets of housing that are often poorly integrated and connected.*
 - g. *The existing roading hierarchy is limited to collector streets and cul-de-sacs, resulting in low connectivity.*
 - h. *The existing housing is predominantly suburban, with some rural residential properties on the fringes.*
 - i. *There is an absence of social facilities and other amenities within the plan change area. Existing residents rely on the Summerhill shopping centre to the north of SH57 for health and shopping facilities, other amenities, and primary schools³.*

³ As summarised in the Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, para 27



Figure 1: Plan Change area and surrounding locality. Not to scale.
(image source: Section 42A Report, Planning, 15 September 2023, page 6)

Operative District Plan

- 2.3 The land subject to the Plan Change is currently subject to a mix of Residential, Rural, Recreation, Conservation and Amenity Zones and a Rural-Residential Overlay in the District Plan. The current and proposed zoning and overlay pattern is described on a parcel-by-parcel basis in **Table 1** below.

Table 1: Operative and proposed zoning
(source: Section 32 Report, page 7)

Legal description	Operative zoning / overlay	Proposed Zoning
LOT 2 DP 484516 LOT 695 DP 509873 LOTS 1000 1001 DP 550078	Residential	Residential, Conservation & Amenity
LOT 98 DP 330144 LOT 1003 DP 490091	Residential	Residential, Conservation & Amenity
LOT 2 DP 484516 LOT 695 DP 509873 LOTS 1000 1001 DP 550078	Residential, Rural	Residential, Conservation & Amenity
LOT 2 DP 484516 LOT 695 DP 509873 LOTS 1000 1001 DP 550078	Residential	Residential, Conservation & Amenity
PT LOT 3 LOTS 6 7 DP 68798 LOT 44 45 DP 72136 -RECREATION RESERVE & WALKWAY	Residential, Recreation, Conservation & Amenity	Residential, Conservation & Amenity
LOT 98 DP 330144 LOT 1003 DP 490091	Residential, Rural	Residential, Local Business, Conservation & Amenity
LOT 224 DP 557630	Residential, Rural	Residential, Conservation & Amenity
SEC 2 SO 509209	Rural	Rural
LOT 1 DP 81706 LOT 1 DP 431826 SEC 3 SO 28303 SEC 1 SO 37253 SEC 1 SO 509209 PT SEC 292 293 TOWN OF FITZHERBERT	Rural, Rural-Residential Overlay	Rural, Conservation & Amenity, Rural-Residential Overlay
LOT 11 DP 560678 SEC 267 TWN OF FITZHERBERT	Rural, Rural-Residential Overlay	Residential, Rural, Conservation & Amenity, Rural-Residential Overlay
LOT 52 DP 553275	Residential, Rural	Residential

Purpose and objectives of the Plan Change

- 2.4 The purpose of the Plan Change is described in the Section 32 Report as follows:

Palmerston North is currently experiencing strong population growth. The City's population is projected to increase by an estimated 31,164 over the next 30 years, from 90,500 to 121,664.

PNCC is required to provide housing capacity to cater for the increasing population. The proposed plan change is part of the strategic planning response to assist in providing the necessary housing through land release and development of greenfield urban growth areas.

The purpose of Proposed PCG is to rezone land in the Aokautere area to enable additional housing capacity through residential development involving a range of density and housing types, supported by a local business zone ... This is

consistent with the identification of Aokautere as a growth location, with Council's stated projections ranging from 400 to 1200 additional dwellings within the greenfield growth area⁴.

- 2.5 The purpose of the Plan Change, with reference to intended outcomes beyond those solely relating to provision for housing and business, and to the components of the Plan Change, is further described in the key Section 42A Report prepared by Council officers, as follows:

The stated purpose of PCG is to provide for additional housing supply in the Aokautere area to help meet growth projections for Palmerston North over the medium to long term, and to ensure that this new housing is delivered in an environmentally sensitive, coordinated, and comprehensively planned manner.

The plan change seeks to manage additional growth and land use change in an area that, to date, has developed in an ad hoc and disconnected fashion. Along with housing, PCG seeks to deliver supporting facilities for the Aokautere community, including a new neighbourhood centre, roading and stormwater infrastructure; and an integrated open space network which utilises (and protects) the surrounding gully network and its habitats.

A Structure Plan has been produced to guide and direct development, with accompanying objectives, policies, methods and rules which seek to give effect to the Structure Plan. This approach seeks to:

- a) highlight the natural and landscape characteristics of the plan change area, and make them a feature of development;*
- b) protect and restore these natural areas and landscape features, in particular the gully areas;*
- c) support a range of housing densities and typologies, including medium density and multi-unit housing, with a high level of amenity and access to sunlight, open space, and connections to adjoining areas;*
- d) provide for a local business zone (neighbourhood centre) to ensure residents have access to local services and facilities, and to support opportunities for higher density living; and*
- e) deliver high quality transport, ecological, and water management outcomes⁵.*

- 2.6 We note that the notified version of the Plan Change proposes, in part, new objectives and amendments to existing objectives of the District Plan. For the purpose of determining whether the objective of the (Plan Change) proposal is the most appropriate way to meet the purpose of the Act we must, therefore, treat those new or amended District Plan objectives proposed by the Plan Change, as the relevant objective of the proposal⁶. We return to this matter in **Sections 3 and 4** of this report.

⁴ Palmerston North City District Plan – Section 32 – Plan Change G: Aokautere Growth Area, 2002, page 5, paras 5 – 7

⁵ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 12-13, paras 50 - 52

⁶ subsection (6) of s32, RMA

Components of the Plan Change

- 2.7 As notified, the Plan Change proposes to rezone the subject land to a mix of Residential, Local Business and Conservation and Amenity zones, as described on a parcel-by-parcel basis in **Table 1** on page 10 of this report and as illustrated in **Figure 2** on the following page. More specifically, the Plan Change involves amending the District Plan to:
- a. provide for both conventional and medium density housing, with the Plan Change expected to provide for 1,050 new dwellings of varying densities across rural residential, suburban low density, medium density, and apartment typologies⁷;
 - b. provide for the development of a comprehensively planned and well-connected neighbourhood centre alongside residential development, which supports retail/commercial and employment generating activities, and provides access to services and amenities;
 - c. provide for an optional development scenario within the growth area involving the development of a retirement village in association with the proposed neighbourhood centre, and representing a similar housing yield overall to that described in a. above;
 - d. rezone the gully network to a Conservation and Amenity Zone and provide for its vesting, protection, maintenance and enhancement;
 - e. retain a portion of land with a Rural-Residential zoning;
 - f. insert the Aokautere Structure Plan and related provisions to manage subdivision and development in accordance with the Structure Plan; and
 - g. make a number of consequential amendments⁸.

⁷ This is not meant to suggest that the development of the subject land in accordance with operative District Plan would not result in a contribution to the City's dwelling stock. This 'base' contribution was not quantified in the Council's Section 32 Report. However, the operative district plan yield was calculated and provided by the Council on the last day of the hearing - 8th December. It is labelled 'PCG area ownership and yield map: Operative District Plan'. The yield enabled by the operative plan within the residential zone would be an additional 377 lots. No calculation was provided for rural-residential land. It is clear given the nature of the operative zoning that the resulting yield would be lower than that represented by the notified Plan Change.

⁸ This description has been adapted from the Section 32 Report, pages 2-3, para 10

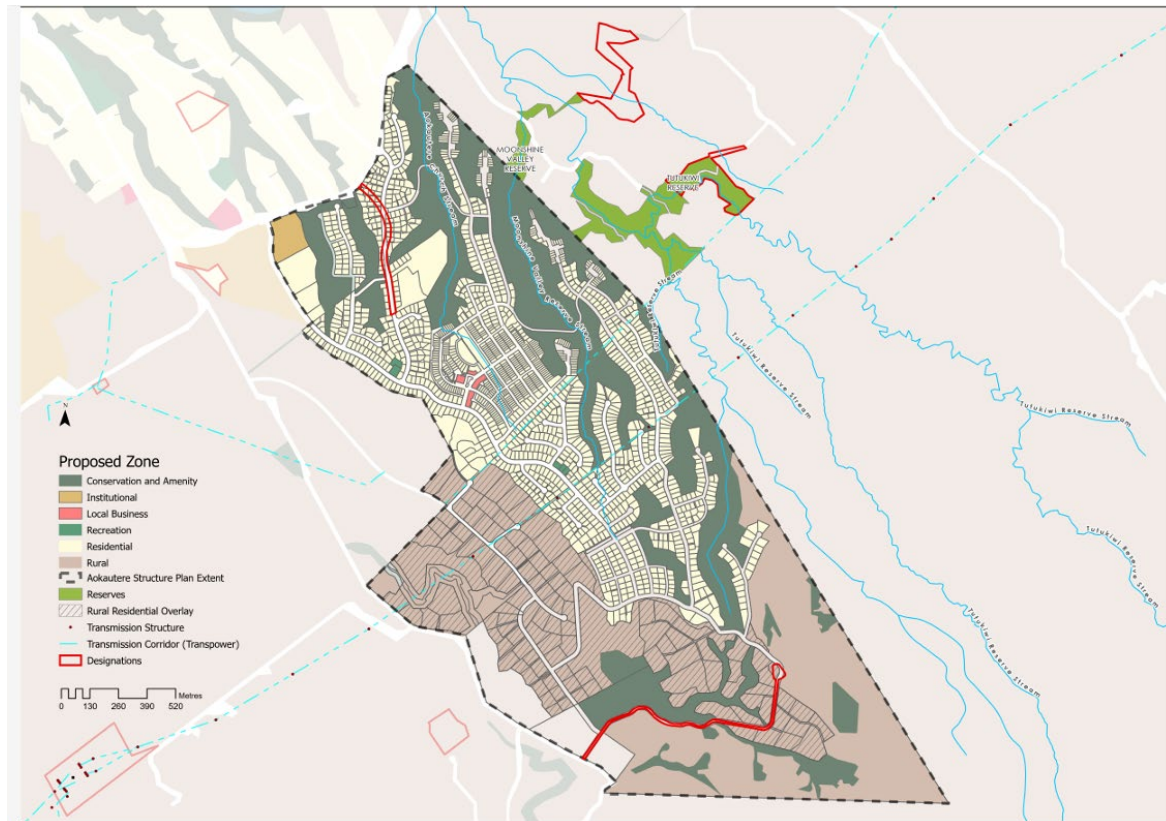


Figure 2: Proposed zoning. Not to scale.
(image source: Section 32 Report, Appendix 2, Zoning Maps)

- 2.8 Areas proposed to be rezoned or retained as Residential Zone are shown in **Figure 2**⁹ in cream, interspersed with 'long-fingered' areas proposed to be rezoned Conservation and Amenity Zone shown in army green.
- 2.9 Smaller areas to be rezoned Institutional, Local Business and Recreation Zone and located on the north-western corner, centre and two areas either side of that centre and are shown in mid brown, pink and chartreuse, respectively¹⁰.
- 2.10 The balance of the area retaining a Rural Zone to the south is shown in grey-brown, with a hatched Rural Residential Overlay applying over the majority of it.
- 2.11 Existing designations¹¹ are shown in red within the Plan Change area.
- 2.12 The area as proposed for rezoning corresponds with the design and layout of the area's proposed development as illustrated in the Proposed Structure Plan which accompanies the Plan Change, and which is reproduced as **Figure 3** on the following page¹².

⁹ The map shows some areas which are already built out and therefore are retaining their operative zoning. This applies particularly in the northern area of the plan change, which has operative residential zoning. Other zoned areas are also not changing, in particular the area zoned institutional (international school) and the Pacific Drive Reserve (zoned Recreation)..

¹⁰ The area shown as Institutional Zone is operative zoning and is not proposed to be rezoned. Likewise, the Pacific Drive Reserve on corner of Pacific Drive and Johnstone Drive is an existing reserve, zoned Recreation, and this zoning is not changing..

¹¹ These designations are all operative. No new designations are proposed as part of the plan change.

¹² As noted earlier, a derivation of the proposed structure plan accommodating the Adderstone Reserve Option is also featured in the Section 32 Report but is not reproduced here for reasons of brevity.

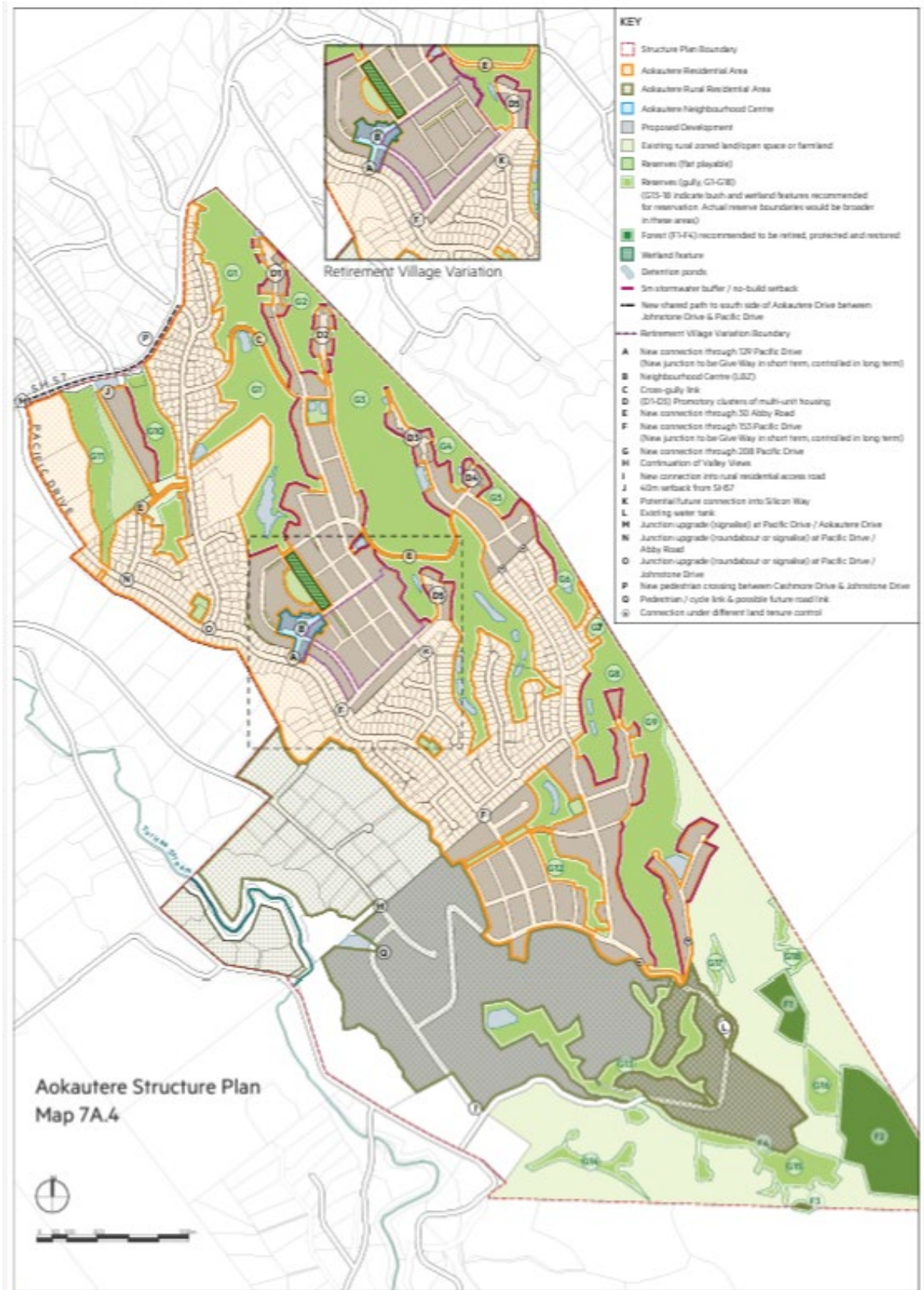


Figure 3 Aokautere Structure Plan. Not to scale.
(image source: Section 32 Report, Appendix 3, Aokautere Structure Plans)

Development of the Plan Change

- 2.13 A useful overview of the development of the Plan Change is set out in the key Section 42A Report prepared by Council officers¹³. What follows is a brief summary adopted from that overview:
- a. Early 2018: Initiation of a multi-disciplinary masterplanning process by the Council with the intent of developing an overarching plan to address ad-hoc development at Aokautere.
 - b. Course of 2018: Informal engagement with Rangitāne o Manawatū as iwi partners and key stakeholders including the owners of the subject land, the local community, Ministry of Education, Waka Kotahi and Horizons Regional Council.
 - c. August - September 2019: Publication of early draft of the Aokautere Structure Plan for wider community feedback, inclusive of a public drop-in session.
 - d. Remainder 2019 and early 2020: Refinement of Structure Plan following feedback, development of draft Plan Change and commissioning of technical reports.
 - e. Remainder 2020: Engagement with iwi and hapū on the draft provisions. Commissioning and receipt of Cultural Impact Assessment (CIA) from Rangitāne o Manawatū.
 - f. 2021 and early 2022: Refinement of draft provisions and technical reports following feedback. Preparation of section 32 evaluation report.
 - g. April / May 2022: Finalising of draft provisions and technical reports.
 - h. June 2022: Council officer recommendation to Council for notification of Plan Change.
 - i. 5 August 2022: Direct notification of parties specified in clause 5A, Schedule 1, RMA.
 - j. 8 August 2022: Public notification of Plan Change.
 - k. 5 September 2022: Closing date for submissions on Plan Change.
 - l. 19 November 2022: Public notification of Summary of Decisions Requested.
 - m. 2 December 2022: Closing date for further submissions.
 - n. Late 2022 to mid-2023: Informal meetings between Council officers and submitters for the purposes of better understanding matters raised in submissions and to provide advice on the Plan Change process.
 - o. Week of 25 September 2023: Pre-hearing meetings on a number of key topics emerging from submissions and further submissions, attended by Council officers and submitters.
 - p. Week of 4 December 2023: Hearing on the Plan Change.
- 2.14 The Section 32 Report contains a detailed summary of the feedback received from iwi and hapū, landowners, the community and other stakeholders on the draft Structure Plan and Plan Change provisions during the phases described in b. to e. above and how this

¹³ Section 42A Report of Anita Renie Coppleson on Behalf of Palmerston North City Council, Planning, 15 September 2023, Section 2.6

feedback was reflected in the provisions as they came to be finalised for the purposes of public notification¹⁴.

- 2.15 Following an evaluation of alternatives and the preferred option¹⁵, an assessment of the appropriateness of the Plan Change objectives, and an assessment of proposed policies and rules, the Section 32 Report concludes that the preferred option (in comparison with the alternatives considered) is the most appropriate way to achieve the purpose of the Act as it:
- a. will assist the Council in providing housing capacity that represents a mix of housing density, typology and affordability features;
 - b. aligns with the City's housing strategies that identify Aokautere as a growth area;
 - c. gives effect to the National Policy Statement on Urban Development (NPS-UD);
 - d. provides the greatest level of direction of design and amenity outcomes for the Aokautere Residential Area;
 - e. will assist in ensuring the delivery of an attractive, high amenity, pedestrian focused neighbourhood centre; and
 - f. will assist in delivering environmental, social and cultural benefits arising from the management of the gully network¹⁶.
- 2.16 In reaching this conclusion, the Section 32 Report includes a discussion on the risk of acting or not acting, in accordance with the requirements of s32(2)(c) of the RMA. In this respect, the report considers that there is sufficient information and certainty about the subject matter of the proposed provisions that likely outweigh the risks of acting. Conversely, the Section 32 Report considers that there are significant risks around not acting, as follows:
- a. the inability to meet projected housing demand and provide a range of housing choice;
 - b. the likely exacerbation of housing affordability issues;
 - c. flow on effects on economic and social potential;
 - d. on-going ad hoc, uncoordinated development on the City's urban margins;
 - e. the potential for development to occur in advance of the provision of necessary infrastructure;
 - f. the absence of measures to protect, restore and enhance the gully network; and
 - g. a failure to give effect to higher order documents, particularly the NPS-UD¹⁷.
- 2.17 The notified Plan Change provisions, inclusive of the changes proposed to the District Plan, zoning maps and structure plans are attached to the Section 32 Report, as Appendices 1, 2 and 3, respectively. The Plan Change documentation bundle also comprises a number of technical reports and assessments, as follows:

¹⁴ Palmerston North City District Plan – Section 32 – Plan Change G: Aokautere Growth Area, 2002, Section 4

¹⁵ The preferred option is the Plan Change provisions as subsequently notified and as summarised in paras 2.7 to 2.12 of this report.

¹⁶ Palmerston North City District Plan – Section 32 – Plan Change G: Aokautere Growth Area, 2002, Section 9

¹⁷ Palmerston North City District Plan – Section 32 – Plan Change G: Aokautere Growth Area, 2002, Section 8.2

- a. Appendix 4: The *Palmerston North Aokautere Masterplan*, prepared for the Council by a multi-disciplinary consultancy team led by McIndoe Urban, dated 30 May 2022, and in turn comprising three parts (Introduction, Existing Conditions and Masterplan);
- b. Appendix 5: A *Transportation Assessment*, prepared by Harriet Fraser Traffic Engineering & Transportation Planning, dated 28 July 2022;
- c. Appendix 6: A *Cultural Impact Assessment*, prepared by Te Ao Turoa Environmental Centre, part of Bestcare (Whakapai Hauora) Charitable Trust on behalf of Rangitāne o Manawatū, dated 2020;
- d. Appendix 7: An ecological constraints assessment, titled *Aokautere Structure Plan – Ecological Features, Constraints and Restoration*, prepared by Forbes Ecology, dated July 2021;
- e. Appendix 8: An acoustic assessment, titled *Rifle Rod and Gun Club – Reserve Sensitivity Noise Assessment*, prepared by Acousafe Consulting and Engineering, dated 17 January 2020;
- f. Appendix 9: A geotechnical assessment, titled *Aokautere slope stability: considerations for consenting*, prepared by Tonkin + Taylor, dated 12 May 2022;
- g. Appendix 10: A landscape character assessment, titled *Palmerston North City Council – Aokautere Structure Plan*, prepared by Hudson Associates Landscape Architects, dated 27 July 2022;
- h. Appendix 11: A *Stormwater Management Strategy*, prepared by GHD, dated 23 May 2022;
- i. Appendix 12: A retail report, titled *North Village – Review of Development Framework & Potential for a Village Centre*, prepared by Urbacity, dated May 2022;
- j. Appendix 13: A servicing assessment, titled *Aokautere Residential Plan Change – Parks + Services Servicing Assessment [sic] 2021*, prepared by the Council's Parks and Reserves Department, dated 13 December 2021; and
- k. Appendix 14: An urban design statement, titled *Aokautere Structure Plan – Urban Design Statement for Planning Controls*, prepared by McIndoe Urban, dated 28 July 2022.

- 2.18 The Plan Change bundle also includes a summary of the findings of the assessments referred to in b. to j. above, as Appendix 15. Where relevant, we refer to these findings, and to evidence presented or tabled at the hearing by their respective authors, at appropriate points under the relevant issue in **Section 3** of our report.
- 2.19 We note here that further amendments to the Plan Change as notified were proposed during the course of the hearing. A s32AA evaluation is required when changes have been made to a proposed Plan Change since the original evaluation report was completed, and where required, must be undertaken in accordance with s32(1) to (4) of the RMA. We refer to the subsequent s32AA evaluations undertaken by Council officers or on behalf of submitters at appropriate points under the relevant issue in **Section 3** of our report.

Notification process and submissions received

- 2.20 The Plan Change was publicly notified on 8 August 2022. The closing date for submissions was 5 September 2022.
- 2.21 A total of 103 submissions were lodged with the Council by the closing date, with a further four late submissions subsequently received (107 in total).
- 2.22 The Summary of Decisions Requested (by submissions) was publicly notified on 19 November 2022 and drew five further submissions, including one late further submission. We provide a full summary of the submissions received in **Appendix 1**, including our decisions on the relief sought by each submitter.
- 2.23 Without taking away from the finer detail provided in the submissions, the matters raised in those submissions and further submissions fall into one or more of the following topics:
- a. preliminary matters;
 - b. urban development and intensification;
 - c. climate change and emissions reduction;
 - d. stormwater, flooding and erosion;
 - e. geotechnical constraints and hazards;
 - f. transport;
 - g. addressing housing needs;
 - h. the Local Business Zone – Aokautere Neighbourhood Centre;
 - i. the Conservation and Amenity Zone and matters relating to indigenous biodiversity;
 - j. cultural values;
 - k. visual amenity and landscape effects, including on the adjacent Moonshine Valley;
 - l. noise;
 - m. parks and open space;
 - n. community facilities (other than recreation, parks and open space);
 - o. wellbeing and safety;
 - p. infrastructure and services;
 - q. zoning matters; and
 - r. general matters and submissions relating to the Plan Change as a whole.
- 2.24 Underpinning many of the above issues was a concern by some submitters that the Plan Change as notified was too prescriptive in terms of the methods, rules, standards, activity status and structure plan, to effectively and efficiently enable the outcome of an integrated greenfield development. This matter is one of those that remained contested at the hearing and that in our view constitutes one of the key issues before us. We identify all key issues at the start of our issue evaluation in **Section 3** of this report, noting that all the matters raised in submissions and summarised in a. to r. above are addressed and

discussed within one or more of the issue topics covered in **Section 3 - Pre-hearing directions and procedures.**

- 2.25 Prior to the commencement of the hearing, we issued five minutes to the parties to address various administrative and substantive matters. These minutes, and the others we issued through the course of the hearing and deliberations processes are available on Council file.
- 2.26 In summary, the Panel's pre-hearing minutes addressed the following:
- a. **Minute 1** (2 June 2023) – this confirmed the likely date of the hearing (week of 4 December 2023), provided encouragement with respect to pre-hearing discussions and meetings and expert conferencing between the parties, set out dates for the circulation of evidence before the hearing, and provided a brief summary of the hearing process and the Panel's approach to site visits.
 - b. **Minute 2** (8 August 2023) – this confirmed the composition of the Panel, provided an update on arrangements for the pre-circulation of evidence, the timetabling of pre-hearing meetings (during the week of 25 September 2023) and further guidance regarding hearing processes, presentations and site visits.
 - c. **Minute 3** (7 November 2023) – this provided an update on the Panel's direction with respect to expert conferencing on transport (safety), stormwater and planning topics, and related hearing administration matters.
 - d. **Minute 4** (24 November 2023) – this provided an update on progress with respect to directed expert conferencing and the consequential preparation of joint witness statements (JWS) on the relevant topics, together with progress in finalising a hearing schedule.
 - e. **Minute 5** (30 November 2023) – this provided an update on administrative matters prior to the hearing commencing the following week.
- 2.27 We undertook an initial site visit on 4 December 2023 (prior to commencing the hearing) to familiarise ourselves with the Plan Change area and the surrounding land. We undertook further site visits on the morning of 7 December 2023, including of some specific areas requested by submitters. We thank the Council officers and submitters who assisted us in this regard.
- 2.28 In the lead up to the hearing, the following reports and evidence were received and made available to all parties in accordance with the proposed timetable:
- a. A summary of matters discussed at the series of pre-hearing meetings held during the week of 25 September 2023, prepared by the chairpersons concerned.
 - b. A series of Section 42A Reports prepared by Council officers, all dated 15 September 2023, as follows:
 - i. on planning matters relating to the Plan Change, by consulting senior planner Ms Anita Coplestone, to which is attached a copy of the Plan Change provisions, inclusive of amendments she recommended in response to submissions, and her recommendations as to whether submissions should be accepted, or not;
 - ii. on strategic planning matters, by Council's chief planning officer Mr David Murphy;

- iii. on urban design matters, by consulting urban designer Mr Andrew Burns;
 - iv. on stormwater matters, by consulting senior water engineer Ms Allison Baugham and consulting civil engineer Mr Tony Miller;
 - v. on geotechnical matters, by consulting engineering geologist Mr Eric Bird;
 - vi. on transportation matters, by consulting traffic engineer and transportation planner Ms Harriet Fraser;
 - vii. on matters relating to urban economics, by consulting urban planner and economist Mr Michael Cullen;
 - viii. in relation to feasibility assessments, by principal property advisor Ms Ruth Allen and senior property consultant Mr Gareth Nicholl;
 - ix. on ecological matters, by consulting principal ecologist Dr Adam Forbes;
 - x. on landscape matters, by consulting landscape architect Mr John Hudson;
 - xi. on matters relating to acoustics, by consulting acoustic engineer Mr Nigel Lloyd; and
 - xii. on matters relating to parks and reserves, by Council's activity manager for parks, Mr Aaron Phillips.
- c. Statements of expert evidence on behalf of submitters, as follows:
- i. Planning evidence from planner Ms Christle Pilkington on behalf of Palmerston North Industrial and Residential Developments Ltd (PNIRD)¹⁸, dated 27 October 2023;
 - ii. Stormwater evidence from civil engineer Mr Jack Out on behalf of Heritage Estates (2000) Ltd¹⁹, undated;
 - iii. Planning, masterplanning, architectural and project management evidence from architect Ms Amanda Coats on behalf of Heritage Estates (2000) Ltd, undated;
 - iv. Planning evidence from planner Mr Paul Thomas on behalf of Woodgate Ltd *et al.*²⁰, dated 27 October 2023;
 - v. Planning evidence from senior planner Mr Pepa Moefili on behalf of Ngawai Farms Ltd (Stu Waters)²¹, dated 27 October 2023;
 - vi. Corporate evidence from regional manager Ms Sarah Downs on behalf of Waka Kotahi New Zealand Transport Agency²², dated 27 October 2023;
 - vii. Planning evidence from planner Ms Sarah Jenkin on behalf of Waka Kotahi New Zealand Transport Agency, dated 27 October 2023; and
 - viii. Transport evidence from senior safety engineer Mr Glenn Connelly on behalf of Waka Kotahi New Zealand Transport Agency, dated 27 October 2023.

¹⁸ Submission S045

¹⁹ Submission S051

²⁰ Submission S058

²¹ Submission S061

²² Submission S063

- 2.29 As noted above, Ms Copplestone recommended a series of changes to the Plan Change as notified in response to submissions within the context of her section 42A Report. As summarised by the counsel for PNCC²³, these amendments were to:
- a. policies in Sections 7A and 10 to reflect the desired design and development outcomes in the Structure Plan, rather than directing the methods to achieve these;
 - b. performance standards within the local centre to provide for greater flexibility;
 - c. performance standards to better reflect stormwater and geotechnical constraints;
 - d. provide greater flexibility as to development density on the promontories;
 - e. impose a building setback and reduced building heights along the common boundary with Moonshine Valley properties to address potential adverse effects on amenity and privacy;
 - f. zone boundaries relating to the Local Business Zone and indigenous forest remnants;
 - g. Map 10.1A showing 'developable' and 'limited developable' land to reflect updated modelling information on stream downcutting; and
 - h. performance standards and matters of discretion to ensure that they only apply to the Structure Plan area.
- 2.30 As a result of directed expert conferencing, we received and made available to all parties two JWS, as follows:
- a. In relation to planning matters, with the participation of Ms Copplestone, Ms Pilkington, Ms Coats, Ms Jenkin, Mr Thomas and Mr Moefili, dated 15 and 16 November 2023.
 - b. In relation to transportation matters, with the participation of Ms Fraser and Mr Connelly, dated 14 November 2023.
- 2.31 Collectively, these JWS resulted in some joint recommendations to further amend the Plan Change provisions.
- 2.32 Finally, in the lead up to or at the hearing we also received and made available written statements of evidence by or on behalf of submitters, as follows:
- a. Dr Rosemary Gear from Moonshine Valley²⁴, dated 24 October 2023;
 - b. Mr Brett Guthrie from Moonshine Valley²⁵, undated;
 - c. Dr Chris Teo-Sherrell²⁶, undated;
 - d. Mr John Farquhar on behalf of Heritage Estates (2000) Ltd²⁷, undated; and
 - e. Mr Les Fugle on behalf of Woodgate Ltd *et al.*²⁸, dated 4 November 2023.

²³ *Opening Submissions on behalf of Palmerston North City Council*, 4 December 2023, para 29

²⁴ Submission S039

²⁵ Submission S041

²⁶ Submission S043

²⁷ Submission S051

²⁸ Submission S058

- 2.33 Having considered the evidence provided by or on behalf of submitters, Council officers provided us with statements of reply evidence (all dated 28 November 2023). Ms Copplestone's reply statement contained a series of annexures setting out recommended amendments to the Plan Change's transport and stormwater provisions, and zoning maps, reflecting both the outcomes of the JWS and her own further consideration of evidence.

The hearing

- 2.34 The hearing commenced at 1:00pm on Monday, 4 December 2023 in the Council Chambers. It was held at the same venue on the Tuesday, Thursday and Friday following (5, 7 and 8 December 2023), with a temporary shift in location to the Conference and Function Centre on Main Street, Palmerston North on the Wednesday (6 December 2023).
- 2.35 The entire hearing was recorded and links to the videos for each day can be found [here](#). All the documents referred to in this section are available on the council file and [Plan Change](#) and [hearing](#) web pages.
- 2.36 Councillor Johnson provided opening and closing karakia.
- 2.37 At the outset of proceedings, we outlined the manner in which we expected the hearing to be conducted and called for appearances and introductions from the attendees. We also set out a range of procedural matters and outlined our role and the relevant statutory matters framing our consideration of the proposal.
- 2.38 Over the course of the hearing, we heard from the following people:

Council

- Ms Shannon Johnston, legal counsel
- Mr David Murphy, Council's chief planning officer
- Mr Andrew Burns, consulting urban designer
- Ms Anita Copplestone, consulting senior planner
- Mr John Hudson, consulting landscape architect
- Mr Eric Bird, consulting engineering geologist
- Ms Harriet Fraser, consulting traffic engineer and transportation planner
- Ms Allison Baugham, consulting senior water engineer and Mr Tony Millar, consulting civil engineer
- Dr Adam Forbes, consulting principal ecologist
- Mr Michael Cullen, consulting urban planner and economist
- Ms Ruth Allen, consulting principal property advisor
- Mr Nigel Lloyd, consulting acoustic engineer
- Mr Aaron Phillips, Council's activity manager for parks

As or on behalf of submitters

- Ms Tabitha Prisk for herself²⁹
- Mr Sarah Downs (corporate), Mr Glenn Connelly (transport) and Ms Sarah Jenkin (planning) for Waka Kotahi New Zealand Transport Agency³⁰
- Mr John Farquhar (director), Mr Jack Out (stormwater), Ms Amanda Coats (planning) and Mr John Maassen (legal counsel)³¹ for Heritage Estates (2000) Ltd³²
- Ms Gill Welch for herself and her husband Mr Steve Welsh³³
- Mr Martin Hunt, vice-president of the Rifle Rod and Gun Club Manawatū³⁴
- Mr Paul Thomas (planning) and Mr Les Fugle (director) for Woodgate Ltd *et al.*³⁵
- Mr Stu Waters (director) for Ngawai Farms Ltd³⁶
- Ms Christle Pilkinton (planning) for PNIRD³⁷
- Mr Anthony Gear and Dr Rosemary Gear for themselves³⁸
- Mr Brett Guthrie for himself³⁹
- Mr Robert McLachlan for himself⁴⁰
- Mr Bruce Wilson for himself⁴¹
- Mr Rob Campbell for himself⁴²
- Mr Paul Dixon and Ms Jan Dixon for themselves⁴³
- Mr Robert Gardner for himself⁴⁴
- Dr Chris Teo-Sherrell for himself⁴⁵

2.39 During the course of the hearing, the following evidence was tabled:

- Opening legal submissions from Ms Johnston on behalf of the Council
- Summaries of evidence on behalf of the Council from Ms Copplestone, Mr Burns, Mr Hudson, Mr Bird, Ms Fraser, Ms Baugham, Dr Forbes, Mr Cullen, Mr Lloyd and Mr Phillips
- Various explanatory materials relating to the Plan Change supplied by Council
- Hearing statements from Mr Farquhar and Ms Coats on behalf of Heritage Estates (2000) Ltd

²⁹ Submission S084

³⁰ Submission S063, FS2

³¹ Tabled legal submissions read at the hearing by Mr Dobson

³² Submissions S051, FS5

³³ Submissions S049 and S065, respectively

³⁴ Submission S076

³⁵ Submission S058

³⁶ Submission S061

³⁷ Submission S045

³⁸ Submissions S039, FS3

³⁹ Submissions S041, FS4

⁴⁰ Submission S018

⁴¹ Submission S0105

⁴² Submission S079

⁴³ Submission S056

⁴⁴ Submission S0102

⁴⁵ Submission S043

- Hearing statements from Ms Jenkin, Mr Connelly and Ms Downs on behalf of Waka Kotahi New Zealand Transport Agency
 - A hearing statement from Ms Prisk
 - Hearing statements from Ms Pilkington on behalf of PNIRD
 - Hearing statements from Mr Fugle and Mr Thomas on behalf of Woodgate Ltd *et al.*
 - A hearing statement from Mr Waters on behalf of Ngawai Farms Ltd
 - A hearing statement from Mr Hunt on behalf of the Rifle Rod and Gun Club Manawatū
 - Hearing statements from Dr Gear, Mr Guthrie, Dr Teo-Sherrell, Mr Gardner and Mr Wilson
 - Hearing statements from Mr Scott and Professor Sims⁴⁶, neither of whom could attend the hearing
 - Additional hearing statements and addendums to evidence from Ms Prisk, Ms Coats, and Mr Hunt
- 2.40 All other submitters chose not to present at the hearing. However, the issues raised in those submissions remain 'live' for our consideration and we have done so, as we are required to do.
- 2.41 A number of observers and interested parties were also present at the hearing.
- 2.42 During the course of the hearing, we verbally asked Council officers to respond to a number of queries and points for clarification, that can summarised as follows:
- a. in relation to the Structure Plan, confirm the level of prescriptiveness placed on individual elements in terms of the locations shown;
 - b. identify an appropriate level of 'directiveness' for these elements (i.e., whether they should be categorised as 'fixed', 'flexible' or 'indicative');
 - c. consider various consenting scenarios and how they would be assessed in demonstrating 'general accordance' with the Structure Plan;
 - d. consider the most efficient and effective means of achieving the objectives of the Plan Change with reference to performance standards and resulting activity status where that 'general accordance' is not achieved;
 - e. a review of the efficiency and effectiveness of the proposed provisions in achieving a directive approach to development;
 - f. whether a standalone chapter had been considered for the Plan Change;
 - g. the role of the Conservation and Amenity Zone and how it gives effect to the high order statutory framework;
 - h. how geotechnical, landscape and natural environment values within gullies are accounted for and addressed when assessing works proposed in these locations;
 - i. the potential need for directive objectives and policies relating to stormwater and managing stormwater effects in sensitive gully environments;

⁴⁶ Submissions S054 and S031, respectively

- j. evidence presented by PNIRD to support the proposed alternative 'Terrace Link' and 'Gully 9' connections and the request to apply a Rural-Residential Overlay over portions of land within the Green Block labelled 'Area A' and 'Area B';
- k. whether the approach taken to medium density housing was mandatory or directive;
- l. what framework was in place to manage the quality of medium density housing;
- m. what an appropriate activity status would be for any proposed retirement village in the Plan Change area;
- n. whether there should be a land use rule to prevent the development of dwellings as a means to manage reverse sensitive effects in relation to the operation of the Rifle Rod and Gun Club; and
- o. what noise monitoring and modelling methodology had been employed with respect to the Gun Club⁴⁷.

2.43 These queries and points for clarification all go to our identification and consideration of key issues in **Section 3** of our report. At the end of the hearing, PNCC's counsel indicated that these matters would be addressed in the Council's closing submissions and reply statements.

2.44 We adjourned the hearing at 2:15pm on Friday, 8 December 2023, noting verbally at the time that we would be advising the parties subsequently of a date for formally closing the hearing.

Post hearing and hearing closure

2.45 Following our adjournment of the hearing, we issued **Minute 6** on 15 December 2023. The purpose of this minute was to record some updated directions from the Panel. The minute:

- a. noted that Ms Johnston, for the Council, had advised during her verbal right of reply the substantive topics arising from the hearing that remained to be addressed;
- b. a further three supplementary statements were required from Mr Murphy, Mr Phillips and Ms Copplestone; and
- c. acknowledged the additional statements received after the hearing from Mr Thomas on behalf of Woodgate Ltd *et al.* and Dr Gear.

2.46 The minute advised that, given the quantum of work involved, particularly with respect to matter a. above, that the due date for Council's written reply would be extended to 2 February 2024.

2.47 We subsequently received a memorandum of counsel for the Council⁴⁸ seeking further direction on the form of the requested response in relation to one of the substantive matters raised; that relating to the roading connections referred to as the 'Terrace Link' proposed by PNIRD⁴⁹. Ms Johnston indicated that Council officers retained an open mind regarding the proposal but that, in order to be in a position to make definite

⁴⁷ As referred to at various points in Ms Copplestone's *Supplementary Statement* dated 11 March 2024

⁴⁸ *Memorandum of Counsel for Palmerston North City Council* dated 15 December 2023)

⁴⁹ Submission S045

recommendations on the matter, additional information was sought from the submitter, including detailed drawings of preferred roading alignments.

- 2.48 This led us to issue **Minute 7** on 18 December 2023, wherein we invited the submitter and the Council to file additional evidence on the matters summarised in paragraph 2.42 above, and respond to that evidence, respectively. We requested that by 22 December 2023 the submitter advise their willingness and ability to supply the information requested by 24 January 2024, to enable us to then set a date for the Council's response, all within the previously advised date for Council's right of reply (2 February 2024) set out in **Minute 6**.
- 2.49 We received the information from PNIRD by the date requested. Through its counsel, PNCC then made a series of requests for additional time for the supply of the Council's response, partly prompted by an accident befalling one of its witnesses. We granted these requests within the context of **Minutes 8, 9 and 10**⁵⁰. This brought the delivery date for the Council's response to 11 March 2024.
- 2.50 We received the Council's response, inclusive of counsel's closing submissions and supplementary statements from Ms Coplestone, Mr Murphy, Mr Burns, Ms Fraser, Ms Baugham, Dr Forbes, Mr Hudson, Ms Allen, Mr Bird and Mr Phillips on that date. Collectively, in our review, the reply statements provide a comprehensive response to the queries and points for clarification set out in paragraph 2.42 above.
- 2.51 In her reply statement, Ms Coplestone provides a s32AA evaluation of the amended Plan Change she latterly recommends⁵¹. These recommendations can be summarised as follows:
- a. amending the Precinct Plan Map and neighbourhood centre local business provisions to reduce the level of prescription and required detail to provide more flexibility to developers of the centre;
 - b. amending the transport provisions to improve the level of precision and certainty, and encourage necessary intersection upgrades to be undertaken prior to land use development;
 - c. amending the provisions relating to stormwater management to make them more directive and require that primary stormwater elements are installed and operational prior to land use development;
 - d. amending provisions relating to housing density to make them more directive;
 - e. rezoning the developable area of land within 'Area A' on the western boundary of the Structure Plan from Rural to Rural-Residential Overlay, and the wetland area as Conservation and Amenity Zone, while retaining a Rural zoning over the remaining area of land;
 - f. rezoning the area of land identified as 'Area B' on the eastern boundary of the Structure Plan from Rural to Rural-Residential Overlay, and 'Gully 19' as Conservation and Amenity Zone;
 - g. amending the Structure Plan and related provisions to clarify the 'fixed' or 'flexible' status of certain features and provide direction on assessing whether 'general accordant' has been achieved; and

⁵⁰ Dated 31 January, 14 February and 26 February 2024, respectively.

⁵¹ At Annexure 3

- h. amending the Structure Plan and related provisions to provide for the ‘subdividing off’ of gully areas for conservation purposes.
- 2.52 We note for completeness that we had also received some further materials from Ms Welch, Dr Gear and on behalf of Woodgate Ltd *et al.* following the hearing.
- 2.53 Having that final information to hand, we were in a position to resume our deliberations, which we undertook between 18 March and 15 April 2024.
- 2.54 As a final formality, we then issued **Minute 11** on 16 April 2024, confirming that having reviewed all the information provided by the submitters and the Council, we were satisfied that there was no further information required to deliver our decision on the proposed Plan Change.
- 2.55 On that basis, we thanked all parties and advised that as we had completed our deliberations that the hearing was now closed. Our closing minute is available on Council file.

Directions with respect to procedural matters

- 2.56 Ms Copplestone’s Section 42A Report⁵² addressed two procedural matters arising prior to the hearing, as follows:
- a. a recommendation to accept four late submissions and one later further submission; and
 - b. advising that the Environment Court had issued a decision on 25 October 2022 granting the Council’s application that certain Plan Change provisions relating to subdivision, greenfield residential areas, and the Residential, Business and Recreation Zones have immediate legal effect from that same day⁵³.
- 2.57 We accept Ms Copplestone’s recommendation and note her advice in these respects. We note that the purpose of the provisions concerned assuming immediate legal effect is to prevent a ‘goldrush’ of subdivision and development applications in the period before a decision on the overall Plan Change is made.
- 2.58 No procedural matters of note were raised during the course of the hearing that we were obliged to make a finding on.

⁵² Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, Section 2.7

⁵³ Pursuant to s86D of the RMA

3. EVALUATION OF ISSUES

Overview of our approach and structure of this section

- 3.1 For the purposes of this evaluation, we have grouped our discussion of the submissions and the reasons for accepting, rejecting, or accepting them in part by the specific *matters*⁵⁴ to which they relate – rather than assessing each issue on a submitter-by-submitter basis. This we do under the heading **Specific matters requiring our evaluation**.
- 3.2 This approach is not to downplay the importance of the input from submitters; to the contrary, their input has been invaluable in shaping the grouping of issues and for our consideration of those matters. However, we note that there was some commonality among the submissions on key issues and we consider it will be to everyone’s benefit for our decision to be as tightly focused on the key issues as possible.
- 3.3 For those parties who are only interested in a particular matter as it pertains to their submission(s), reference can be made to the submitter-by-submitter summary of decisions requested in **Appendix 1**, which includes decisions on each relief point sought. Those specific decisions have been derived from our issues assessment below.
- 3.4 As a starting point for evaluating the issues before us, if any contested matter in hand was resolved by the relevant technical experts via JWS or other means, then we have not attempted to revisit or relitigate it. Only where a matter remains contested and/or unresolved, do we make a finding. On that score, we would observe that, except for one or two exceptions, very little expert evidence was fielded beyond that presented on behalf of PNCC; naturally this further narrows our frame of reference.
- 3.5 Also guiding our evaluations is our awareness that in mid-March 2024 the Council presented us with marked up amended provisions, updated structure plans, modified zoning maps and other material relating to PCG under the cover of its supplementary statements. Collectively, this represents a considerable amount of work to amend PCG in response to submissions, and informed by expert assessment and advice. We appreciate the efforts of Council officers/representatives in this respect.
- 3.6 This leads us to a stepwise approach, wherein we:
- a. first test whether the rationale for PCG as now proposed is sound; and
 - b. secondly, (and assuming that we are able to conclude that it is), we then determine whether the proposed zoning pattern is appropriate; and
 - c. thirdly, consider whether the planning framework or specific PCG provisions are appropriate.
- 3.7 These three steps are the matters we turn our minds to under the broad heading **Overall evaluation** and the sub-headings **Rationale for rezoning**, **Appropriateness of rezoning** and **Most appropriate Plan Change provisions framework** towards the end of this section. In doing so we draw on the findings we have first reached in relation to specific topics or issues under the heading **Specific matters requiring our evaluation**.
- 3.8 Further, we note that PCG is a complex plan change, in part because it involves amendments to a complex operative District Plan. The provisions of PCG have evolved

⁵⁴ Clause 10(2)(a) of Schedule 1, RMA sets out that a plan change decision may address submissions by grouping them according to either the provisions of the plan change to which they relate, or to the matters to which they relate.

over the course of the hearing, as is to be expected. What we have not done is undertake a forensic analysis or review of the PCG provisions as they now stand; rather, we rely on Council reporting officers familiarity with the District Plan architecture, inter-relationships and drafting protocols to have got it right. As noted above, we have focused at a broader level on whether the overall approach is justified and appropriate.

- 3.9 Before formally recording our evaluation of the above topics or issues, we summarise here the relevant statutory matters that frame our evaluation. They have been derived from the Environment Court's *Colonial Vineyards* decision⁵⁵, and include the following considerations:

General Requirements

- a. the District Plan should be designed in accordance with⁵⁶, and assist the Council to carry out, its functions⁵⁷ so as to achieve the purpose of the Act⁵⁸;
- b. when changing the District Plan, the Council must:
 - i. give effect to any National Policy Statement (NPS)⁵⁹, the New Zealand Coastal Policy Statement (NZCPS)⁶⁰ or any Regional Policy Statement (RPS)^{61 62};
 - ii. have regard to any *proposed* RPS⁶³;
 - iii. have regard to any management plans and strategies under any other Acts and to any relevant entry on the NZ Heritage List and to various fisheries regulations (to the extent relevant), and to consistency with plans and proposed plans of adjacent authorities⁶⁴;
 - iv. take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority⁶⁵;
 - v. not have regard to trade competition⁶⁶; and
 - vi. be in accordance with any regulation⁶⁷;
- c. in relation to regional plans:
 - i. the District Plan must not be inconsistent with an operative regional plan for any matter specified in s30(1) or any water conservation order⁶⁸; and
 - ii. shall have regard to any proposed regional plan on any matter of regional significance or for which the regional council has primary responsibility⁶⁹;
- d. the District Plan must also state its objectives, policies and the rules (if any) and may state other matters⁷⁰;

⁵⁵ ENV-2012-CHC-108, [2014] NZEnvC 55 (updated to reflect amendments to the RMA in 2013, 2017 and 2021)

⁵⁶ s74(1), RMA

⁵⁷ s31, RMA.

⁵⁸ ss 72, 74(1), RMA.

⁵⁹ National Policy Statement

⁶⁰ New Zealand Coastal Policy Statement

⁶¹ s75(3)(a)-(c), RMA.

⁶² One Plan – Part 1: Regional Policy Statement

⁶³ s74(2)(a), RMA.

⁶⁴ s74(2)(b)-(c), RMA.

⁶⁵ s74(2A), RMA.

⁶⁶ s74(3), RMA.

⁶⁷ s74(1)(f), RMA.

⁶⁸ s75(4), RMA.

⁶⁹ s74(2)(a)(ii), RMA.

⁷⁰ s75(1)-(2), RMA.

- e. the Council has obligations to prepare an evaluation report in accordance with s32 and have particular regard to that report⁷¹;
- f. the Council also has obligations to prepare a further evaluation report under s32AA where changes are made to the proposal since the s32 report was completed;

Objectives

- g. the objectives of the Plan Change are to be evaluated to the extent which they are the most appropriate way to achieve the Act's purpose⁷²;

Provisions

- h. the policies are to implement the objectives, and the rules (if any) are to implement the policies⁷³;
- i. each provision is to be examined as to whether it is the most appropriate method for achieving the objectives of the District Plan, by:
 - i. identifying other reasonably practicable options for achieving the objectives⁷⁴;
 - ii. assessing the efficiency and effectiveness of the provisions in achieving the objectives⁷⁵, including:
 - a) identifying and assessing the benefits and costs anticipated, including opportunities for economic growth and employment opportunities that may be provided or reduced⁷⁶;
 - b) quantifying those benefits and costs where practicable⁷⁷;
 - c) assessing the risk of acting or not acting if there is uncertainty or insufficient information about the subject matter of the provisions⁷⁸;

Rules

- j. in making a rule, the Council shall have regard to the actual or potential effect on the environment of activities, including (in particular) any adverse effect⁷⁹; and

Other Statutes

- k. the Council may be required to comply with other statutes.

3.10 Our powers in relation to this proposal are set out in clause 10 of Schedule 1 of the RMA. Under this clause, we may decide to decline the proposal, approve it, or approve it with modifications. We must give reasons for the decision that we reach. In arriving at our decision, we must undertake the further evaluation required under s32AA and have regard to that evaluation. As indicated above, the further evaluation under s32AA is required only in respect of any changes arising since the Plan Change was notified. This evaluation must:

⁷¹ Schedule 1, Part 1, Clause 10(4)(aaa), RMA.

⁷² s32(1)(a), RMA.

⁷³ s75(1), RMA.

⁷⁴ s32(1)(b)(i), RMA.

⁷⁵ s32(1)(b)(ii), RMA.

⁷⁶ s32(2)(a), RMA.

⁷⁷ s32(2)(b), RMA.

⁷⁸ s32(2)(c), RMA.

⁷⁹ S76(3), RMA.

- a. examine the extent to which the objectives of the Plan Change are the most appropriate way to achieve the purpose of the Act;
 - b. examine whether the policies, rules, standards, zoning and other methods of the Plan Change are the most appropriate way to achieve the existing District Plan objectives and the Plan Change's objectives;
 - c. in relation to 'b.' above, to the extent relevant:
 - i. identify any other reasonably practicable options for achieving the existing and proposed objectives; and
 - ii. assess the efficiency and effectiveness of the provisions in achieving the objectives; and
 - d. contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.
- 3.11 Further, in relation to matter 'b' above, we note that where the operative District Plan is concerned, the Plan Change seeks to amend Objective 3 in Section 7 (Subdivision), amend Objective 4 and introduce new Objectives '5' and '6' in Section 7A (Greenfield Residential Areas), introduce a new 'Objective 15' to Section 10 (Residential Zone) and a new 'Objective 6' to Section 11:10 (Local Business Zone). The objectives that we must evaluate the proposal against include these amended and new objectives as well as the broader suite of District Plan objectives set out in these sections as well as in Section 2 (City-wide Objectives), Section 6.3 (Earthworks), Section 9 (Rural Zone), Section 15 (Recreation), Section 20 (Land Transport), Section 22 (Natural Hazards) and Section 23 (Utilities).
- 3.12 Accordingly, under the heading **Objective and policy framework** at the end of this section, we have considered whether the proposed Plan Change:
- a. has been designed to accord with and assist the Council to carry out its functions so as to achieve the purpose of the RMA;
 - b. gives effect to any relevant NPS and the NZCPS;
 - c. gives effect to the RPS; and
 - d. is consistent with any regional plans; and
 - e. gives effect to a national planning standard.
- 3.13 In considering all of the matters above, we record that our decision is based upon our consideration of the following documents:
- a. the notified Plan Change and s32 evaluation as notified and subsequently amended;
 - b. the submissions and further submissions received;
 - c. the Council's Section 42A Reports;
 - d. the s32AA evaluations provided over the course of, and subsequent to, the hearing; and
 - e. the statements/presentations from all parties appearing before us.
- 3.14 As we emphasised at the hearing, it is important that all parties understand that it is not for us to introduce our own evidence on the issues listed and addressed in this section of our report, and we have not done so – rather, our role has been to:

- a. establish that all relevant evidence is before us (or where it isn't, consider whether we should commission additional reports or information⁸⁰); and
 - b. test the evidence of others, and to determine the most appropriate outcome based on the views we consider best achieve sustainable management.
- 3.15 It is that dual role to which the following evaluation addresses. Before doing so, and as a closing comment to this preamble, we observe that s32AA(1)(d)(ii) enables our further evaluation reporting to be incorporated into this report as part of the decision-making record. To this end, our evaluation of each issue has been structured to satisfy the evaluation report requirements of s32AA as outlined above⁸¹. In other words, inherent in our evaluation for each issue is our consideration of the merits of any proposed alterations to the notified provisions to assist in ascertaining the appropriateness of the provisions.

Specific matters requiring our evaluation

- 3.16 Having outlined our overall approach or 'end game' we can now set out the specific topics or issues that we seek to address in the first instance. Most of these relate to specific 'effects' topics but some also or otherwise relate to provision for certain activities or land use as part of the Plan Change.
- ISSUE 1: Ecological and indigenous biodiversity values and effects
 - ISSUE 2: Geotechnical constraints and natural hazard risks
 - ISSUE 3: Natural character, visual amenity and landscape values and effects
 - ISSUE 4: Stormwater management and effects
 - ISSUE 5: Recreational effects and provision for reserves
 - ISSUE 6: Transportation / traffic management and effects
 - ISSUE 7: Reverse sensitivity effects associated with the Rifle Rod and Gun Club
 - ISSUE 8: Effects contributing to climate change
 - ISSUE 9: Provision for a neighbourhood centre via the Local Business Zone
 - ISSUE 10: Provision for retirement villages
 - ISSUE 11: Other matters
- 3.17 All the above issues are dealt with in turn in the following sub-sections. In each case we start by **identifying the issue** with reference to relevant submissions, before framing the question or questions before us in relation to the topic concerned. We then set out a summary of the **evidence** available to us, including the recommendations of the Section 42A Report, and the content of initial evidence presented or tabled at the hearing. Finally, we outline how areas of contention between the parties may have been narrowed and, in some cases, resolved, as part of a **discussion** of the issue or sub-issue **and our findings** with respect to the question or questions we posed at the start.

⁸⁰ Under s 41C(4), RMA.

⁸¹ At para 3.10 of this report.

Issue 1: Ecological and indigenous biodiversity values and effects

Issue identification

- 3.18 In part, the purpose of PCG as summarised by Council officers is to protect and restore the natural values and ecological function of the gully features within the Plan Change area from inappropriate, subdivision, use and development⁸². It proposes to do this by vesting land to Council and rezoning gully areas, indigenous forest remnants and wetlands shown on the Structure Plan (Map 7A.4) to Conservation and Amenity Zone. The development of the Plan Change has been informed by an ecological assessment undertaken by Dr Forbes⁸³.
- 3.19 The approach taken to the Conservation and Amenity Zone is set out in Section 7A, proposed Objective 6 and Policies 6.1 – 6.7, Section 7, proposed Policy 3.7 and proposed Policies 1.5-1.7 in Section 15.5. The proposed new Policies 1.5-1.7 provide for the ongoing protection and management of these areas, and avoidance of structures, buildings and earthworks, unless these are required to establish roads and essential services through the gully areas.
- 3.20 Proposed amendments to the operative District Plan rules in Section 15.5 Conservation and Amenity Zone (R15.5.4.1 and R15.5.6.1) enable roading and essential services (as provided for in the Aokautere Structure Plan) to be constructed in the gully areas as a restricted discretionary activity. Any other earthworks in these areas is a non-complying activity. Effectively, any subdivision, use and development outside of informal recreation, maintenance and walking tracks will require resource consent under the District Plan and potentially also under Horizon's One Plan.
- 3.21 The policies signal a strong avoidance approach to adverse effects on these natural features when managing stormwater, risks from natural hazards, earthworks and buildings/structures. The policies also require conservation lots for the protection of SNA and wetlands to be created during subdivision (see recommended Policies 6.6 and 6.7, Section 7A), containing provisions to vest these areas with the Council; and introducing elevated consent status and new policies to guide consideration of activities in such locations.
- 3.22 The Plan Change drew submissions on matters related to ecological and indigenous biodiversity values and effects. These submission points were addressed in detail in the Section 42A Report⁸⁴ and were summarised as follows:
- a. support for the proposed approach to zone the gully networks to Conservation and Amenity Zone and to restore and enhance biodiversity;
 - b. opposition to the proposed amendments to the Rules in Section 15.5 Conservation and Amenity Zone which, as noted above, would have the effect of making roading and essential services provided for in the Aokautere Structure Plan, a restricted discretionary activity, and any other earthworks, a non-complying activity;

⁸² Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 238

⁸³ Aokautere Structure Plan: Ecological Features, Constraints and Restoration, Forbes Ecology, July 2021

⁸⁴ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 241 – 251

- c. a request that the Comprehensive Development Plan required at the point of subdivision include a performance standard requiring that any native planting is locally sourced;
- d. requests that the Council do more to protect indigenous habitats within the Plan Change area, in particular wetlands and mature canopy trees, including identifying indigenous bush remnants as SNA and protecting them with covenants, and undertaking proactive restoration and extension of these habitats;
- e. potential for urban development to:
 - i. have adverse impacts on in-stream ecosystems, in particular adverse effects from increased sediment, flooding and stormwater flows;
 - ii. bring unwanted pest species, invasive weeds and increase predation from domestic pets;
 - iii. have adverse effects on rare, threatened or at-risk habitats, and that activities which affect those habitats be managed under the Horizons One Plan; and
- f. a request for clarification as to how land zoned Conservation and Amenity Zone will be monitored, managed, fenced off and restored and what process the Council will use to acquire this land⁸⁵.
- g. support and opposition to the proposed approach to vesting land and managing activities located in the gully network.

3.23 To our minds, the concerns expressed by submitters on this topic raised fundamental s6(c) RMA matters concerning *the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna* that can be distilled into two essential questions that we need to reach findings on:

- a. *Are the ecological and indigenous biodiversity values over all or any part(s) of the site such that development should be avoided in these locations?*
- b. *Are the Plan Change provisions as now recommended formulated in such a way that ensures an appropriate level of protection to identified ecological and indigenous biodiversity values and/or means of managing effects on those values?*

3.24 These are the two fundamental questions we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

Evidence

3.25 Dr Forbes' Section 42A Report outlined site constraints associated with vegetation and wetlands in gullies, waterway hydro classifications, recommendations for gully restoration, and responses to submissions, including further assessment work undertaken⁸⁶.

3.26 Dr Forbes' undertook a high-level analysis of the ability to offset any adverse effects of recommended stormwater mitigation measures (in-stream stabilisation and erosion

⁸⁵ Section 42A Report of Anita Renie Coplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 237

⁸⁶ Section 42A Technical Report of Adam Sean Forbes on Behalf of Palmerston North City Council, Technical – Ecology, 15 September 2023

- protection works) to demonstrate there is sufficient availability of perennial and intermittent stream reaches⁸⁷.
- 3.27 Dr Forbes concluded that the Plan Change appropriately addresses the RPS, NPS-IB and the NPS-FM⁸⁸.
- 3.28 In her Section 42A Report, and based on the evaluation by Dr Forbes, Ms Copplestone recommended that the proposed Conservation and Amenity Zone over gullies, forest remnants and wetlands be retained, but also recommended a series of further amendments to the Plan Change provisions to address submissions on this topic⁸⁹. These recommended amendments can be summarised as follows:
- a. extending the proposed Conservation and Amenity Zone over identified forest remnants (F1 and F2), which would be classified as threatened habitats under Schedule F of Horizon's One Plan, and secondary habitats under the size threshold of Schedule F worthy of retirement, protection and restoration (F3 and F4);
 - b. further amending policies in Section 7A to more closely relate them to the objective to protect ecological and natural values of the gully network;
 - c. further amending policies in Section 15.5 to address indigenous forest areas and provide for the on-going operation of infrastructure; and
 - d. amending performance standard and assessment criteria R7A.5.2.2(a)(vii) to prioritise the selection of locally sourced native plant species for street plantings and address indigenous forest areas.
- 3.29 In supplementary evidence, Ms Copplestone recommended the following amendments to give effect to the NPS-IB (which was in draft form at the time of notification of the Plan Change):
- a. all references to 'indigenous forest remnants' are changed to 'indigenous biodiversity';
 - b. Objective 6 and Policy 6.4 in Section 7A are amended to include the requirement to 'maintain' indigenous biodiversity, consistent with the objective of the NPS-IB;
 - c. Policy 3.3 in Section 7A is amended to insert the words 'and development', so that this policy applies more broadly, beyond just earthworks;
 - d. Policy 1.7, Section 15.5 is amended to 'recognise the obligation and responsibility of care that tangata whenua have as kaitiaki of indigenous biodiversity' and 'the role of people and communities (including landowners) as stewards of indigenous biodiversity'; and
 - e. the assessment criteria in R15.5.4.1 are amended to be more consistent with the effects management hierarchy in the NPS-FM⁹⁰.
- 3.30 In recommending these and other more minor amendments, and otherwise concluding that no other amendments are required, Ms Copplestone relied in part on the evidence of

⁸⁷ Ibid., pages 16-17 and updated Table 3 dated 17/10/2023

⁸⁸ *Supplementary Statement of Dr Adam Forbes on behalf of Palmerston North City Council – Ecology*, 11 March 2024.

⁸⁹ *Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning*, 15 September 2023, pages 251 – 254

⁹⁰ *Supplementary Statement of Anita Copplestone on behalf of Palmerston North City Council – Planning*, 11 March 2024, para 39

Dr Forbes, for the Council⁹¹. We address Dr Forbes' position in more detail in our *Discussion and findings* section below in relation to ecological and biodiversity matters remaining in contention during the course of the hearing. However, we do so conscious of the fact that Dr Forbes' evidence was not contested by any equivalent expertise fielded on behalf of submitters.

- 3.31 At the hearing Dr Rosemary Gear and Mr Anthony Gear⁹² highlighted efforts over the last 34 years to protect and enhance the biodiversity values in Moonshine Valley, including planting the gully and undertaking bird and stream life surveys. They confirmed the presence of threatened freshwater species, 22 endemic and native bird species and geckos. They emphasised the importance of maintaining these biodiversity values.
- 3.32 Mr Thomas, a planner on behalf of Woodgate Ltd *et al.*, concluded, based on the evidence of Dr Forbes, that the Plan Change is consistent with the NPS-FM and the NPS-IB⁹³.
- 3.33 Mr Waters, on behalf of Ngawai Farms Ltd⁹⁴, confirmed his support for the proposed Conservation and Amenity Zone areas on their land (Gullies G14-G18 and Forest remnants F1-F4) on the basis any vesting and purchasing of the land was undertaken on a case-by-case basis; and that these will remain in private ownership now and, if the land is further developed, are expected to remain in private ownership⁹⁵.

Discussion and findings

- 3.34 As noted above, the first of the questions we need to reach a finding on is whether *the ecological and indigenous biodiversity values over all or any part(s) of the site are such that development should be avoided in these locations.*
- 3.35 It is entirely evident from the evidence of Dr Forbes that such values do exist, where the gully network, wetland areas and other areas of native vegetation identified in the ecological assessments accompanying the Plan Change are concerned⁹⁶. Dr Forbes did not resile from this position over the course of hearing.
- 3.36 We therefore find that there are identified (and identifiable) features within the Plan Change area that are of sufficient significance in terms of ecological and indigenous biodiversity value to warrant their protection but nothing to suggest that outside these areas, development needs to be avoided.
- 3.37 The second question we need to reach a finding on is whether *the Plan Change provisions as now proposed are formulated in such a way that ensures an appropriate level of protection to identified ecological and indigenous biodiversity values and/or means of managing effects on those values.*
- 3.38 Firstly, we note that in her supplementary statement, Ms Copplestone has recommended some further changes to the Plan Change provisions to more closely align with, and give effect to, the NPS-IB⁹⁷. She also indicated that she would not support the formal

⁹¹ Section 42A Technical Report of Adam Sean Forbes on Behalf of Palmerston North City Council, Technical – Ecology, 15 September 2023 and Supplementary Statement of Dr Adam Forbes on behalf of Palmerston North City Council – Ecology, 11 March 2024.

⁹² Submission S039

⁹³ Statement of Evidence of Paul Norman Thomas dated 27 October 2023, pages 18-19

⁹⁴ Submission S061

⁹⁵ Summary Statement of Ngawai Farms Limited (Stu Waters) dated 7 December 2023, page 1

⁹⁶ Section 42A Technical Report of Adam Sean Forbes on Behalf of Palmerston North City Council, Technical – Ecology, 15 September 2023 and Supplementary Statement of Dr Adam Forbes on behalf of Palmerston North City Council – Ecology, 11 March 2024

⁹⁷ Supplementary Statement of Anita Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, paras 37 – 39 and 41

identification of indigenous forest areas as SNA⁹⁸, as this would pre-judge the necessary assessment and engagement process required under the NPS-IB that the Council proposes to address on a City-wide basis outside the ambit of this Plan Change⁹⁹. At this point we concur and note that such an exercise is for a future time.

- 3.39 In terms of the second question, we were not presented with any evidence to suggest that Dr Forbes is anything other than comfortable with the form and effect of the Plan Change provisions, as now recommended by Ms Copplestone, as a means of protecting those ecological and indigenous biodiversity values and providing for the management of effects on them. Indeed, Dr Forbes provided us with some assurance following the hearing that the protection of the gully network would assist the Council in meeting its NPS-IB obligations to achieve greater than 10% native cover in urban and rural landscapes; and that there was ample length of unaffected waterways to address the likely scale of residual adverse effects arising from stream works for erosion and stormwater control through restoration to achieve a no-net-loss (or net gain) for freshwater biodiversity¹⁰⁰.
- 3.40 This naturally leads us to our second finding on these matters i.e., that, in broad terms, the Plan Change provisions will ensure an appropriate level of protection to identified ecological values and/or means of managing effects on those values. One of the key 'protection' and 'management' elements in the Plan Change package, where the gully network is concerned, is clearly the application of Conservation and Amenity Zone. However, we acknowledge the values that the zone seeks to protect and manage effects on, range wider than just those associated with ecological and indigenous biodiversity.
- 3.41 We therefore need to reach a finding as to the 'synthesising' role and form of the zone, which we propose to do under the **Most appropriate Plan Change provisions framework** heading below. There, we also consider the implications on ecological and indigenous biodiversity values of specific requests by PNIRD at a later point under the same heading. And finally, we consider the overall extent to which the Plan Change gives effect to the NPS-IB and the NPS-FM at an appropriate point in **Section 4** of our decision report, with reference to Dr Forbes' and Ms Copplestone's evidence.

Issue 2: Geotechnical constraints and natural hazard risks

Issue identification

- 3.42 The Plan Change recognises the area has highly complex landforms and typography, which are highly dynamic and continue to change as a result of the interaction between overland flows and soft, highly erodible soils; where gullies have been formed over time by the passage of water overland and in channelised waterways¹⁰¹. It also recognises the area has a complex range of slopes, with some slopes up to 20-30 degrees, that increase the risk for potential for land instability and associated geohazards. These geotechnical matters raise a matter of national importance under s6 of the RMA; namely the management of significant risks from natural hazards (s6(h)) that requires our careful consideration.
- 3.43 The potential for natural hazards to be present on the Plan Change site also represents a potential impediment to urban zoning and as such this aspect of the proposed Plan Change was appropriately the subject of a geotechnical assessment as part of its formulation and

⁹⁸ As requested by Forest and Bird, Submission S097

⁹⁹ *Supplementary Statement of Anita Copplestone on behalf of Palmerston North City Council – Planning*, 11 March 2024, para 40

¹⁰⁰ *Supplementary Statement of Dr Adam Forbes on behalf of Palmerston North City Council – Ecology*, 11 March 2024, paras 16 – 17

¹⁰¹ *Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning*, 15 September 2023, page 6

also as part of the post-notification process. Specifically, a geotechnical assessment prepared by geotechnical experts (Tonkin & Taylor) informs the Plan Change¹⁰². The assessment identifies potential geotechnical hazards associated with topography and makes recommendations to manage slope stability hazards.

- 3.44 Map 10.1 in the operative District Plan uses high level geotechnical mapping to identify 'Limited Developable Land' and 'Developable Land' in conjunction with specific provisions to manage geotechnical constraints and natural hazard risk. The Plan Change builds on this approach with the addition of Map 10.1A, which maps land hazard classes (A-C) and setback lines of 20 and 30 degrees from the base of slopes (to represent Class D and E land respectively). Recommended new provisions set out the resource consent (subdivision and land use) requirements for geotechnical investigations, reporting and recording limitations through consent notices before subdivision and for the assessment of uncontrolled fill. The proposed Structure Plan which spatially controls the location of development and associated linkages is configured so that no Class E land is shown as located within the areas proposed for residential development.¹⁰³
- 3.45 The Plan Change drew submissions on matters related to geotechnical constraints and natural hazards. These submission points are addressed in detail in the Section 42A Report¹⁰⁴ and were summarised as follows:
- a. the need for geotechnical assessment of how stormwater from development may increase erosion in downstream waterways and slippage of adjacent land in neighbouring Moonshine Valley and Whisky Way;
 - b. the need for details as to how the gully/low lying areas behind Johnstone Drive will be filled and made into buildable areas;
 - c. opposition to retention of Map 10.1 Aokautere Development Area in light of the addition of proposed Map 10.1A; and
 - d. opposition to new provisions requiring geotechnical investigations and reporting.
- 3.46 We recognise the interrelated nature of land instability issues and the effects of stormwater management on erosion/slippage in the gullies and waterways. Submission point d. above primarily relates to the potential erosion/slippage from stormwater management which is addressed in the Stormwater Effects and Management section below.
- 3.47 We consider the remaining concerns expressed by submitters on this topic relate to the following central question - *In what circumstances and/or at what point in the development process are requirements to address specific geotechnical constraints through investigations and reporting appropriately imposed?*
- 3.48 This is the question we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

¹⁰² Section 32 Report, July 2022, Appendix 9

¹⁰³ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 111–112

¹⁰⁴ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 107 – 115

Evidence

- 3.49 The evidence of Mr Bird considered slope instability as the main geotechnical hazard present but also addresses uncontrolled fill and liquefaction hazard (lower southwestern portion of the site along Valley Views and Turitea Road¹⁰⁵. His evidence also addressed submissions and further submissions relating to land instability and the influence of erosion and stormwater management.
- 3.50 Mr Bird's reply evidence further considered submitter requests to rezone 'Area A'¹⁰⁶ and 'Area B'¹⁰⁷ from Rural Zone to Rural-Residential Overlay. He did not support rezoning 'Area A' to Rural-Residential Overlay because it is low lying and current waterlogged/swampy conditions are likely subject to soft ground, shallow groundwater and possible liquefaction issues. Conversely, he supported rezoning 'Area B' to Rural-Residential Overlay given the hilly morphology and the large lot sizes should enable a building platform to be identified, or where necessary, engineered with earthworks. We address the overall merits of PNIRD's requests to rezone these areas under the heading **Most appropriate Plan Change provisions framework** later in this section of our report.
- 3.51 Mr Bird's supplementary evidence responded to submitter requests to rezone land, alternative road connections, gully crossing and works in the Conservation and Amenity Zone¹⁰⁸. He remained comfortable the proposed provisions will manage geotechnical constraints and natural hazards.
- 3.52 Ms Copplestone's Section 42A Report relied on the assessment by Tonkin & Taylor and the further review undertaken by GHD for potential erosion due to stormwater discharge in the gullies over time in response to submissions¹⁰⁹. Ms Copplestone's report confirmed the recommended changes to the notified provisions and her inclusion of clarification that Map 10.1A applies only within the Plan Change area reflected Mr Bird's advice¹¹⁰.
- 3.53 Ms Copplestone' supplementary evidence recommended further minor amendments to the provisions to ensure the geotechnical assessments required inform the stormwater management design.¹¹¹

Discussion and findings

- 3.54 The expert evidence of Mr Bird was uncontested by any equivalent expert evidence. We consider the verbal comments made at the hearing by Mr Out, on behalf of Heritage Estates (2000) Ltd, relaying the purported views of a colleague with geotechnical qualifications cannot be taken into account and are outside Mr Out's field of expertise.
- 3.55 Mr Bird's reply evidence confirmed his view that the Plan Change provisions recommended are sufficient to address the geotechnical and natural hazard risks

¹⁰⁵ Section 42A Technical Report of Eric Bird on Behalf of Palmerston North City Council - Geotechnical, 15 September 2023

¹⁰⁶ PNIRD (S045) requested that an area of approximately 7.5 ha adjacent to Turitea Road be rezoned from Rural Zone to Rural-Residential Overlay.

¹⁰⁷ PNIRD (S045) requested that an area of approximately 8.5 ha on the eastern boundary of the Plan Change Area from Rural Zone to Rural-Residential Overlay.

¹⁰⁸ Supplementary Statement of Eric Bird on behalf of Palmerston North City Council - Geotechnical, 11 March 2024

¹⁰⁹ Section 42A Technical Report of Allison Reiko Baugham and Tony Miller on Behalf of Palmerston North City Council - Stormwater, 15 September 2023, Appendix B: Stormwater Expert Evidence - Stream Erosion Assessment Summary

¹¹⁰ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 112 - 118

¹¹¹ Supplementary Statement of Anita Copplestone on behalf of Palmerston North City Council - Planning, 11 March 2024, para 56

associated with development of the land, including those relating to areas of uncontrolled filling and setbacks based on slope¹¹².

- 3.56 We turn our minds to the central question - *In what circumstances and/or at what point in the development process are requirements to address specific geotechnical constraints through investigations and reporting appropriately imposed?*
- 3.57 We accept Mr Bird's advice that no development should proceed without the benefit of a basic geotechnical assessment given the highly complex landforms, soil types and topography, which increases the risk of land instability and natural hazards.
- 3.58 We find the evidence of both Mr Bird and Ms Copplestone supports the view that geotechnical investigations should be undertaken at the time of resource consent for subdivision to inform site constraints and limitations, including potential off-site effects and the identification of any required mitigation measures. We are satisfied that the provisions in the notified Plan Change as bolstered by the additional provisions recommended from Ms Copplestone reflect this requirement for investigations and reporting at the resource consent stage.
- 3.59 Importantly, we find the recommended provisions will set up a planning and consenting framework that will appropriately avoid any built development in the gully areas, other than for roading and essential services; and prevent any further uncontrolled filling and unmanaged earthworks to minimise adverse effects on the gully systems.

Issue 3: Natural character, visual amenity and landscape values and effects

Issue identification

- 3.60 The natural character, visual amenity and landscape values and effects of development in the area bound by the Plan Change raised some consideration around the functions for councils set out in s7 of the RMA; notably *the maintenance and enhancement of amenity values* (s7(c)) and *the maintenance and enhancement of the quality of the environment* (s7(f)). These represent matters that all persons exercising functions and powers under the RMA in relation to managing the use, development, and protection of natural and physical resources, are required to have particular regard to.
- 3.61 In terms of the above context, the Plan Change provides for the protection and restoration of the gully networks and their utilisation for public recreation and stormwater management as Conservation and Amenity Zone.
- 3.62 The Plan Change provides for clusters of multi-unit developments (attached 2-3 storey town houses) to be established on five promontories along the eastern side of the Plan Change area, adjacent to the Moonshine Valley. This type of housing is enabled by the Structure Plan and recommended provisions.
- 3.63 A Landscape and Visual Assessment prepared by Hudson Associates Landscape Architects informed the Plan Change¹¹³. It reviewed the existing character of the site and locality, identifying and evaluating existing landscape attributes; and considered the likely effects of urbanisation on the s7 matters identified above; namely the landscape character and visual amenity within the Structure Plan area. It identified ways in which the landscape

¹¹² Statement of Reply Evidence of Eric Bird on Behalf of Palmerston North City Council, Geotechnical, 28 November 2023

¹¹³ Section 32 Report, July 2022, Appendix 10

and appreciation of its character can positively contribute to future development; and recommended landscape areas to be protected.

- 3.64 The submission points relating to amenity effects on Moonshine Valley were addressed in detail in the Section 42A Report¹¹⁴ and were summarised as follows:
- a. multi-unit and multistorey development on the promontories will have adverse impacts on the landscape, character and amenity of the adjoining Moonshine Valley Rural Residential area, which is recognised as a ‘special character area’ in the District Plan;
 - b. concerns regarding invasion of privacy due to overlooking and visual dominance, and loss of the sense of spaciousness, which is inconsistent with operative District Plan provisions;
 - c. requests that multi-unit and multi-storey housing is excluded from the promontory locations, or greater setbacks are imposed for dwellings;
 - d. requests for a ‘transition area’ to be maintained adjacent to Moonshine Valley to provide for a graduation between intensively developed residential areas and the rural residential properties of Moonshine Valley.
- 3.65 Submission points relating to other amenity effects were addressed in detail in the Section 42A Report¹¹⁵ and were summarised as follows:
- a. avoid excessive use of high fences, which create a ‘gated community’, and screen buildings with trees instead;
 - b. restrict all future housing to single storey; and
 - c. avoid housing development to the rear of Johnstone Drive, to maintain the rural setting and visual amenity.
- 3.66 To our minds, the concerns expressed by submitters on this topic are encapsulated by the following two key questions:
- a. *Does the future development enabled by the Plan Change sufficiently avoid, remedy and mitigate the potential adverse effects on natural character, landscape and visual amenity values?*
 - b. *Putting aside the inevitable changes in natural character, visual amenity and landscape values that will generally result from the urbanisation across the Structure Plan area facilitated by the Plan Change, to what degree and to what extent do adverse effects on those values enjoyed by residents of the adjoining Moonshine Valley Rural Residential Area need to be addressed?*
- 3.67 We now turn our minds to these key questions in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

¹¹⁴ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 263 – 267

¹¹⁵ Ibid., pages 263, 267 – 268

Evidence

- 3.68 The evidence of Mr Hudson identified the special characteristics of the Plan Change area and confirmed these were recognised in the Structure Plan configuration¹¹⁶. He considered the recommended layout followed current landscape design principles in terms of preservation of landscape character, connectivity in terms of roading layout, stormwater capture and treatment, and housing density.
- 3.69 Mr Hudson assessed potential adverse effects on outlooks and privacy from overlooking, and potential impacts on visual amenity values from Moonshine Valley, Polson Hill, Turitea Valley, Aokautere and the Waters property¹¹⁷. He highlighted that being able to see housing development did not of itself constitute an adverse effect and that there is no requirement to preserve someone's existing views or rural outlook.
- 3.70 To limit the effects on Moonshine Valley residents, in response to concerns from submitters living in that locale¹¹⁸, Mr Hudson recommended the following mitigation:
- a. revising the indicative configuration of lots on the promontories, so that any future buildings would be placed further away from the edge of the escarpment;
 - b. imposing a setback of 15m for dwellings from the lot boundaries with the Moonshine Valley; and
 - c. limiting the heights of dwellings to 9m, rather than the 11m in the notified Plan Change provisions.
- 3.71 Further to the above, Mr Hudson's reply evidence reiterated his earlier view that a 15m set back of buildings from the property boundary adjacent to properties in Moonshine Valley is sufficient to address any landscape character issues and potential privacy reductions from dwellings on the promontories overlooking. He did not consider a transitional Rural-Residential Zone on the promontory ends or a planted buffer zone to be necessary given the 15m setback¹¹⁹.
- 3.72 Ms Copplestone's Section 42A Report recommendations were consistent with the expert evidence of Mr Hudson. She highlighted the 15m setback imposed from lot boundaries shared with properties in the Moonshine Valley Rural Residential Area on the promontories labelled D1 – D4 on the Structure Plan, with an additional setback standard to reflect this inserted into the rule¹²⁰. She also proposed a new policy and associated assessment criteria to Rule R10.6.3.3 addressing the potential for multi-unit development requiring mitigation of any adverse overlooking or visual dominance¹²¹.
- 3.73 Ms Copplestone's supplementary evidence recommended further minor amendments to give natural landforms and their associated landscape values (as well as conservation, amenity, cultural and indigenous biodiversity values associated with the gully networks) greater prominence in the proposed provisions by only enabling works in gully areas

¹¹⁶ Section 42A Technical Report of John Hudson on Behalf of Palmerston North City Council, Landscape, 15 September 2023

¹¹⁷ Section 42A Technical Report of John Hudson on Behalf of Palmerston North City Council, Landscape, 15 September 2023, page 10

¹¹⁸ Nathan Meyer (SO36), Rosemary and Anthony Gear (SO39), Gill Welch (SO49), Steve Welch (SO65), Brett Guthrie (SO41), Ee Kheng Ang (SO30), Lew Thompson (SO37), Marie Thompson (SO38), Larry Harrison (SO53), Steve Welch (OS65), Barry Scott (SO54), Elizabeth Fisher (SO80), Colin Perrin (SO90), Tracey Yung (SO92) and Sara Burgess (SO98).

¹¹⁹ Statement of Reply Evidence of John Hudson on Behalf of Palmerston North City Council, Landscape, 28 November 2023

¹²⁰ R10.6.1.5

¹²¹ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 268-269

where these are necessary to give effect to the Structure Plan; and including these values as a matter of discretion in assessing proposed roading and essential services¹²².

- 3.74 At the hearing, Ms Gill Welch¹²³ highlighted her and her husband's concerns regarding adverse effects on their visual amenity values and loss of their sense of privacy currently enjoyed.
- 3.75 Dr and Mr Gear acknowledged the now proposed 15m setback, reduced height of buildings of 9m and removal of prescription for medium density housing on the promontories, support by themselves and other residents who had signed their provided petition¹²⁴.
- 3.76 Mr Brett Guthrie¹²⁵ spoke to his submission at the hearing, highlighting the special character values of Moonshine Valley. He supported the recommended 15m setback, 9m height restriction and a greater flexibility of housing types rather than by prescription. He considered this combination of factors would ameliorate the 'hard edge' between the development and Moonshine Valley. However, he maintained the view that medium density housing should not be located on the promontories, primarily due to visual effects.

Discussion and findings

- 3.77 The expert evidence of Mr Hudson was uncontested by any equivalent expert.
- 3.78 In considering the first key question – *Does the future development enabled by the Plan Change sufficiently avoid, remedy and mitigate the potential adverse effects on natural character, landscape and visual amenity values* - we accept the clear view of Mr Hudson that the flat terraces and contrasting gullies are the key landscape characteristics that define Aokautere landscape character within the Structure Plan area.
- 3.79 Associated with this, we find the Structure Plan appropriately recognises the natural character and landscape values of the waterways and gully network and protects these values through the delineation of the Conservation and Amenity Zone. The recommended provisions in the zone will provide a planning framework that will assist in avoiding further inappropriate development in these areas, except for necessary roading and essential services infrastructure which is sensitively designed.
- 3.80 We find that retaining and restoring the gully character and views of them will contribute to a high level of amenity and quality lifestyle, while providing for stormwater management and opportunities for enhanced public cycle and pedestrian networks. We accept Mr Hudson's view in response to submitters' concerns and our questions, that the Plan Change will improve the natural character of the gullies.
- 3.81 Importantly, we find the Plan Change recognises the need to preserve the natural character of waterways and their margins and, where this has been degraded, provide for their restoration and enhancement. We agree with Mr Hudson that the Plan Change is the most appropriate way to achieve the RMA s6 and s7 matters associated with the preservation of natural character and the maintenance/or enhancement of amenity values and the quality of the environment.

¹²² *Supplementary Statement of Anita Copplestone on behalf of Palmerston North City Council – Planning*, 11 March 2024, para 58

¹²³ Submission SO49

¹²⁴ Hearing Statement of Rosemary Gear and Anthony Gear (Submission SO39), dated 8 December 2023

¹²⁵ Hearing Statement of Brett Guthrie (Submission SO41), undated

- 3.82 We find the Plan Change addresses visual amenity effects generally through the use of performance standards, with appropriate restrictions on fence heights and limiting fencing at the rear of properties where this has the potential to have an adverse effect on the gully areas. We agree with Ms Copplestone that limiting future dwellings to a single storey would not be consistent with giving effect to the NPS-UD or an efficient use of land to provide for the housing needs of the City.
- 3.83 We now consider the second key question - *Putting aside the inevitable changes in natural character, visual amenity and landscape values that will generally result from the urbanisation across the Structure Plan area facilitated by the Plan Change, to what degree and to what extent do adverse effects on those values enjoyed by residents of the adjoining Moonshine Valley Rural Residential Area need to be addressed?*
- 3.84 We find the proposed 15m setback from the property boundary with adjacent properties in Moonshine Valley of any buildings on the promontories labelled D1 – D4 on the Structure Plan is sufficient to mitigate any potential adverse on visual amenity and the special character values enjoyed by residents in Moonshine Valley. We note this is consistent with the District Plan requirement of a 10-15m setback from the escarpment edge for all buildings and structures in order to reduce visual intrusion of buildings when viewed from Turitea Valley. We do not consider a ‘transition area’ is required to maintain the special character values of Moonshine Valley.

Issue 4: Stormwater effects and management

Issue identification

- 3.85 The Plan Change provides an opportunity for the Council to address the historical resource management issues and challenges that have arisen in part from a lack of overall direction and integration of ad-hoc development over time¹²⁶. The Council (and many submitters) consider that the lack of integration of stormwater management is resulting in adverse effects on the surrounding environment, particularly the gully network.
- 3.86 The Plan Change seeks to address matters relating to the management of stormwater originating from the entire Structure Plan area, including areas of existing development and areas proposed for new development.
- 3.87 The Plan Change as notified included comprehensive provisions to address stormwater management and to mitigate flood risk, including implementation of a Stormwater Management Strategy with specified key stormwater design principles to be applied and a high-level conceptual design for stormwater controls. The controls proposed include measures to:
- a. reduce the shear stress, velocity and duration of flow events in the streams that exceed their respective erosion threshold;
 - b. prevent uncontrolled overland flows down the gully slopes as, due to their steepness and soil composition, these slopes are sensitive to erosive forces and present a potential slope instability and erosion risk if stormwater flows are not controlled; and

¹²⁶ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 17

- c. prevent encroachment of development on critical slopes, which can cause further disturbance and impact to vegetation and slope stability¹²⁷.
- 3.88 The Stormwater Management Strategy prepared by GHD informed the notified Plan Change¹²⁸. The GHD report presented the outcomes of stormwater analyses undertaken (flood, erosion and water quality assessments) and recommends stormwater management controls to collectively achieve the established design criteria for the entire Structure Plan area.
- 3.89 The Stormwater Management Strategy recommended the following design criteria:
 - a. control of runoff peak flows to pre-development levels for the 2-year, 5-year, 10-year, 20-year, 50-year and 100-year ARI flows, to control flood risk (i.e., hydraulic neutrality);
 - b. further control of peak flows as needed to match the pre-development erosion threshold exceedance, measured using a cumulative effective work index, in the Aokautere Church Stream (Gully 1), Moonshine Valley Reserve Stream (Gully 3), and Tutukiwi Reserve Stream; and
 - c. treatment of the 90th percentile rainfall volume from impervious developed areas through a stormwater treatment device or multi-device system.
- 3.90 Issues raised in submissions relating to stormwater, flooding and erosion issues were summarised in the Section 42A Report¹²⁹ as follows:
 - a. the potential for development of housing along the promontories/edges of the gullies to increase overland flows from stormwater, causing downstream flooding, erosion and landslides/slips;
 - b. the exacerbation of flooding and erosion in downstream waterways from further development within the catchment;
 - c. potential downcutting and erosion of gullies, land slips, damage to existing infrastructure (stormwater and roading), damage to private property, walkways and reserves;
 - d. the adverse effects of increased sediment and stormwater flows on in-stream and terrestrial ecology in the gully areas;
 - e. inadequate consideration of the effects of climate-change, including increases in intensity and frequency of rainfall;
 - f. inadequate sizing of stormwater detention ponds and the potential for failure in seismic events and in periods of high rainfall, causing damage to downstream properties; and
 - g. increases in impermeable surfaces from urban development and suitable controls to address increased stormwater volumes.
- 3.91 Following receipt of submissions, GHD undertook further analyses to confirm the modelling assumptions and level of conservatism; considered the potential and

¹²⁷ Ibid., page 80

¹²⁸ Section 32 Report, July 2022, Appendix 11

¹²⁹ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 78-79

consequences of an over design event; and reviewed the Stormwater Management Strategy and proposed mitigation measures¹³⁰.

- 3.92 We consider the concerns expressed by submitters on this topic can be distilled into the following central question - *Do the recommended Plan Change provisions provide sufficient means to address increased sedimentation, stormwater volumes and overland flows resulting from urbanisation; and mitigate and otherwise manage flooding, gully downcutting, erosion and land slips, adverse effects on in-stream ecology, and damage to downstream properties, infrastructure and community facilities?*
- 3.93 We note at this point that the extent to which certain stormwater elements should remain 'fixed' or 'flexible' arose during the course of the hearing. This goes to the overall issue over the balance between prescriptiveness and flexibility in the Plan Change; a matter we address under the heading **Most appropriate Plan Change provisions framework** below.
- 3.94 The *above question* is the one we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

Evidence

- 3.95 The Section 42A Report of Ms Baugham and Mr Miller addressed stormwater management and flooding risk. It outlined the technical analyses and modelling undertaken to assess potential effects on flooding, erosion and water quality in the downstream receiving environment. It also outlined further modelling, analyses and reviews undertaken in response to submissions.
- 3.96 Ms Baugham and Mr Miller highlighted the collaborative, multidisciplinary process to investigating and selecting stormwater mitigation options which had prioritised avoidance and nature-based solutions as far as possible, including the following proposed stormwater management controls:
- a. revegetating the gullies to help reduce the risk of erosion;
 - b. avoiding direct discharge of stormwater runoff over the gully slopes through a stormwater perimeter swale prescribed within the District Plan provisions;
 - c. reducing the impervious area limit as much as practicable to be 40% minimum permeable area for suburban areas and 25% for medium density.
 - d. an overall higher percentage of permeable area within the Structure Plan area (estimated to be 37%) than the operative standard currently set in the District Plan of 30%;
 - e. implementing water sensitive design elements to retain/reduce stormwater runoff on the plateaus, as well as incorporating additional storage within them to reduce the size of detention ponds;
 - f. incorporating larger detention ponds that avoid areas of moderate to very high vegetative constraints and are located offline as far as practicable; and

¹³⁰ Section 42A Technical Report of Allison Reiko Baugham and Tony Miller on Behalf of Palmerston North City Council, Stormwater, 15 September 2023, page 13 and Appendices B, C and D.

- g. implementing in-stream stabilisation and erosion protection measures in limited reaches to reduce steep gradients and slow flow velocities¹³¹.
- 3.97 Ms Baugham and Mr Miller outlined the instream stabilisation and erosion protection measures required in Gully 1 and Gully 3, and engineering work options such as use of below ground dams, cascade weirs and attenuation/detention dams to reduce velocities and sediment transport during rainfall events¹³².
- 3.98 Ms Copplestone's Section 42A Report relied on the technical expertise of GHD and the evidence of Ms Baugham and Mr Miller in recommending the following:
- a. a requirement for stormwater infrastructure to control post-development peak flow rates to pre-development levels, with flood control provided for the full range of ARI events, from 2-year to 100-year events, provided through provision of sufficient storage volume for peak flows, via wet and dry detention ponds;
 - b. further control of peak flows to prevent the erosion threshold being exceeded in the receiving streams, to be achieved through stormwater detention ponds with sufficient volume to hold peak flows and provide for regulated release;
 - c. identification of the preferred location of detention ponds, with the indicative location of ponds shown on the Structure Plan to maximise developable areas, with locations selected which were ecologically less sensitive and avoid high value terrestrial vegetation or wetlands, and a preference that ponds were placed off-line where possible, or if on-line, within ephemeral rather than intermittent or permanent stream reaches;
 - d. a continuous perimeter swale along gully edges (to be located where slope angles were approximately 25 degrees) to intercept, collect and convey overland flows to a centralised discharge location on the gully floor, rather than allowing uncontrolled flows down gully slopes;
 - e. imposing a buffer or setback from the top of the slope, to prevent encroachment of development and provide a utility corridor of sufficient width to accommodate a perimeter swale, and safe access for maintenance;
 - f. all rainfall falling on roads to be collected and contained within the roading corridor.
 - g. setting impervious limits on development;
 - h. a requirement for effective treatment of potential contaminants (treatment of the 90th percentile rainfall volume) including suspended solids, metals, petroleum hydrocarbons, nutrients and other organic compounds, with flexibility to employ either a single treatment device (wetland, dry pond) or multi-device treatment train approach; and
 - i. promotion of an integrated approach to stormwater management features to achieve high amenity outcomes, such as incorporating rain gardens or wetlands into public amenity spaces¹³³.
- 3.99 Ms Copplestone outlined additional mitigation proposed after submissions were received to address erosion in the gully systems based on this further analysis by GHD. She

¹³¹ Section 42A Technical Report of Allison Reiko Baugham and Tony Miller on Behalf of Palmerston North City Council, Stormwater, 15 September 2023, para 55.

¹³² Ibid., para 56

¹³³ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 80

considered this additional mitigation and the Stormwater Management Strategy represent a 'package of measures' to reduce the volume and velocity of stormwater runoff, involving:

- a. avoiding direct discharge of stormwater over gully edges - via a requirement for a perimeter stormwater swale, which will be located in a 5m utility corridor;
- b. limiting impervious areas within new development to reduce the increase in stormwater runoff, with a performance standard of 40% permeable surface per net site area (suburban areas) and 25% for (medium density areas);
- c. adopting a dual function for the proposed water sensitive design elements, to further detain and slow the release of stormwater from the plateaus, by incorporating stormwater storage within the raingardens required as part of the new streets;
- d. avoiding engineering works in areas of moderate to very high vegetative constraint;
- e. locating attenuation ponds offline as far as practicable;
- f. enlarging the proposed stormwater detention ponds to increase holding capacity and slow the rate of discharge, to reduce the risk of downstream erosion;
- g. implementing in-stream stabilisation measures in limited reaches of the receiving streams, to reduce the steep gradients of these reaches and reduce velocity of flows; and
- h. revegetating the gully sides with native vegetation that is resilient to erosion, with an aim to restore forest canopies to assist to mitigate the energy of large rain events¹³⁴.

3.100 Based on the above, Ms Copplestone highlighted that the proposed stormwater approach was purposely designed to:

- a. adopt an integrated approach on a catchment wide basis;
- b. improve health and wellbeing of degraded waterbodies and freshwater ecosystems;
- c. avoid loss of river extent and values to the extent practicable; and
- d. manage effects on freshwater values by applying the effects management hierarchy¹³⁵.

3.101 In response to questions during the hearing, Ms Copplestone's supplementary evidence recommended amendments to Objective 4 of Section 7A and a new implementing policy ('Policy 4.6') that seeks to avoid more than minor adverse effects of stormwater runoff on the gully network and its associated values¹³⁶.

3.102 Mr Les Fugle presented his written statement at the hearing, on behalf of Woodgate Ltd *et al*¹³⁷, opposing the addition of further stormwater rules to the District Plan¹³⁸. He considered the provisions were unnecessary given the existing District Plan provisions

¹³⁴ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 81-82

¹³⁵ Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, para 48

¹³⁶ Ibid., para 134

¹³⁷ Submission S058

¹³⁸ Brief of Evidence of Les Fugle dated 4 November 2023

and the RMA requirements. He referred to a resource consent application for construction of a stormwater retention dam that had been lodged with the Council and considered this would be sufficient to accommodate and control stormwater from land owned by Woodgate Ltd *et al.*

- 3.103 Mr Thomas, on behalf of Woodgate Ltd *et al.*, considered the requirement for a Stormwater Management Plan as a performance standard was inappropriate on the basis that Council is taking responsibility for the in-gully construction and management of stormwater infrastructure¹³⁹.
- 3.104 Mr Jack Out, on behalf of Heritage Estates (2000) Ltd¹⁴⁰, provided a statement of evidence opining the stormwater analysis was 'incomplete' and that the Structure Plan cannot be confirmed due to the controls being subject to change¹⁴¹. In response to questions at the hearing, he acknowledged he had not considered the further technical work undertaken by GHD or the conceptual plans showing key stormwater controls.
- 3.105 Ms Coats, on behalf of Heritage Estates (2000) Ltd, considered the documentation in general was missing fundamental information, including that relating to stormwater infrastructure labelling and cross refencing on the Structure Plan¹⁴².
- 3.106 Mr Bruce Wilson¹⁴³ presented a statement emphasising the importance of Horizons and the Council working closely on any future gully infilling and stormwater management, and to ensure compliance with the conditions of the Structure Plan and consents.
- 3.107 Dr and Mr Gear¹⁴⁴ appeared at the hearing emphasising the accelerated erosion damage and sediment deposition in Moonshine Valley from recent development in the upstream catchment. They highlighted the need for careful consideration in locating stormwater ponds and swales to avoid overland runoff and siting on unstable, erodible slopes; and for monitoring and enforcement of the minimum permeable areas.¹⁴⁵
- 3.108 In her reply evidence, Ms Copplesstone:
- a. addressed the timing of vesting, recommending minor amendments to proposed 7A. Policy 6.5 in response to Ms Pilkington¹⁴⁶;
 - b. confirmed Council is seeking early vesting of gullies (at the time of subdivision) to provide for their protection and restoration in recognition that these are sensitive receiving environments; and
 - c. highlighted that the Plan Change provides flexibility for the exact location of the boundary with the Conservation and Amenity Zone so this can be confirmed on subdivision, once the location of the perimeter swale has been confirmed and a decision made whether the swale corridor will be vested in Council or remain in private ownership¹⁴⁷.

¹³⁹ Statement of Evidence of Paul Norman Thomas dated 27 October 2023, paras 85-86

¹⁴⁰ Submission S051

¹⁴¹ Stormwater Statement of Evidence of Jack Out on behalf of the submitter Heritage Estates (2000) Limited, undated

¹⁴² Statement of Evidence of Amanda M. Coats on behalf of the submitter Heritage Estates (2000) Limited undated, para 10

¹⁴³ Submission S0105

¹⁴⁴ Submission S039

¹⁴⁵ Statement Dr and Mr Gear dated 26 October 2023

¹⁴⁶ Statement of Reply Evidence of Anita Renie Copplesstone on Behalf of Palmerston North City Council, Planning, 28 November 2023, paras 34-35

¹⁴⁷ *Ibid.*, para 81

- 3.109 In reply, Ms Copplestone recommended minor amendments to the provisions (relying on Ms Baugham's¹⁴⁸ view that the provisions could better clarify the proposed gully setbacks of 5m provide for a specified *maximum* corridor width required to enable a perimeter stormwater swale to be constructed where residential lots adjoin a gully edge. Ms Copplestone highlighted that the actual location of the swale is intended to be responsive to actual land topography and stability and geotechnical reporting¹⁴⁹.
- 3.110 Ms Copplestone disagreed with Mr Thomas that the requirement for a Stormwater Management Plan as a performance standard was inappropriate, as the Council only intended to take responsibility for delivery of the discrete works identified in Gully 1 and 3; and the majority of the stormwater infrastructure would be delivered by developers. On this basis, she considered the requirement for a Stormwater Management Plan as a performance standard should be retained, as it would be needed to demonstrate how developer-led infrastructure will be delivered and how subsequent connections will be made to the Council's receiving infrastructure. She noted that where Council does not yet own the land, the 'mechanism' to enable delivery of Council-led infrastructure would be via a developer agreement¹⁵⁰.

Discussion and findings

- 3.111 We turn our minds to the key question - *Do the recommended Plan Change provisions provide sufficient means to address increased sedimentation, stormwater volumes and overland flows resulting from urbanisation; and mitigate and otherwise manage flooding, gully downcutting, erosion and land slips, adverse effects on in-stream ecology, and damage to downstream properties, infrastructure and community facilities?*
- 3.112 The starting point for us is acknowledging that the Plan Change as notified recognised the sensitivity of the receiving environment to erosion, particularly Aokautere Church Stream and Moonshine Valley Reserve Stream which have very low erosion thresholds. We also record that the Stormwater Management Strategy seeks to mitigate erosion impacts by reducing the shear stress, velocity and duration of flow events to below the erosion thresholds in these streams by using detention to reduce peaks and release volumes over time. It also recognises the need to avoid uncontrolled overland flows down gully slopes to prevent slope instability and erosion.
- 3.113 We acknowledge that stormwater runoff from the existing development is having an adverse impact on downstream receiving environments and that this needs to be addressed in conjunction with the proposed new development. This was the focus of many submissions received and was evident on our site visits. We accept that the evidence shows that the 'package of measures', including in-stream stabilisation works, is an appropriate integrated management approach to existing degradation in the receiving environment and to enable further development.
- 3.114 We find that:
- a. the recommended Plan Change provisions, the conceptual design represented in the Structure Plan Map 7A.4 and implementation of the Stormwater Management Strategy will avoid, remedy and mitigate existing and potential adverse effects, manage flooding, gully downcutting, erosion and land slips, adverse effects on in-

¹⁴⁸ Statement of Reply Evidence of Allison Reiko Baugham dated 28 November 2023, paras 18 – 20, 67

¹⁴⁹ Statement of Reply Evidence of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 28 November 2023, para 86

¹⁵⁰ Ibid., para 77

stream ecology, and damage to downstream properties, infrastructure and community facilities; and that

- b. the technical analyses undertaken by GHD are sufficiently conservative and take into account the effects of climate change on future rainfall events. We note the further review of rainfall data near the Plan Change area and confirmation that the period of assessment included significant rainfall events in 2004, 2015 and 2023¹⁵¹. We accept the peak intensity adopted for the 1% AEP event used in the modelling for the Stormwater Management Strategy (i.e. 100-year ARI including climate change) is consistent with accepted best practice.

3.115 We find Mr Out's evidence raised high-level concerns of a very general nature that are not supported by the technical evidence before us.

3.116 Overall, we conclude that the recommended Plan Change provisions provide sufficient means to address potential stormwater and flooding that will result from urbanisation.

Issue 5: Recreational effects and provision for reserves

Issue identification

3.117 The Plan Change makes provision for open space that reflects the updated minimum standards for reserves in the Council's Engineering Standards for Land Development¹⁵²; and creates opportunities for new and enhanced pedestrian and cyclist connections by enabling use of the Conservation and Amenity Zone created over the gully network¹⁵³.

3.118 The Section 42A Report¹⁵⁴ summarised the submissions received in relation to the gully networks and public recreational use as follows:

- a. both opposition and support for the proposal to rezone, acquire and manage the gully networks and wetlands, and utilise these areas for public recreational use;
- b. concern about the ability of Council to access, restore and adequately maintain the gully networks, including preventing weed infestations;
- c. potential impacts of the walkway network on the privacy and safety of residents;
- d. request for an additional walkway connection from Abby Road through to the Moonshine Valley Reserve; and
- e. provide for gullies to be vested where they are contiguous to an area of land sought to be developed, rather than at the earliest point of subdivision.

3.119 The Section 42A Report¹⁵⁵ also summarised the submissions received in relation to the provision of parks and open space:

- a. retain the remaining areas of Aokautere as green space/open space, rather than providing for more housing development;

¹⁵¹ Section 42A Technical Report of Allison Reiko Baugham and Tony Miller on Behalf of Palmerston North City Council, Stormwater, 15 September 2023, para 42

¹⁵² Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 287

¹⁵³ Section 32 Report, July 2022, Appendix 13, Figure 15, page 15

¹⁵⁴ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 281

¹⁵⁵ Ibid., page 281

- b. retain Adderstone Reserve for open space/reserve purposes, rather than repurpose parts of this reserve for housing;
- c. ensure that multi-unit or medium density housing within Aokautere is sufficiently served by green space, parks and playgrounds that can accommodate families which do not have access to private amenity space;
- d. include additional flat recreational reserves in the Plan Change area to ensure there is adequate distribution of recreational areas for small-scale and informal play and to facilitate community connection;
- e. include facilities for skating and formal sports activities (sports fields);
- f. ensure that open space/reserve provision is consistent with the Council's Greenfields Reserve Criteria; and
- g. ensure future development in the Plan Change area does not impact on recreational use of Turitea Road.

3.120 Many of the matters raised in relation to the Conservation and Amenity Zone have already been addressed throughout this decision in our consideration of ecological and biodiversity values, stormwater management, and natural character and landscape values. The Plan Change provides for future opportunities for the Council to use the gully network for public recreational use. We consider how this is achieved in terms of alternatives, access, restoration and maintenance works is a matter for the Council that can be achieved through implementation plans.

3.121 Similarly, we consider issues raised by submitters relating to land acquisition, financial contributions, and compensation are not matters for our consideration of recreation effects and the provision of reserves.

3.122 In considering the submissions, we consider the key question that we need to reach a finding on is - *Do the Plan Change provisions recommended provide for the creation of a suitable network of reserves in terms of their purpose, extent, location and activities enabled therein that aligns with the nature and density of urban development otherwise facilitated?*

3.123 We note at this point that the extent to which to location of certain reserves should remain 'fixed' or 'flexible' arose during the course of the hearing. This goes to the overall issue over the balance between prescriptiveness and flexibility in the Plan Change; again, a matter we address under the heading **Most appropriate Plan Change provisions framework** below.

3.124 The *above question* is the one we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

Evidence

3.125 The evidence of Mr Phillips concluded that:

- a. reserve provision in the Plan Change area will be appropriate and well distributed through the area;
- b. the combination of flat, open, play friendly spaces and stormwater/ecological reserves with walkways will provide excellent amenity and recreation opportunities comparable to the existing Aokautere residential areas;

- c. The retention and development of the entire 2.4 ha open space portion of Adderstone Reserve, off the end of Abby Road, and inclusion of a suburb reserve of 8,900m² of flat open space in the southern portion of the Plan Change area, will ensure the larger format, casual, sport-type play needs are met;
- d. the provision of plantings through the gully network will provide extensive amenity and ecological value, supporting and enhancing the recreational values of the planned walkways; and
- e. the viability of certain connections indicated as ‘possible connections’ on the proposed Reserves and Walkway Plan will be subject to confirmation during the development stage, from a reserves management perspective (depending on site-specific geotechnical assessment, design, and cost/benefit analysis, particularly in the northern, steepest parts of the gullies between the promontories)¹⁵⁶.

3.126 Mr Phillips advised that additional work was undertaken after the Parks and Reserves Assessment was prepared which has since resulted in some changes to the recommended reserves and walkways. He noted that the identification of a 5,000m² neighbourhood reserve (Reserve #4) within the Plan Change area will meet the size (4,500m²) and walking distance standards (400m walking distance) proposed by the Council through a medium density plan change currently being prepared by Council¹⁵⁷.

3.127 In supplementary evidence, Mr Phillips outlined the existing and proposed reserves within the Plan Change area. He noted that the identified neighbourhood reserve (Reserve #2) is 3,400m² but that this is adequate given it is adjacent to the gully, has adequate road frontage and there is the opportunity for a walkway connection¹⁵⁸. He recommended enabling flexibility in the ability to relocate this reserve depending on the density of housing developed on the promontories.

3.128 Mr Phillips confirmed that the proposed reserves shown on the Structure Plan are consistent with the city’s overall 500m walking distance percentage cover achieved (80%) for residential lots and a 400m walking distance from a neighbourhood reserve for medium density housing¹⁵⁹.

3.129 Dr Chris Teo-Sherrell¹⁶⁰ presented a written summary statement at the hearing supporting the increased requirement for playable green space than originally proposed but considered several smaller areas would be preferable with better proximity for walking and riding than one or two large reserves¹⁶¹.

3.130 In reply, Mr Phillips highlighted the proposed reserve distribution and sizes (shown in Figure 15 of the Parks and Reserves Servicing Agreement 2021) and confirmed these were provided for in general accordance with the Council’s Engineering Standards for Land Development. He highlighted the larger reserves (Reserves #1 and #6) were positioned to reduce the distances of travel to alternative locations¹⁶².

3.131 Ms Copplestone’s Section 42A Report highlighted Objective 6 and Policy 6.6 regarding vesting the gully network in the Council via the subdivision process. She highlighted that

¹⁵⁶ Section 42A Technical Report of Aaron Philips on Behalf of Palmerston North City Council, Planning, 15 September 2023, para 1

¹⁵⁷ Ibid., paras 23 - 24

¹⁵⁸ Supplementary Statement of Aaron Phillips on behalf of Palmerston North City Council – Parks and Reserves, 11 March 2024, para 6

¹⁵⁹ Ibid., paras 12 - 13

¹⁶⁰ Submission S043

¹⁶¹ Statement of Chris Teo-Sherrell dated 4 November 2023

¹⁶² Statement of Reply Evidence of Aaron Phillips on Behalf of Palmerston North City Council, Parks and Reserves, 28 November 2023, paras 20-23

walkway and recreation infrastructure will be staged over time and that the exact location will be subject to feasibility testing of options¹⁶³.

3.132 In relying on the evidence of Mr Phillips, Ms Copplestone recommended:

- a. Maps 7A,4, 7A.4A, 7A.4B, 7A.4C and 7A.4D(1-17) be inserted to form part of the Structure Plan (which reflects the Council's decision under the Reserves Act process to retain Adderstone Reserve as open space); and
- b. the Suburb Reserve at the southern end of the Plan Change area is increased to an area of approximately 1.16 ha, including an area of approximately 8900m² of flat land sufficient to accommodate an informal playing area of approximately 20m x 30m, including a 10m buffer to the road reserve, as shown on the updated Structure Plan and Zoning maps¹⁶⁴.

Discussion and findings

3.133 We turn our minds to the key question - *Do the Plan Change provisions recommended provide for the creation of a suitable network of reserves in terms of their purpose, extent, location and activities enabled therein that aligns with the nature and density of urban development otherwise facilitated?*

3.134 We find the Plan Change provisions recommended make provision for a variety of open spaces and reserves that reflect the updated minimum standards for reserves in the Council's Engineering Standards for Land Development.

3.135 We consider the Structure Plan demonstrates how this can be achieved, while allowing flexibility to respond to the enabling of medium density housing as an option and future residential development.

3.136 We find the creation of the Conservation and Amenity Zone provides opportunities for new and enhanced recreation use through the future staged development of walkways and connections to existing pedestrian and cycle networks.

Issue 6: Transportation / traffic effects and management

Issue identification

3.137 The Plan Change as notified recognised that there is potential for significant increase in vehicle traffic on the road network and the level of service and safety of road users at some intersections and on some road corridors. The TA Report¹⁶⁵ informed the Plan Change and concluded that the area can be developed in a way that is consistent with the District Plan traffic and transportation related objectives and policies, and with the national and regional strategic direction on land transport.

3.138 The Section 42A Report¹⁶⁶ addressed the large number of submission points relating to potential transportation and traffic effects and summarised these as follows:

¹⁶³ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 282-283

¹⁶⁴ Ibid., page 289

¹⁶⁵ Section 32 Report, July 2022, Appendix 5

¹⁶⁶ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 119-161.

- a. concern that the Plan Change will generate additional traffic volumes on the eastern side of the city that will result in congestion of the road network, efficiency impacts on the strategic freight network, and safety and severance effects on road users, particularly vulnerable users;
- b. requests for various mitigation to address the above safety and efficiency effects, including speed limit reductions, intersection and corridor upgrades and improvements to the State Highway and local road network, walking and cycling infrastructure, and public transport routes servicing the Plan Change area;
- c. concerns about how transport network improvements will be funded and the timing and implementation of these improvements;
- d. the internal roading layout shown on the Structure Plan, including the roading connections to and within the proposed Aokautere Neighbourhood Centre, roading connections with Turitea Valley, the proposed cross gully and gully edge streets and roading cross-sections; and
- e. mode shift and whether the Plan Change sufficiently facilitates uptake of active travel and public transport¹⁶⁷.

3.139 To our minds, the concerns expressed by submitters on this topic can be distilled into an essential question that we need to reach a finding on:

- a. *Will the increase in traffic volumes generated by the development of the area subject to the Plan Change result in adverse effects on the wider transport network that cannot be mitigated through appropriately timed and funded upgrades and improvements to the network and traffic management measures?*

3.140 We note at this point that the extent to which certain roading elements should remain 'fixed' or 'flexible' arose during the course of the hearing. This goes to the overall issue of the balance between prescriptiveness and flexibility in the Plan Change; a matter we address under the heading **Most appropriate Plan Change provisions framework** below.

3.141 We further note here that changes to the proposed internal road layout were the subject of specific submissions from PNIRD that we also address at a later point under the heading **Most appropriate Plan Change provisions framework**.

3.142 The question above is the one we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

Evidence

3.143 The TA Report prepared by Harriet Fraser Traffic Engineering & Transportation Planning identified that existing levels of service are already compromised in places and will be made worse by additional vehicles on the network. It recommended a suite of mitigation measures to address these effects, including road infrastructure improvements to support mode shift towards active and public transport modes, and improvements, particularly to several intersections, to ensure the network is safe for all users.

¹⁶⁷ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 119

- 3.144 Ms Copplestone's Section 42A Report stated that mitigation measures recommended in the TA Report are set out in proposed performance standard (h) in Rule R7A.5.2.2 - Transport Network Requirements for Aokautere Structure Plan, which will apply to subdivision applications for residential development within the Aokautere Greenfield Residential Area; and Table 7A.1: Transportation Network upgrades for the Aokautere Structure Plan Area. She noted that some of these upgrades will be required before any development can occur within the Plan Change area, which is reflected in the performance standard, with subdivision a non-complying activity if identified infrastructure is not to be provided and certified by the Council before development¹⁶⁸.
- 3.145 Ms Copplestone advised that post notification of the Plan Change, the Council commissioned an independent SSA of key intersections and corridors within the existing road network that will be affected by additional traffic associated with PCG. The purpose of this audit was to assist with reviewing the need for, and nature of, the transport mitigation measures identified in the TA Report included with the Plan Change. She noted the SSA corroborated the existing and anticipated safety issues identified in the TA Report, along with some additional safety issues that need to be addressed¹⁶⁹.
- 3.146 In supplementary evidence, Ms Copplestone highlighted the JWS prepared by transportation experts Ms Fraser and Mr Connelly¹⁷⁰. While she agreed there was no certainty about the timing of the planned works to improve existing safety concerns on SH57, based on the evidence of the experts, she considered it was reasonable to assume these would occur within three years¹⁷¹.
- 3.147 Ms Copplestone confirmed she had considered options for delivery of the necessary intersection upgrades in terms of regulatory or non-regulatory options (as proposed by Mr Thomas). In reviewing the additional information provided by Mr Thomas, and having undertaken a s32AA evaluation¹⁷², she concluded a non-regulatory approach would enable development to proceed unfettered in advance of the necessary upgrades, which could result in significant adverse effects on safety and the efficient operation of the network¹⁷³. On this basis she did not recommend any changes to Table 7A.1, except a minor amendment to ensure no discretion is reserved to a third party.
- 3.148 Ms Fraser's Section 42A Report¹⁷⁴ concluded:
- a. There are existing vehicle carrying capacity constraints within the local road network including the Fitzherbert Bridge and the intersection of Fitzherbert Avenue with Te Awe Awe Street. However, there is spare capacity for active mode travel through the network and increased bus use has the potential to reduce private vehicle use;
 - b. There are existing road safety concerns within the local road network, most notably at the Summerhill Drive intersection with Ruapehu Drive and also for pedestrians and cyclists travelling along and across the SH57 Aokautere Drive

¹⁶⁸ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 120

¹⁶⁹ Ibid., page 120

¹⁷⁰ Dated 14 November 2023

¹⁷¹ Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, paras 113 - 114

¹⁷² Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, Annexure 3: Section 32AA Evaluation

¹⁷³ Ibid., paras 116 - 121

¹⁷⁴ Section 42A Report of Harriet Barbara Fraser on Behalf of Palmerston North City Council – Technical - Transportation, 15 September 2023, pages 4 - 6

corridor, which will be exacerbated by additional traffic volumes associated with the Plan Change;

- c. The layout and configuration of the internal roads are guided by the Structure Plan which ensures the delivery of a connected and resilient road network that will appropriately accommodate all road users, including provision for both cyclists and potential bus routes;
- d. The SSA identified that either roundabouts or signals would be able to mitigate the adverse safety effects at the SH57 Aokautere Drive intersections;
- e. A series of linked traffic signals within a reduced speed environment will result in a safe environment for all road users and allow a coordinated approach to managing through traffic flows on SH57 along this short section of urban network;
- f. Both the increase in population facilitated by Plan Change and the intersection upgrades, which will improve the safety and efficiency of turning buses, will increase the viability of more frequent bus services along with new and extended routes;
- g. The existing traffic flows on SH57 Aokautere Drive and the lack of pedestrian and cyclist facilities along and across the corridor result in severance and safety concerns. Mitigation measures have been identified and assessed that will address these concerns for existing and future pedestrians and cyclists in this location; and
- h. There remains some uncertainty regarding the future transport context, particularly with regard to the effect on traffic flows on SH57 Aokautere Drive with the opening of Te Ahu a Turanga and the delivery and timing of the PNITI projects. However, it is expected there will be a reduction in traffic flows on SH57 Aokautere Drive with the opening of Te Ahu a Turanga as a result of reduced travel over the Pahiatua Track. With regard to the PNITI projects, if an additional river crossing is constructed to the west of the Fitzherbert Bridge there will be a significant reduction in demand for travel along both Tennent and Summerhill Drives. Given that the bridge is included in the longer term PNITI programme, neither the TA Report nor Ms Fraser's Section 42A Report assumed that an additional river crossing is in place.

3.149 Ms Fraser's supplementary evidence addressed traffic effects associated with the retirement village and medium density housing development, intersection capacity Level of Service, delivery of early works by NZTA/Waka Kotahi, alternative roading links and specific intersection safety concerns¹⁷⁵. She outlined the current maintenance works and safety improvements being undertaken on SH57 (since the hearing) and the expected speed reduction along this section of SH57 through the NZTA/Waka Kotahi 2024-2027 review period¹⁷⁶.

3.150 Ms Fraser also outlined planned Council works for Turitea Road to address current safety concerns. She considered the additional increases (up to 42 vehicle movements per hour at the busiest times) did not trigger the need for two-laning the bridges or widening of the road; and was not expected to result in a significant change in amenity or safety from existing levels for recreational users of the road¹⁷⁷.

3.151 The statement of evidence from Mr Connelly, a transportation engineer for NZTA/Waka Kotahi, outlined current plans to reduce the speed limit along the Aokautere section of

¹⁷⁵ *Supplementary Statement of Harriet Fraser on behalf of Palmerston North City Council – Transport*, 11 March 2024

¹⁷⁶ *Ibid.*, paras 15 - 16

¹⁷⁷ *Ibid.*, paras 31 - 33

SH57 to better suit the increasingly urban environment; and plans to install connected protected cycleways along the highway and minor improvements for pedestrians in partnership with the Council¹⁷⁸.

- 3.152 Mr Connelly concluded that the initial growth associated with the Plan Change will not necessarily create an immediate significant adverse impact on safety, if the currently planned improvements are made and this would mitigate the risk of serious injury for all road users. He noted the Plan Change will over time create a substantial amount of traffic, and at some stage will require a fundamental change to the control of some the state highway intersections. He accepts that ultimately the installation of traffic signals or a roundabout is likely to be needed for some or all of the affected SH57 intersections.
- 3.153 Mr Connelly advised that consideration of when to upgrade an intersection should be undertaken holistically, balancing the competing demands and considering the needs of all road users. He noted the drivers for, and timing of when, the intersection upgrades would be required is currently unclear, especially when planned changes on the state highway could effectively mitigate some safety concerns¹⁷⁹.
- 3.154 Ms Pilkington, a planner on behalf of PNIRD confirmed the submitter now had a neutral position on the traffic provisions of the Plan Change but urged that the planned upgrades be promptly progressed to address existing concerns¹⁸⁰.
- 3.155 Dr Teo-Sherrell suggested a number of improvements to make the area suitable for pedestrians (including public transport users) and cyclists. He considered shared paths were 'suboptimal facilities' for all users and should be avoided¹⁸¹.
- 3.156 Mr Wilson¹⁸² outlined his experience with the existing traffic safety concerns at a number of intersections affected by the Plan Change when he appeared at the hearing in support of his submission.
- 3.157 Ms Tabitha Prisk¹⁸³ spoke to her submission at the hearing highlighting the current unsafe condition of Turitea Road, particularly from Ngahere Park to Valley View Road, due to the lack of cycle lanes and footpaths, narrow width and the presence of one lane bridges. She considered improvements to the health and safety of users was required before any connector road was built.
- 3.158 Mr Robert Gardner¹⁸⁴ spoke to his submission and showed a PowerPoint presentation at the hearing demonstrating the existing safety concerns at the intersections along SH57, particularly at Cashmere Drive. He considered cycling in these areas was unsafe due to the lack of separation and it appeared Council had put this in the 'too hard' basket.
- 3.159 Mr Paul and Ms Jan Dixon¹⁸⁵ spoke to their submission outlining their concerns regarding existing traffic congestion and safety issues along SH57 and on Turitea Road. They highlighted Turitea Road is used by thousands of walkers each year as part of the Te

¹⁷⁸Statement of Evidence of Glenn Connelly for Waka Kotahi New Zealand Transport Agency Limited – Transport, 27 October 2023, para 2.2

¹⁷⁹ Statement of Evidence of Glenn Connelly for Waka Kotahi New Zealand Transport Agency Limited – Transport, 27 October 2023, para 2.4

¹⁸⁰ Summary of Evidence of Christle Pilkington dated 7 December 2023, page 2

¹⁸¹ Statement of Chris Teo-Sherrell dated 4 November 2023

¹⁸²Submission SO105

¹⁸³ Submission SO84

¹⁸⁴ Submission SO102

¹⁸⁵ Submission SO56

- Araroa Trail and by army personnel on training exercises. For these reasons, they considered Turitea Road should be kept as quiet as possible and no link road should be allowed.
- 3.160 Mr Fugle, on behalf of Woodgate Ltd *et al.* questioned whether there was traffic congestion within Aokautere that necessitated the proposed intersection upgrades and opposed any restrictions on development given the previous pace of development and the potential for this to stifle future development¹⁸⁶.
- 3.161 Mr Thomas, on behalf of Woodgate Ltd *et al.*, considered there should not be a freeze on further development until the intersection upgrades are undertaken. He noted the changes proposed to address this would still require every consent application to provide a traffic assessment to demonstrate it could meet the non-complying threshold test, which would be at a significant cost to applicants even for minor developments. He concluded these works should have been planned and funded previously by Council and there was no justification for any regulatory response¹⁸⁷.
- 3.162 At our invitation, Mr Thomas provided an additional statement of evidence addressing a s32AA evaluation of his suggested non-regulatory method option. He concluded the non-regulatory option was materially more efficient and effective than the proposed Plan Change provisions and that costs and benefits were able to be fairly attributed through the development contributions process¹⁸⁸.
- 3.163 Ms Coats, on behalf of Heritage Estates (2000) Ltd, questioned the gully filling required in the indicative cross sections for the connector roads given the lack of representative topography and the feasibility of the links shown¹⁸⁹.
- 3.164 Mr Waters, on behalf of Ngawai Farms Ltd¹⁹⁰, confirmed his support for the connector roads and links shown on the updated Structure Plan and that there is flexibility regarding the final alignment on their land¹⁹¹.
- 3.165 In reply, Ms Fraser recommended a number of further minor amendments to the provisions to address submitter concerns, including updated indicative road cross sections (to avoid perpendicular parking and to allow for on-road cycle lanes and buffers, through changes to footpaths, cycle lane and road widths)¹⁹². She concluded that when the existing safety concerns associated with the current speed environment and lack of facilities for cyclists and pedestrians to move along and across the SH57 corridor are addressed, some development can occur in advance of the proposed upgrades to accommodate the Plan Change.
- 3.166 Ms Fraser confirmed her recommended thresholds for mitigation are included in Table 7A.1: Transportation Network upgrades for the Aokautere Structure Plan Area based on a specified reduction in Level of Service for each intersection¹⁹³.
- 3.167 In reply evidence, Ms Copplestone highlighted the agreement between the transportation experts that once the immediate safety concerns are addressed, there is capacity in the

¹⁸⁶ *Brief of Evidence of Les Fugle* dated 4 November 2023, paras 54 - 56

¹⁸⁷ *Statement of Evidence of Paul Norman Thomas* dated 27 October 2023, paras 129-139

¹⁸⁸ *Section 32AA Evaluation: Intersection Upgrade Rules Paul Norman Thomas* dated 15th December 2023, para 52

¹⁸⁹ *Statement of Evidence of Amanda M. Coats on behalf of the submitter Heritage Estates (2000) Limited* undated, paras 20 - 25

¹⁹⁰ Submission SO61

¹⁹¹ *Summary Statement of Ngawai Farms Limited (Stu Waters)* dated 7 December 2023

¹⁹² *Statement of Reply Evidence of Harriet Fraser* dated 28 November 2023, pages 20 - 24

¹⁹³ *Ibid.*, page 25

network and that appropriate thresholds have been proposed to signal when that capacity has been taken up¹⁹⁴.

3.168 Ms Copplestone outlined the following key recommended changes to the provision from those set out in her Section 42A Report:

- a. Table 7A.1 has been amended to reflect the traffic capacity thresholds agreed in the JWS – Transportation, as they relate to the state highway network. Table 7A.1 has been split into two tables, the first (Table 7A.1) applies to Summerhill Drive/Ruapehu Drive intersection and the state highway upgrades, and the second table (Table 7A.2) applies to the internal roading network within PCG;
- b. The upgrades previously identified in Table 7A.1 for pedestrian crossings and cycle lanes along Aokautere Drive are recommended to be deleted, on the understanding that the planned early safety works proposed by NZTA/Waka Kotahi will address the existing safety concerns for active users;
- c. The provisions have been updated to be consistent with the amendments to Table 7A.1. The rules enable some development to occur up until the point at which the remaining capacity in the intersections (as they are currently configured) is taken up. At the point at which the capacity thresholds in Table 7A.1 are exceeded, further subdivision development becomes a non-complying activity until the relevant intersection upgrades in Table 7A.1 are operational;
- d. For the internal roading network, the exceedance of the capacity thresholds in Table 7A.2 does not trigger a non-complying activity. The activity status remains restricted discretionary, with an assessment criteria and specific matter of discretion to guide decision making. This approach is consistent with the management of development with respect to the local transport network capacity in other areas of the city (operative provisions);
- e. If one or more of the capacity thresholds in Table 7A.1 are exceeded, the upgrades must be operational ‘before development commences’, as per the notified provisions. This replaces the recommended wording that specified ‘prior to occupation of dwellings’ and will enable some subdivision and residential development to occur in advance of the intersection upgrades);
- f. The provisions have been amended to be consistent across Sections 7A and 7 of the Plan and in relation to retirement villages under R10.7.4.6; and
- g. A number of the proposed policies are recommended to be retained with some minor amendments, to provide a framework to support decision making under the revised approach¹⁹⁵.

3.169 In reply, Ms Copplestone provided a further s32AA evaluation¹⁹⁶ informed by the JWS - Transportation and concluded her revised recommended approach (as outlined above) was a more effective and efficient means of addressing transportation matters and the safety of all road users¹⁹⁷.

¹⁹⁴ *Statement of Reply Evidence of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 28 November 2023, para 26*

¹⁹⁵ *Ibid.*, para 26 (a)-(g)

¹⁹⁶ *Ibid.*, Annexure 4

¹⁹⁷ *Ibid.*, paras 27 - 28

3.170 Ms Copplestone also outlined further agreed amendments with Ms Jenkin (planner for NZTA/Waka Kotahi) to the provisions, informed by the transportation experts, as documented in Ms Fraser's reply evidence¹⁹⁸.

Discussion and findings

3.171 The JWS – Transportation recorded a number of statements and each experts' agreed and disagreed positions, with reasons. It outlined general agreement in all areas, except for modelled flows on SH57, which Mr Connelly considered are largely diagrammatic and lack numeric values.

3.172 The JWS - Transportation and the evidence of NZTA/Waka Kotahi described the early planned works to improve the safety of the SH57 for all road users, which are required to mitigate the existing safety risks on SH57. The transportation experts subsequently agreed that these works will address the short-term safety concerns on the state highway network.

3.173 Mr Connelly provided his assessment on the certainty and timing of those early works in his hearing statement¹⁹⁹; and Ms Fraser provided an update in her supplementary evidence on the anticipated timing of these works²⁰⁰. While they agree that complete certainty cannot be provided, the transportation experts importantly did consider it is a reasonable assumption that these works will take place within the next three years.

3.174 The JWS - Transportation identified that on the assumption the short-term works have been undertaken, at some time in the medium to long term, the level of development in the Plan Change area will result in adverse effects on capacity and safety, triggering the need for additional mitigation.

3.175 Although some uncertainty remains about just how much development could be enabled before the thresholds are triggered, Ms Fraser and Mr Connelly both supported the intersection capacity thresholds identified in the Plan Change provisions as amended through the written reply and the regulatory approach²⁰¹. NZTA/Waka Kotahi's planning expert also supported the approach taken to respond to the need for future upgrades²⁰².

3.176 We now consider the question - *Will the increase in traffic volumes generated by the development of the area subject to the Plan Change result in adverse effects on the wider transport network that cannot be mitigated through appropriately timed and funded upgrades and improvements to the network and traffic management measures?*

3.177 It is clear from the evidence that the existing traffic environment on this section of SH57 requires safety improvements, regardless of any increase in traffic associated with the Plan Change.

3.178 We accept the expert evidence there is a reasonable assumption that the planned works to improve the safety of the SH57 for all road users, which are required to mitigate the existing safety risks on SH57 works, will take place within the next three years.

¹⁹⁸ Ibid., paras 114 - 116

¹⁹⁹ Hearing Statement of Glenn Connelly for Waka Kotahi New Zealand Transport Agency Limited – Transport, 6 December 2023, paras 3.5 - 3.7

²⁰⁰ Supplementary Statement of Harriet Fraser on behalf of Palmerston North City Council – Transport, 11 March 2024, para 16

²⁰¹ Hearing Statement of Glenn Connelly for Waka Kotahi New Zealand Transport Agency Limited – Transport, 6 December 2023, para 2.3-2.4 and Summary of Evidence of Harriet Fraser, 4 December 2023, para 3

²⁰² Hearing Statement of Sarah Jenkin for Waka Kotahi New Zealand Transport Agency Limited – Transport, 6 December 2023, para 1.4

3.179 We find that the plan change appropriately includes provisions and thresholds for requiring upgrades to the network to address any cumulative traffic effects (both safety and efficiency) as a result of the development enabled by the Plan Change.

Issue 7: Reverse sensitivity effects associated with the Rifle Rod and Gun Club

Issue identification

3.180 The Plan Change as notified does not contain any particular provisions relating to noise management. Rather, as signalled in the s32 Report accompanying the Plan Change²⁰³, the Council proposes to rely on the application of the relevant provisions in the operative District Plan as a means to manage noise while broadly ensuring that sensitive areas and uses in the area subject to the Plan Change are not placed in proximity to existing noise generating activities such as farming.

3.181 As summarised in the Section 42A Report²⁰⁴, the relevant provisions in the operative District Plan include the following:

- a. Section 6.2 addresses noise and imposes noise control rules, but in doing so exempts road traffic noise (which is otherwise subject to NZS 6806:2010 Acoustics – Road Traffic Noise – New and Altered Roads);
- b. Section 7: Subdivision and Section 9: Rural Zone objectives and policies that seek to control the adverse effects of noise through the establishment of specific noise limits in the rural area and that seek to avoid reverse sensitivity effects;
- c. Rule R7.15.1.1 which, in regulating subdivision in the Rural Zone, requires residential dwellings to be set back from existing or consented wind turbines;
- d. Rule R7.15.2.1, which makes subdivision in the Rural-Residential Zone Overlay a restricted discretionary activity, subject to matters of discretion including ‘reverse sensitivity effects’ and associated assessment criteria; and
- e. Rule R7.15.4.1.3, which makes subdivision involving non-compliant sized lots a non-complying activity.

3.182 As summarised in Ms Copplestone’s Section 42A Report²⁰⁵, submissions on noise traversed the following matters:

- a. the potential for reverse sensitivity effects arising from the operation of the Manawatū Rifle Rod and Gun Club in proximity to the proposed Rural-Residential Zone, and how they are most effectively managed²⁰⁶;
- b. opposition to the proposal that no residential lots be located south of the ridgeline as a means of mitigating the effects referred to in a. above²⁰⁷;
- c. potential alternative routes onto SH57 to reduce traffic flows and related noise on Pacific Drive otherwise experienced by existing residents²⁰⁸;

²⁰³ s32 Report, paras 61 and 81

²⁰⁴ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 271, 275, 278

²⁰⁵ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 270

²⁰⁶ Rifle Rod and Gun Club Manawatu Inc (S076)

²⁰⁷ Ngawai Farms (S061)

²⁰⁸ Stephen and Carole Sorsby (S010)

- d. potential noise effects of existing wind turbines on future dwellings within the Plan Change area²⁰⁹; and
- e. broader concerns that development in the Plan Change area would lead to an increasingly noise environment²¹⁰.

3.183 As it transpired, the main matter relating to noise that exercised our minds and those of particular submitters during the course of the hearing related to the matters summarised in a. and b. above. The question we have set for ourselves is:

- a. *Do the Plan Change provisions as they now stand provide an effective means to manage reverse sensitivity effects relating to noise?*

3.184 The above question is the one we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

Evidence

3.185 Dealing with the issues summarised in c. to e. above first, it was Ms Copplestone's conclusions, as set out in her Section 42A Report, that:

- a. Although increasing traffic volumes on Pacific Drive are an inevitable result of it serving the Plan Change area, those development expectations in the area are already signalled in the operative District Plan, and therefore no additional measures to address road traffic noise are necessary²¹¹;
- b. Mr Lloyd's confirmation that no potential future properties within the Plan Change area will be adversely affected by wind turbine noise could be relied upon, given the 1.5km exclusion zone imposed by operative District Plan Rule R7.15.1.1 that applies in relation to the Might River windfarm²¹²; and
- c. while noise levels in Aokautere would likely increase over time as the Plan Change area develops, such changes in amenity were countenanced in the NPS-UD and in the residential zoning applied to the area in the operative District Plan²¹³.

3.186 These matters were not further contested during the hearing and we accept Ms Copplestone's conclusions in this respect.

3.187 The evidence of Mr Lloyd, acoustic consultant for the Council, focused on the issue summarised in a. above. He undertook to revisit the evaluation that he had undertaken at the Plan Change preparation stage, with reference to additional noise monitoring and updated modelling to establish the potential for noise from the Gun Club to have an adverse effect on future rural-residential dwellings. This included the application of 55 dB_{LAFmax} and 50 dB_{LAFmax} noise contours²¹⁴.

²⁰⁹ Douglas Pringle (S035)

²¹⁰ Craig Hindle (S082)

²¹¹ *Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning*, 15 September 2023, page 278

²¹² *Ibid.*, pages 278 - 279

²¹³ *Ibid.*, pages 279 - 280

²¹⁴ *Section 42A Technical Report of Nigel Lloyd on behalf of Palmerston North City Council, Technical – Acoustics*, 15 September 2023

- 3.188 Mr Lloyd concluded that potential reverse sensitivity effects from noise generated by the lawfully established Gun Club could not be avoided or adequately mitigated within the predicted 55 dB_{LAFmax} contour and recommended that rural-residential development should not be enabled within it accordingly. He also recommended that specific mitigation measures should be required for new dwellings located within the 50 dB_{LAFmax} contour, given the potential for noise from the Gun Club to disturb outdoor amenity at existing and future dwellings within this area.
- 3.189 With reference to Mr Lloyd's findings, the lawfully established status of the Gun Club, and the operative District Plan policy framework relating to noise management, Ms Copplestone concluded²¹⁵ that:
- a. the Rural-Residential Zone Overlay should be removed from any land lying within the 55 dB_{LAFmax} contour, thereby in part meeting the relief sought by the Gun Club;
 - b. it would not be efficient, effective or appropriate to leave the potential for noise effects from the Gun Club to be assessed at the time of subdivision (as an alternative to not imposing the Rural-Residential Zone Overlay) as requested by Ngawai Farms Ltd;
 - c. future residents within the 50 dB_{LAFmax} contour should be alerted to the presence of the Gun Club via a new policy requiring conditions and consent notices to be placed on subdivision consents and new titles, respectively, in turn requiring new dwellings to be designed and orientated to provide acoustic protection and to record the presence and operation of the Gun Club; and
 - d. updating the Structure Plan to show the relevant area lying within the 55-50 dB_{LAFmax} contour which has not already been subdivided for rural-residential development.
- 3.190 Mr Martin Hunt spoke on behalf of the Gun Club at the hearing, noting the Club's long established presence, its efforts to manage sound levels, its desire for its position to be future-proofed and not disadvantaged by the Plan Change, and its appreciation of the Council's efforts in this regard. In her supplementary statement, Ms Copplestone noted that, subsequent to the hearing, and via an addendum to their evidence, the Gun Club had resiled from its suggestions as to further amendments given the complexity of the provisions from a lay perspective²¹⁶.
- 3.191 We also received evidence on matters relating to Gun Club noise from Ms Pilkington (for PNIRD) and Mr Moefili (for Ngawai Farms Ltd). They expressed concern that the ratcheting back of the Rural-Residential Zone Overlay as proposed by Council officers would have a deleterious effect on the development potential of PNIRD's and Ngawai Farm Ltd's land, respectively²¹⁷.
- 3.192 Consequently, we asked the planning witnesses, including Ms Copplestone to conference on these matters.

²¹⁵ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 275 - 277

²¹⁶ Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, para 150

²¹⁷ Statement of Evidence of Christle Pilkington (Planning) on behalf of Palmerston North Industrial and Residential Developments Ltd (PNIRD), 27 October 2023 and Statement of Evidence of Pepa Moefili on behalf of Ngawai Farms Limited (Stu Waters), 27 October 2023

- 3.193 The resulting JWS set out the agreed position of Ms Copplestone, Ms Pilkington and Mr Moefill²¹⁸. As the planners observed, and we further stress, there was no expert acoustic evidence contrary to the findings of Mr Lloyd in relation to this matter. On this basis, the planners agreed that:
- a. acoustic effects in the area covered by the 55 dB_{LAFmax} contour could be managed via a non-complying activity rule in Section 7 and associated policies to guide decision making; and
 - b. the Rural-Residential Zone Overlay could potentially be reinstated to a greater or lesser extent than the area identified in the operative District Plan, subject to a mapping exercise to be completed by Ms Copplestone.
- 3.194 In her statement of reply,²¹⁹ Ms Copplestone proposed wording for the new non-complying subdivision rule based on modifications to the version originally proffered by Ms Pilkington. This included a provision for the Gun Club to be given limited notification of applications made under the rule. Ms Copplestone further recommended the insertion of a new 'avoidance' policy with respect to noise sensitive activities seeking to locate within the 55dB_{LAFmax} contour area. She also proposed modifications to the new policy she had previously recommended to manage effects on activities within the 55-50 dB_{LAFmax} contour, to provide additional decision making guidance.
- 3.195 Finally, and in response to a query from us at the hearing, Ms Copplestone indicated her lack of support for Ms Pilkington's suggestion that a new rule be inserted in the Rural Zone making dwellings a non-complying activity, as it was at the point of subdivision that reverse sensitivity effects are to be properly assessed.
- 3.196 Ms Copplestone shed additional light on this matter in her supplementary statement²²⁰. She indicated that across vacant lots owned by the two submitters within the Plan Change area, only two or three dwellings not enabled by a subdivision consent would be captured by a land use rule and therefore its imposition would not be proportionate, having revisited the matter in consultation with Mr Lloyd. Mr Lloyd, through Ms Copplestone, was able to further advise us that there was no appropriate NZS or standardised methodology for measuring and assessment of gun club noise.
- 3.197 Having reviewed the Gun Club's addendum and discussed a number of options with them, Ms Copplestone recommended some additional, relatively minor changes to the provisions, as latterly proposed to improve their utility.

Discussion and findings

- 3.198 We now turn our minds to the key question - *Do the Plan Change provisions as they now stand provide an effective means to manage reverse sensitivity effects relating to noise?*
- 3.199 We find the Plan Change provisions as now recommended by Council officers have evolved from the notified version to the currently proposed version so as to provide a clear, directive, effective and efficient framework to guide decision-making in relation to noise and, more specifically, reverse sensitivity effects arising from the development of

²¹⁸ Joint Witness Statement of Planning Experts, 15 and 16 November 2023, Topic 7: Gun Club noise

²¹⁹ Statement of Reply Evidence of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 28 November 2023, paras 10 – 20, 45 - 46

²²⁰ Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, paras 145 -152

the Plan Change land. We further find that the proposed approach, as it now stands, is more proportionate than a blanket 'uplift' of the Rural-Residential Zone Overlay as previously proposed.

- 3.200 We thank Ms Coplestone for her sustained efforts on this topic and also acknowledge Mr Hunt's helpful statement and input in this respect, which has had a material impact on the recommended provisions that we determine to be appropriate.

Issue 8: Effects contributing to climate change

Issue identification

- 3.201 A number of submitters to the Plan Change were concerned that it is inconsistent with national and local commitments to reduce greenhouse gas emissions. As summarised in Ms Coplestone's Section 42A Report²²¹, these submissions traverse the following:

- a. that the 'isolated' nature of the Plan Change area would exacerbate levels of car dependency and increase greenhouse gas emissions;
- b. that the low density nature of the development would compromise the success of active and public transport modes;
- c. that the Plan Change is inconsistent with national direction on urban intensification (NPS-UD) and emission reductions (National Emissions Reduction Plan); and
- d. that the Plan Change is inconsistent with the Council's own commitments to reduce emissions (PNCC Climate Change Adaptation Plan)²²².

- 3.202 To our minds the concerns expressed by submitters on this topic can be distilled into an essential question that we need to reach a finding on:

- a. *will the nature of development that is enabled by the Plan Change contribute to low intensity development, private vehicle use and dependency, and vehicle emissions to an extent inconsistent with national direction on urban intensification and greenhouse gas emission reduction and the Council's own commitment to reduce emissions?*

- 3.203 This is the question that we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

Evidence

- 3.204 Ms Coplestone did not recommend any changes to the Plan Change in response to the submissions summarised above. Her reasons are extensively canvassed and can be broadly summarised as follows:

- a. the Council has obligations under the NPS-UD to address a short-term shortfall in housing needs, and PCG forms part of the response;

²²¹ Section 42A Report of Anita Renie Coplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 69

²²² Including Robert McLachlan (SO18), Patrick Morgan (SO20), Ralph Sims (SO31), Barry Scott (SO54), Kat Lyons (SO62), Kevin Low (SO73), Anna Berka (SO95), Horizons Regional Council (SO60).

- b. the Council is also working on introducing a medium density residential zone and preparing a Future Development Strategy, as means of having regard to the National Emission Reduction Plan and Climate Change Adaptation Plan;
- c. the existing land use constraints in the Plan Change area constrain the extent to which high density housing can be provided for;
- d. the partial development of Aokautere to date provides an opportunity for further consolidation, diversity in housing typologies and efficient use of infrastructure through the Plan Change;
- e. Horizons Regional Council has indicated an intention to extend commuter bus services into the Plan Change area and this will be facilitated by changes to roading typology recommended by Ms Fraser and incorporated into the amended Plan Change provisions;
- f. the Structure Plan provides for an extensive walkway and cycleway network to support active modes;
- g. these types of measures will contribute to relative reductions in vehicle kilometres travelled and greenhouse gas emissions;
- h. to the extent that they are able, the Plan Change provisions seek to mitigate natural hazard risks (including those exacerbated by climate change) by, for example, adopting water sensitive design requirements and avoiding provision for development in areas subject to flooding, erosion and the like; and
- i. the Structure Plan provisions ensure appropriate access to sunlight, solar energy and therefore energy efficiencies in building design, as attested to by Mr Burns in his evidence²²³.

3.205 Professor Ralph Sims, while unable to attend the hearing, tabled a short statement in support of his original submission²²⁴. He expressed his view that the Plan Change proposal was not supported by an assessment of the levels of greenhouse gas emissions generated by it and that it needed to be reviewed to fully take account of the critical and urgent imperative to minimise such emissions, given global and local evidence of a rapidly warming climate. Dr Teo-Sherrill also presented at the hearing along similar lines.

3.206 In response, Ms Copplestone acknowledged that while greenhouse gas emissions arising from the Plan Change had not been explicitly quantified, given the inherent difficulties in doing so, in her opinion, the dimensions of urban form that drive energy use and greenhouse gas emissions, had been considered by the Council's urban designers and had influenced the layout of the Structure Plan, as follows:

*"This includes adopting as far as possible, a compact and walkable urban form, high street density, small block size and co-location of housing with employment and shopping opportunities within the neighbourhood centre. The design team has been cognisant that urban form influences energy use, buildings, transport, land use, and individual's behaviours. The cross-sections and street layout are intended to facilitate and encourage modal shift to public transport and active modes, as are the safety improvements identified for the state highway network."*²²⁵

²²³ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 69 - 77

²²⁴ Submission S031

²²⁵ Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, para 106

Discussion and findings

- 3.207 Overall, we concur with the position of the Council, as expressed in its closing legal submissions, that a *“planning proposal is never developed on a truly ‘clean slate’”*²²⁶. The existing environment at Aokautere already includes a significant amount of housing and the operative District Plan, absent the Plan Change, provides for further development of a relatively low density nature.
- 3.208 To a large extent, we accept the Plan Change is a transitional mechanism; it seeks to address a shortfall in housing provision, as the Council is obliged to do, while ensuring that the provisions cater for development of a denser nature than otherwise provided for in the operative District Plan, supported by and supportive of active and public transport modes, and commensurate with the existing constraints of the land. It is evident that the Plan Change provides more than just a low density commuter dormitory in the style of twentieth-century development.
- 3.209 We agree with the Council that:
- “PCG will “arrest and redirect” the development to limit further growth in emissions, and will assist in, for example, creating opportunities for public and other modes of transportation, enabling the local business area so that residents are less dependent on the centre city, and by creating more amenity features nearby and within walking distance.”*²²⁷
- 3.210 On that basis, we find that the Plan Change will not contribute to low intensity development, private vehicle use and dependency, and vehicle emissions to an extent inconsistent with national direction on urban intensification and greenhouse gas emission reduction and the Council’s own commitment to reduce emissions.

Issue 9: Provision for a neighbourhood centre via the Local Business Zone*Issue identification*

- 3.211 As summarised in Ms Copplesstone’s Section 42A Report²²⁸:
- a. the Plan Change provides for a neighbourhood centre, zoned Local Business Zone, centrally positioned in the Aokautere Structure Plan with part frontage to Pacific Drive;
 - b. the purpose of the neighbourhood centre is to provide a focus for the provision of goods, services, amenities and opportunities for social interaction;
 - c. the centre is intended to be readily accessible to a range of transport modes via a network of roads, cycleways and footpaths;
 - d. its central location is determined by existing development patterns and constraints, and the need to support its viability by ensuring it is surrounded by housing; and
 - e. the Structure Plan includes a Precinct Plan for the centre (Map 7A.4C), which identifies the desired centre layout, activities, roading and parking outcomes

²²⁶ Closing Submissions on behalf of Palmerston North City Council, 11 March 2024, para 93

²²⁷ Closing Submissions on behalf of Palmerston North City Council, 11 March 2024, para 94

²²⁸ Section 42A Report of Anita Renie Copplesstone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 209

supported by new policies, rules and performance standards contained within Sections 7A and 11.

3.212 As further summarised in the Section 42A Report²²⁹, the Plan Change provisions providing for the neighbourhood centre attracted submissions on the following matters:

- a. support for development of the neighbourhood centre to provide access to local shops and amenities²³⁰;
- b. opposition to the prescriptive nature of the Precinct Plan, policies and design controls set out in the proposed provisions²³¹;
- c. concern over the assumption that the centre's viability is dictated by the presence of medium density housing, when the reverse is true (i.e., that the centre needs to be developed early to support the development of medium density housing)²³²;
- d. requests that the neighbourhood centre be relocated so that it is all on Pacific Drive²³³, or on one side of the road²³⁴;
- e. requests for greater flexibility to accommodate light commercial activities at other locations within the Plan Change area or for the provision of an additional village centre, to increase overall accessibility by biking or walking²³⁵;
- f. requests to turn the neighbourhood centre into a village square, without any motorised traffic or parking²³⁶; and
- g. opposition to the proposed controls which make residential activities on the ground floor within the neighbourhood centre a non-complying activity²³⁷.

3.213 As the Council observed in its opening legal submissions²³⁸, questions over the viability of the neighbourhood centre, in particular its reliance on the presence and support of medium density housing, and over the extent to which the relevant provisions should be directive or enabling, remained key matters of disagreement following the filing of the Section 42A Reports.

3.214 To our minds the concerns expressed by submitters on this topic can be distilled into two essential questions that we need to reach finding on:

- a. *is there a well-established case for a single neighbourhood centre serving the Structure Plan area accounting for its feasibility and viability, such that its provision should represent a mandatory requirement?*
- b. *assuming there is such a case, are the proposed Local Business Zone Precinct Plan provisions that provide for a neighbourhood centre appropriately framed?*

3.215 The first question above does go to an issue over the form and nature of Plan Change provisions relating to medium density housing, and both questions address the balance

²²⁹ Ibid.

²³⁰ Ben Somerton (S083), Karen Wilton S09, Dennis Thomas S022

²³¹ Heritage Estates 2000 Ltd (S051), Woodgate Ltd *et al* (S058)

²³² Woodgate Ltd *et al* (S058)

²³³ Woodgate Ltd *et al* (S058)

²³⁴ Paul Hewitt (S0101)

²³⁵ Chris Teo-Sherrell (S043), Kevin Low (S073)

²³⁶ Chris Teo-Sherrell (S043)

²³⁷ Heritage Estates 2000 Ltd (S051), Woodgate Ltd *et al* (S058)

²³⁸ *Opening Legal Submissions on behalf of Palmerston North City Council*, 4 December 2023, para 33

between prescriptiveness and flexibility in the Plan Change. These are matters we address under the heading **Most appropriate Plan Change provisions framework** below.

3.216 The questions above are those we turn our minds to in our *Discussion and findings* section below. Before doing so, however, we summarise the evidence on this topic that was presented to us at the hearing.

Evidence

3.217 In responding to the points raised in submissions above in her Section 42A Report, and particularly where they concern the viability, size and location of the neighbourhood centre, and the balance between prescription and flexibility associated with the relevant PCG provisions, Ms Copplestone relied to some extent on the evidence of Mr Murphy, Mr Cullen and Mr Burns on strategic planning, urban economics and urban design respectively²³⁹.

3.218 On this basis, Ms Copplestone reached a detailed series of conclusions (and recommendations)²⁴⁰ that we summarise at a high level here:

- a. the economic analysis concludes that the Plan Change area would support only one neighbourhood centre, within the context of some commercial activities, such as home occupations being appropriately provided for in the residential environment;
- b. a 'car-free' centre would not be viable and while a 'presence' along Pacific Drive is important an 'off-line' centre layout is necessary to the creation of a high-quality public realm;
- c. some degree of prescriptiveness in the relevant Plan Change provisions is necessary to achieve a 'well-functioning urban environment' and avoid piecemeal development, consistent with the operative District Plan policy framework for the Local Business Zone;
- d. relatively minor amendments to the Local Business Zone objectives and policies are warranted to improve their clarity and workability, and remove repetition;
- e. an acknowledgement that there is a symbiotic relationship between the neighbourhood centre and medium density housing but that it is not feasible to require one to be developed before the other;
- f. a restriction on ground floor residences in the neighbourhood centre is a necessary and operative District Plan tested means of ensuring primary sites are available for commercial needs and the relative amenities of the centre, and (above ground floor) apartments are appropriately served;
- g. minor amendments to the relevant standards are warranted to improve their workability with respect to the provision for residential activity in the centre;
- h. performance standards relating to signage in the neighbourhood centre are a necessary means of creating the high amenity environment envisaged under the policy framework, but some amendments to improve their clarity and application are warranted;

²³⁹ Section 42A Technical Report of David Murphy on behalf of Palmerston North City Council, Technical – Strategic Planning, 15 September 2023, Section 42A Technical Report of Michael Cullen on behalf of Palmerston North City Council, Technical – Urban Economics, 15 September 2023 and Section 42A Technical Report of Andrew D. Burns on behalf of Palmerston North City Council, Technical – Urban Design, 15 September 2023

²⁴⁰ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 210 - 236

- i. other proposed standards relating to the density of residential activities, building heights in the centre, building frontages, verandahs, and shop fronts and glazing would potentially frustrate its viability and/or amenity or are unclear or inconsistent and should be deleted or amended;
- j. the list of 'key outcomes' for the neighbourhood centre set out in the Precinct Plan that would drive a non-complying activity status for buildings where they are not met are subjective and superfluous in the context of the existing policy framework and should be deleted; and
- k. other amendments to Precinct Plan provisions including performance standards and assessment criteria are warranted.

3.219 During the course of the hearing, we heard from Mr Fugle (for Woodgate Ltd *et al.*) who contended that the business case for a commercial hub in the Plan Change area was 'flawed'²⁴¹. Mr Thomas (also for Woodgate Ltd *et al.*) queried the evidence base for Mr Cullen's view that the neighbourhood centre is critical to generating the demand for more intensive housing and that a commitment to a future centre is sufficient to stimulate the required housing demand²⁴². Mr Thomas sought a Structure Plan that provides greater flexibility as to the location of any centre and leaves detailed design to future consenting processes or, alternatively, that a site for a neighbourhood centre at the South Village should be considered.

3.220 With respect to Mr Fugle's assertion, Ms Copplestone remained of the view, as outlined in her statement of reply, that the reasons for the provision and positioning of the neighbourhood centre and its role in catalysing higher density living remain valid and continue to be supported by the evidence of Mr Cullen and Mr Burns²⁴³.

3.221 In response to Mr Thomas's queries, Mr Cullen drew on his experience as an urban economist in stating that the 'promise' of a centre is often enough for a developer to build housing density and diversity around the centre site; and that Aokautere growth would be the dominant factor in the timing of the centre given the surrounding catchment was of a sufficient size to generate the centre at or around the scale proposed, whereas a centre at South Village would likely fail²⁴⁴.

3.222 Mr Burns responded to Mr Thomas's suggestion that medium density housing should be located within 'easy' walking distance of a neighbourhood centre by confirming that a 400m 'ped-shed' had been applied in delineating both the centre and the surrounding medium density housing areas identified in the Structure Plan²⁴⁵.

3.223 In her supplementary statement²⁴⁶, Ms Copplestone indicated that she held to the view that:

- a. the application of a Local Business Zone is required to enable and manage the development of the neighbourhood centre; and

²⁴¹ *Brief of Evidence of Les Fugle*, 4 November 2023, paras 47-51

²⁴² *Statement of Evidence of Paul Norman Thomas*, 27 October 2023, paras 91-101

²⁴³ *Statement of Reply Evidence of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning*, 28 November 2023, paras 90 and 105

²⁴⁴ *Statement of Reply Evidence of Michael Cullen on behalf of Palmerston North City Council, Urban Economics*, 28 November 2023, paras 30 – 31, 35-36

²⁴⁵ *Statement of Reply Evidence of Andrew Burns on behalf of Palmerston North City Council, Urban Design*, 28 November 2023, para 89

²⁴⁶ *Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning*, 11 March 2024, para 140

- b. it is important to retain the Precinct Plan to provide direction on block layout, orientation/configuration of commercial frontages, access and internal movements, and the relationship/connectivity with surrounding areas.

3.224 Having said that, Ms Copplestone did draw our attention to the manner in which those provisions had by that stage been pared back to distinguish between features crucial to its delivery and those where a greater degree of flexibility could be provided for and managed with reference to the relevant policy framework. These have been summarised earlier (refer paragraph 3.218 above) but we note, additionally, that she also recommended a change in consent status from non-complying to discretionary, where the relevant performance standards are not complied with²⁴⁷.

3.225 With respect to the above amendments, we note that Mr Burns indicated his satisfaction that the simplified Precinct Plan and proposed policy framework still provided sufficient direction to ensure that the neighbourhood centre would be developed in a manner consistent with current urban design best practice²⁴⁸.

Discussion and findings

3.226 On the first question that we have posed, we find that there *is a well-established case for a single neighbourhood centre serving the Structure Plan area accounting for its feasibility and viability, such that its provision should represent a mandatory requirement*, in the sense that the nature of that 'mandatory requirement' is that a Local Business Zone with attendant activity rules and other provisions should be applied to the area in question. We note that Mr Cullen's evidence was not challenged in any equivalent technical sense.

3.227 We agree with Mr Cullen and Ms Copplestone and certain submitters that there is something of a 'chicken and egg' situation here when it comes to the relationship between the neighbourhood centre and medium density housing. However, quite rightly, the Plan Change provisions do not attempt to dictate which element should occur first; this is appropriately a matter for the market. In reality, we consider it does not matter, so long as planning provision for both is made. We note that, as signalled previously, we turn our minds to the appropriate form of provision for medium density housing under the heading **Most appropriate Plan Change provisions framework** below.

3.228 Now that we have settled the matter of viability to our satisfaction, we can turn our minds the second question - *are the proposed Local Business Zone Precinct Plan provisions that provide for a neighbourhood centre appropriately framed?* In this respect, our first observation is that, as with other topics, the provisions relating to the neighbourhood centre as recommended by Council officers have evolved during the course of hearing in response to submissions and evidence from other parties.

3.229 We welcome that process as a basis for ensuring provisions as they now stand, are fit-for-purpose, appropriate, and remain suitably aligned with broader policy framework. In that regard, we note that Mr Cullen has reviewed the Precinct Plan and has indicated his comfort with the reduced level of prescription that it now provides. We further note that no other urban design expertise was fielded by submitters and that we are entitled to rely on Mr Burns's perspective in that respect.

²⁴⁷ Ibid., paras 140 - 142

²⁴⁸ *Supplementary Statement of Andrew Burns on behalf of Palmerston North City Council, Urban Design*, 11 March 2024, paras 9 - 10

3.230 In finding that the Local Business Zone Precinct Plan provisions providing for a neighbourhood centre as now proposed are appropriately framed, we quote with favour from Ms Copplestone's supplementary statement:

*"This [proposed] approach reduces the level of prescription within the Precinct Plan and provides greater flexibility for developers, while still ensuring that the key components for a successful LBZ [Local Business Zone] are delivered. It remains the position of the Council experts that a level of prescription is necessary to ensure that the LBZ is delivered in a way that encourages the majority of visits to the centre to be by foot or cycle, provides a high level of connectivity with the surrounding residential streets and facilitates the development of medium density housing within the immediate village area."*²⁴⁹

3.231 We find that an appropriate balance between prescriptiveness and flexibility has been achieved in relation to the proposed approach. As noted previously, this is a matter we return to more broadly under the **Most appropriate Plan Change provisions framework** below. We adopt the amendments latterly proposed by Ms Copplestone together with her s32AA evaluation accordingly²⁵⁰.

Issue 10: Provision for retirement villages

Issue identification

3.232 As summarised in Ms Copplestone's Section 42A Report²⁵¹ the Plan Change:

- a. provides an option for an area of the Medium Density Village to be developed for a retirement village (Map 7A.4);
- b. proposes amendments to operative Rule R10.7.4 which provides for a number of 'non-residential' activities in the Residential Zone, including retirement villages as discretionary activities, and the inclusion of a new Rule R10.7.5.3, that would make any new retirement village in the Aokautere Greenfield Residential Area, which is not located and developed in accordance with the Aokautere Structure Plan, a non-complying activity; and
- c. will insert new assessment criteria applying to retirement villages.

3.233 These proposed elements of the Plan Change drew a level of support from submitters, but also, as summarised in the Section 42A Report²⁵², some concerns and requests regarding:

- a. the potentially uninspiring design elements associated with retirement villages²⁵³;
- b. the inflexibility associated with a non-complying activity status being accorded to 'out of location' retirement villages²⁵⁴;
- c. the uncertain extent of application of design criteria beyond the Aokautere Greenfield Residential Area²⁵⁵;

²⁴⁹ *Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning*, 11 March 2024, para 143

²⁵⁰ *Ibid.*, Annexure 3: Section 32AA Evaluation

²⁵¹ *Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning*, 15 September 2023, page 185

²⁵² *Ibid.*, pages 185 - 191

²⁵³ Scott Knowles (SO64)

²⁵⁴ Woodgate Ltd *et al* (SO58), Heritage Estates 2000 Ltd (SO51)

²⁵⁵ Flyers Investment Group (SO103), Avida Group (SO104), Heritage Estates 2000 Ltd (SO51)

- d. the necessity for certain design related assessment criteria²⁵⁶ and prerequisite transport requirements²⁵⁷; and
- e. the requested extension of the site identified for the retirement village to the southeast²⁵⁸.

3.234 While some sort of provision for retirement villages in the Plan Change area appears to be broadly supported, the issues raised in submissions go to an overall question as to the *appropriate level of specificity where these provisions are concerned*. As with other topics, beyond provision for retirement villages, this question goes to the balance between prescriptiveness and flexibility in the Plan Change, which is a matter we more broadly address under the heading **Most appropriate Plan Change provisions framework** below.

Evidence

3.235 In responding to the concerns raised and requests made in submissions above in her Section 42A Report, Ms Coplestone relied to some extent on the evidence of Mr Burns and Ms Fraser on urban design and transportation, respectively²⁵⁹.

3.236 On that basis, Ms Coplestone recommended a series of changes to the Plan Change provisions to:

- a. make a retirement village in the Plan Change area a discretionary activity as a sufficient basis for assessment (through further amendment to operative Rule R10.7.4 and the deletion of proposed Rule R10.7.5.3);
- b. make it clear the assessment criteria apply only within the Aokautere Greenfield Residential Area;
- c. remove overlap and duplication in the assessment criteria;
- d. clarify the circumstances in which performance standards relating to the staging of transport infrastructure upgrades apply;
- e. alter the extent of the area identified for retirement village purposes; and
- f. make other minor amendments²⁶⁰.

3.237 Prompted by evidence presented by Mr Fugle and Mr Thomas at the hearing²⁶¹, we asked Ms Coplestone to consider whether a restricted discretionary activity status would be a more effective and efficient activity status for any proposed retirement village in the Plan Change area.

3.238 Ms Coplestone responded that:

²⁵⁶ Woodgate Ltd *et al* (S058), Flyers Investment Group (S0103) and Avida Group (S0104)

²⁵⁷ Woodgate Ltd *et al* (S058)

²⁵⁸ Woodgate Ltd *et al* (S058)

²⁵⁹ Section 42A Technical Report of Andrew D. Burns on behalf of Palmerston North City Council, Technical – Urban Design, 15 September 2023 and Section 42A Technical Report of Harriet Barbara Fraser on behalf of Palmerston North City Council, Technical – Transportation, 15 September 2023

²⁶⁰ Section 42A Report of Anita Renie Coplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 186 - 191

²⁶¹ Brief of Evidence of Les Fugle dated 4 November 2023, Statement of Evidence of Paul Norman Thomas, 27 October 2023, paras 105 - 109

- a. the operative District Plan status for retirement villages in the Residential Zone is discretionary, which squared with her recommended amendment for PCG as summarised above;
- b. discretionary activity status is appropriate at Aokautere given the potential wide range of activities that may be associated with a comprehensive village development and associated building scale, noise and traffic effects, and the risks of such a development being poorly integrated with the rest of the village and neighbourhood centre;
- c. the need for the retirement village to support the viability of the adjacent neighbourhood centre through the provision of public street connections and other means of boundary treatment (as Mr Burns had alluded to in his own evidence²⁶²); and
- d. that on this basis a lesser activity status affording a more limited degree of control would be inappropriate²⁶³.

3.239 We also sought Ms Fraser's perspective on the traffic effects of retirement villages, in a specific situation where a land use consent was sought in advance of a subdivision consent. Ms Fraser presented evidence that illustrated the relatively low traffic volumes generated by retirement villages, comparative to standard residential developments; and concluded that, on this basis, a land use application for a retirement village may not require a transport infrastructure upgrade assessment. She further noted that the assessment criteria were now drafted by Ms Coplestone in such a way that such an assessment could be requested at the land use application stage, should the scale of the proposed village warrant it²⁶⁴.

Discussion and findings

3.240 Succinctly, we find a discretionary activity status to be commensurate with that applying in residential environments elsewhere in the operative District Plan.

3.241 We also find that such activity status is appropriate given the relevant assessment criteria and other provisions catering for and applying to a retirement village in the Plan Change area as they now stand, having been amended by Council officers in the lead up and during the course of the hearing.

Issue 11: Other matters

Issue identification

3.242 For completeness, we note the Plan Change also drew submissions on a range of other matters. At a broad level, and as summarised in Ms Coplestone's Section 42A Report, these submissions related to:

- a. general submissions and submissions relating to the Plan Change as a whole²⁶⁵;

²⁶² Statement of Reply Evidence of Andrew Burns on behalf of Palmerston North City Council – Urban Design, 28 November 2023, para 82

²⁶³ Supplementary Statement of Anita Renie Coplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, paras 153 - 157

²⁶⁴ Supplementary Statement of Harriet Fraser on behalf of Palmerston North City Council – Transport, 11 March 2024, paras 7 - 11

²⁶⁵ Addressed under 'Topic 18' in Ms Coplestone's Section 42A Report, pages 317 - 325

- b. cultural values and matters²⁶⁶;
- c. provision for community facilities²⁶⁷ (other than recreation, parks and reserves – refer **Issue 5** above);
- d. matters of community well-being and safety²⁶⁸; and
- e. provision for infrastructure and services²⁶⁹ (other than transportation – refer **Issue 6** above).

3.243 Beyond the generality of significant recommended amendments that Ms Copplestone was of the opinion went a considerable way in addressing the points and requests made in submissions above and that we have addressed in previous sections, she recommended a limited number of specific amendments to the Plan Change provisions in response to the above submissions, that we summarise as follows:

- a. amendment to the definition for ‘developable land’;
- b. insertion of new definitions for ‘AEP’ and ‘gully network’;
- c. amendments to the key for the Structure Plan;
- d. amending Policy 1.6 in Section 15.1 to better reflect the intention of the gullies to be developed as recreational assets, where possible;
- e. amending Policy 5.4 in Section 7A to provide greater flexibility in how development in the Plan Change area responds to design outcomes and guiding principles;
- f. amending the Aokautere Structure Plan and Aokautere Masterplan to reference the location of the National Grid Yard and Bunnythorpe-Wilton Transmission Line, respectively; and
- g. deleting Policy 1.5 in Section 10 and performance standard R10.6.1.1(j).

Discussion and findings

3.244 We do not propose to delve further into these submissions but note that the matters they raise (together with the limited amendments Ms Copplestone proposed in response) were broadly uncontested during the course of the hearing.

3.245 We accept and adopt Ms Copplestone’s recommended amendments and her s32AA evaluation on that basis²⁷⁰.

²⁶⁶ Addressed under ‘Topic 10’ in Ms Copplestone’s Section 42A Report, pages 255 - 262

²⁶⁷ Addressed under ‘Topic 14’ in Ms Copplestone’s Section 42A Report, pages 290 - 291

²⁶⁸ Addressed under ‘Topic 15’ in Ms Copplestone’s Section 42A Report, pages 292 - 294

²⁶⁹ Addressed under ‘Topic 16’ in Ms Copplestone’s Section 42A Report, pages 295 -305

²⁷⁰ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, Section 5, pages 326 - 360

Overall evaluation

3.246 At this point, we have concluded our evaluation of specific topics or issues and are in a position to undertake our overall evaluation of the Plan Change, with reference to the stepwise approach described at the start of this section. To remind the reader, this sees us:

- a. first testing whether the rationale for PCG as now proposed is sound;
- b. assuming that that it is, then determining whether the proposed zoning pattern is appropriate; and
- c. assuming that it is, thirdly considering whether the planning framework or specific PCG provisions are appropriate.

3.247 We address these matters under the headings **Rationale for rezoning, Appropriateness of rezoning** and **Most appropriate Plan Change provisions framework** below, drawing where necessary on the findings we have first reached in relation to specific topics or issues under the heading **Specific matters requiring our evaluation** above.

Rationale for rezoning

3.248 In the first instance, we need to consider whether the rationale for the Plan Change, as now proposed, is sound.

3.249 The fundamental issue that PCG seeks to address was succinctly expressed in the Council's opening legal submissions²⁷¹ as follows:

Palmerston North has a high level of demand for housing over the short term, influenced by past years of undersupply ... While some areas of the City will be further intensified, further greenfield land development is also necessary to ensure Council's housing bottom lines for the purpose of the National Policy Statement on Urban Development (NPS-UD) are met.

3.250 At this point it may be helpful to note that in the context of the NPS-UD, 'short term' means three years, 'medium term' three to 10 years, and 'long term' 10 to 30 years²⁷².

3.251 It is clear from the evidence of Mr Murphy for the Council that these issues of housing supply remain²⁷³. In response, Council has identified three major growth locations; one of which is Aokautere. As Mr Murphy attested, the Plan Change provides an opportunity to provide for that identified growth need while also addressing environmental issues that have arisen as a result of the somewhat *ad hoc* approach to ongoing development at Aokautere to date.

3.252 Further, Mr Cullen's evidence on behalf of the Council²⁷⁴ made it clear to us that development facilitated by the Plan Change will provide a relatively constant source of housing supply over time and addresses the need for greater housing diversity resulting from significant demographic changes. To quote Mr Cullen:

²⁷¹ *Opening Submissions on behalf of Palmerston North City Council*, 4 December 2023, para 9

²⁷² NPS-UD 2020, Part 1: Preliminary provisions, 1.4 Interpretation

²⁷³ *Section 42A Technical Report of David Murphy on behalf of Palmerston North City Council, Technical – Strategic Planning*, 15 September 2023

²⁷⁴ *Section 42A Technical Report of Michael Cullen on behalf of Palmerston North City Council, Technical – Urban Economics*, 15 September 2023

*“PCG responds to a citywide shortage in housing supply by expanding development opportunities and intensifying resources within the urban area. In particular, PCG will enable the delivery of a range of dwellings, including on smaller sites, with provision for medium-density housing options. In doing so, PCG better responds to the range of potential market demand reflected in the city’s demographics”.*²⁷⁵

- 3.253 In response to submissions supportive of the intent of the Plan Change to provide additional housing at Aokautere, and with reference to the evidence of Mr Murphy and Mr Cullen, Ms Copplestone acknowledged it does not provide for immediate release of housing supply and that, subject to necessary infrastructure works being undertaken first, the land is likely to be developable within a medium to long term timeframe²⁷⁶.
- 3.254 This suggested to us that there remained an element of doubt, even among Council officers, as to the timing of the Plan Change’s contribution to housing supply issues *i.e., if the most pressing need was an immediate shortfall in housing supply, then how would this be addressed by a Plan Change that would only release developable land over a medium or long-term timeframe?*
- 3.255 Matters of timing were discussed by the planning witnesses following direction from us, as reported in the subsequent JWS²⁷⁷. It was evident that the witnesses remained in disagreement about the extent to which (if at all) the Plan Change responded to a lack of short-term supply or even whether it demonstrated that sufficient development capacity would be realised over the medium term. Mr Thomas, for instance, remained unconvinced that Council had fielded sufficient evidence that the proposal was ‘feasible and reasonably expected to be realised’ in accordance with Section 3.2(2)(c) of the NPS-UD²⁷⁸.
- 3.256 Ms Copplestone sought to address this matter further in her reply statement²⁷⁹. There, she:
- a. noted that the latest Palmerston North Housing and Business Capacity Assessment 2023 demonstrated that development in Aokautere in the short term, for 300 dwellings, and in the long term for 700 dwellings, is commercially feasible and expected to be realised;
 - b. clarified that PCG sought to provide plan-enabled capacity to assist in meeting the anticipated demand for additional housing over the medium to long term;
 - c. acknowledged that predicting development feasibility, particularly over medium and long-term periods is challenging;
 - d. noted that the Palmerston North Housing and Business Capacity Assessment 2023, together with the evidence of Mr Murphy²⁸⁰ and Ms Allen (and Mr Nicoll) on development feasibility²⁸¹, demonstrated that the NPS-UD test referred to above would be met; and

²⁷⁵ Ibid, para 1(e)

²⁷⁶ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 164 - 165

²⁷⁷ Joint Witness Statement of Planning Experts, 15 and 16 November 2023, under ‘Topic 3: Housing Delivery’

²⁷⁸ Ibid

²⁷⁹ Statement of Reply Evidence of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 28 November 2023, paras 57 - 61

²⁸⁰ Statement of Reply Evidence of David Murphy on Behalf of Palmerston North City Council, Strategic Planning, 28 November 2023, paras 7 - 13

²⁸¹ Statement of Reply Evidence of Ruth Allen on behalf of Palmerston North City Council – Feasibility, 28 November 2023

- e. emphasised that submitters had not fielded any expert evidence refuting the Council's position.
- 3.257 We note that both Mr Murphy and Ms Allen returned to the matters above in their supplementary statements of evidence.
- 3.258 Mr Murphy did so on the basis of some queries from us arising from the latest Housing and Business Capacity Assessment and whether there remained some misalignment between demand and feasibility assessments²⁸². He clarified that the Housing and Business Capacity Assessment based its calculations of the contribution to medium and long term housing supply on an assumption that the precursor supporting infrastructure would be upgraded in 2026, subject to development agreements and suitable funding (of which he presented evidence to demonstrate Council's commitment). On this basis, he concluded that the NPS-UD Section 3.2(2)(c) test, as well as those other 'sufficiency' tests relating to 'plan enablement' and 'infrastructure readiness'²⁸³, would be met for the medium term.
- 3.259 Ms Allen reported on the results of further high level analysis that found that medium density development would become a feasible option in the medium term and that, in the interim, less dense typologies would remain feasible over that timeframe²⁸⁴.
- 3.260 On that basis, we are now in a position to return to the question we posed earlier - *if the most pressing need was an immediate shortfall in housing supply, then how would this be addressed by a Plan Change that would only release developable land over a medium or long-term timeframe?* The simple answer is that PCG will not address this short term need and the prospect that it would, appears to have been slightly 'oversold' in the documentation supporting the Plan Change proposal.
- 3.261 However, we are satisfied that we have been presented with sufficient, uncontested evidence by Council as to the feasibility and developability of the Plan Change area and its contribution to addressing the City's housing needs from the medium term onwards. In that context, we find that that the Council's Plan Change proposal meets the 'sufficiency' tests set out in Section 3.2 of the NPS-UD. We therefore conclude that the rationale for the rezoning wrought by the Plan Change is sound.

Appropriateness of rezoning

- 3.262 Having settled the matter above, we now turn our attention to the overall appropriateness of rezoning the area in question from a mix of predominantly Rural Zone (together with portions zoned Residential, Recreation, and Conservation and Amenity and Rural-Residential Overlay) to a mix of predominantly Residential and Conservation and Amenity Zones (together with a Local Business Zone and Rural-Residential Overlay).
- 3.263 We have already established that none of the specific topics addressed above, under **Issue 1** to **Issue 11**, are determinative in the sense that they represent an impediment to rezoning the subject site. From an effects perspective, and based on the foregoing assessment, we conclude that none of the identified effects are of such magnitude that leads us to consider that the rezoning of the site in the manner now proposed is inappropriate.

²⁸² Supplementary Statement of David Murphy on behalf of Palmerston North City Council – Strategic Planning, 11 March 2024

²⁸³ NPS-UD Sections 3.2(2)(a) and (b), respectively

²⁸⁴ Supplementary Statement of Ruth Allen on behalf of Palmerston North City Council – Feasibility, 11 March 2024

3.264 In other words, it is our finding that there is no fundamental impediment in terms of site constraints or environmental values that would preclude development of the site for the purposes proposed by the Plan Change. We concur with Ms Johnston's and Mr Sinclair's submissions on behalf of the Council in this respect²⁸⁵.

Most appropriate Plan Change provisions framework

3.265 As we observe above, none of the specific topics or issues raised in submissions and/or during the hearing process have been determinative in the sense that they represent an impediment to rezoning the subject site.

3.266 This is reflected in the absence of contested expert evidence and the fact that points of contention during the hearing were largely limited to planning considerations. In other words, it is not so much the 'why' that has been at issue during the course of the hearing, but the 'how'.

3.267 In this context, the planning matters that remained in contention during the hearing are determinative to the finding we must reach regarding the most appropriate Plan Change provisions framework to avoid, remedy and/or mitigate adverse effects arising from the development of the area enabled by its rezoning.

3.268 The relevant planning matters can be broken down into the following:

- The form and nature of Plan Change provisions relating to medium density housing;
- Achieving an appropriate balance between levels of prescription and flexibility in managing development;
- The role of the Conservation and Amenity Zone in maintaining and enhancing environmental values associated with the gully network; and
- The extent, if any, to which requests made by PNIRD relating to rezoning and alternative roading connections should be accommodated. Specifically, whether the:
 - Rural-Residential Zone Overlay should be applied over 'Area A' at the south-west boundary of the Green Block;
 - Rural-Residential Zone Overlay should be applied over 'Area B' at the north-east boundary of the Green Block;
 - Turitea Valley Terrace Link Road should be provided for; and
 - 'Gully 9' road connection should be provided for.

3.269 We deal with each of these matters below before reaching an overall finding as to the appropriateness of the planning framework introduced by the Plan Change as it now stands.

²⁸⁵ Closing Submissions on behalf of Palmerston North City Council, 11 March 2024, para 97

Form and nature of Plan Change provisions relating to medium density housing

- 3.270 Issues over the form and nature of Plan Change provisions relating to medium density housing emerged from debate around the point at which such housing typologies become feasible (if at all); and eventually go to the broader question around an appropriate balance between prescription and flexibility in the Plan Change provisions. In a broader sense, we have dealt with the former matter earlier in this section (under the heading **Rationale for rezoning**) and will turn to the latter question under the next sub-heading below (**Achieving an appropriate balance between levels of prescription and flexibility in managing development**).
- 3.271 With respect to the case for medium density housing, we are satisfied with the body of evidence that the Council has fielded in this respect, not least Mr Cullen's and Ms Allan's evidence with respect to the economics and feasibility of medium density housing over the medium term, respectively, which has not been countered in any equivalent technical evidence on behalf of submitters.
- 3.272 In response to the planning evidence of Mr Thomas and Ms Coats for Woodgate Ltd *et al.* and Heritage Estates (2000) Ltd, respectively, Mr Cullen shared his experience with medium density housing in concluding that the relative remoteness of Aokautere was offset by its size, its neighbourhood centre offering, the synergistic and symbiotic relationship between that centre and medium density housing typologies, and a changing demographic situation supportive of greater housing diversity²⁸⁶.
- 3.273 In response to the same witnesses, Ms Allen clarified that her feasibility modelling incorporated the costs of site development with some contingencies and that local market research was undertaken to inform the modelling assumptions²⁸⁷. These factors go to her (and our) overall finding that medium density housing is a feasible proposition over the medium term.
- 3.274 Having satisfied ourselves as to the feasibility of medium density housing, we can now turn our minds to the form and nature of the Plan Change provisions providing for this housing typology. As the Council observed in its closing legal submissions²⁸⁸, the matter of medium density was a topic of some discussion at the hearing, including whether the intended approach to density in PCG was 'mandatory or 'enabling'.
- 3.275 Ms Copplestone originally turned her mind to the matter in the context of her Section 42A Report²⁸⁹, wherein in response to submissions, she concluded that certain further amendments were warranted, inclusive of:
- a. changes to certain policies to make them more outcome focused while accommodating a greater degree of flexibility as to the manner of delivery;
 - b. changes to certain rules to provide greater clarity and flexibility or remove unnecessary constraints (notably a rear yard setback); and
 - c. to certain policies and rules to enable rather than require medium density housing on the promontories.

²⁸⁶ *Statement of Reply Evidence of Michael Cullen on behalf of Palmerston North City Council, Urban Economics*, 28 November 2023, paras 9 - 29

²⁸⁷ *Statement of Reply Evidence of Ruth Allen on behalf of Palmerston North City Council – Feasibility Assessments*, 28 November 2023, paras 9 and 16 - 17

²⁸⁸ *Closing Submissions on behalf of Palmerston North City Council*, 11 March 2024, para 84

²⁸⁹ *Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning*, 15 September 2023, pages 166 - 185

- 3.276 In the context of her reply statement and in response to the evidence of Mr Farquhar (for Heritage Estates (2000) Ltd), Ms Copplestone was of the view that, beyond the amendments proposed in her Section 42A Report to provide additional flexibility with respect to medium density housing, no further changes were necessary²⁹⁰. We also note, at this point, Mr Burns's observation (in response to Heritage Estates (2000) Ltd's position) that in the Aokautere Medium Density Village Area minimum densities would apply to whole subdivisions or superlots (i.e., flexibility remains at the scale of individual lots); and that, in his view, the Structure Plan and provisions remained flexible regarding dwelling type²⁹¹.
- 3.277 Mr Burns returned to this matter in his supplementary statement²⁹², setting out the results of a yield comparison he had undertaken for the Medium Density Village Area, based on the Plan Change's target minimum net average residential density of 25 dwellings per hectare and incorporating a range of housing types. By his calculation, the Village Area could reasonably achieve a yield of 296 lots, representing a potential uplift of 110 lots above a suburban low density yield equivalent. Overall, across the Plan Change area, he observed that a mix of housing types and densities would be achieved, via medium density in the Village Area, flexible densities on the promontories, rural-residential lots, and standard low density elsewhere.
- 3.278 That aside, Ms Copplestone was moved to further consider the form and nature of provisions relating to medium density housing in her supplementary statement in response to the submissions and evidence and questions from the Panel as to whether the approach to medium density housing was 'mandatory' or 'enabled', and efficient and effective in any case. She clarified that the approach was 'directive' in nature and primarily driven by default consent status for land use (discretionary) and subdivision (non-complying) where stated densities are not achieved in the Medium Density Village Area. However, to better signal this approach, she recommended further amendments to the policy framework and rules to reference the density outcomes sought²⁹³. In her view:
- '... when considering effectiveness and efficiency of the provisions, the standards work to provide for a range of potential dwelling types and price brackets to accommodate market/developer preferences; consistent with the NPS-UD requirements, and over a range of development time frames.'*²⁹⁴
- 3.279 Nevertheless, it was evident from the JWS²⁹⁵ that there remained a level of disagreement among the planning witnesses over the extent to which (if at all) the Plan Change should dictate the provision of medium density housing, beyond or ahead of the market (or at least the preferences of the local development community).
- 3.280 Ms Copplestone provided a s32AA assessment of the most significant recommended amendments to the Plan Change provisions relating to medium density housing (as well as other matters) identified in her supplementary statement²⁹⁶. Broadly speaking, these further recommended amendments sought to make more explicit the dwelling densities

²⁹⁰ Statement of Reply Evidence of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 28 November 2023, paras 102 - 106

²⁹¹ Statement of Reply Evidence of Andrew Burns on behalf of Palmerston North City Council – Urban Design, 28 November 2023, para 40

²⁹² Supplementary Statement of Andrew Burns on behalf of Palmerston North City Council, Urban Design, 11 March 2024, paras 14 - 21

²⁹³ Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, paras 125 - 126

²⁹⁴ Ibid., para 130

²⁹⁵ Joint Witness Statement of Planning Experts, 15 and 16 November 2023, under "Topic 3: Housing Delivery"

²⁹⁶ Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, Annexure 3: Section 32AA Evaluation, under the heading 'Housing Density'

sought in particular locations via a series of changes and additions to objectives, policies, rules and performance standards. We note that they also included a trigger for an intersection upgrade assessment in the event that a medium density residential development proposal is forthcoming without a prior subdivision consent, on the basis of a recommendation by Ms Fraser²⁹⁷.

- 3.281 We accept the Council's position²⁹⁸ that a directive approach to medium density is necessary to enabling and sustaining the neighbourhood centre, achieving positive urban design outcomes and providing for a broader range of housing typologies in the area to suit the community's diverse and changing needs; and that, ultimately, this is all necessary to achieving a well-functioning urban environment at Aokautere. We accept further that in the absence of a mandatory approach we could have little or no confidence that these outcomes would be achieved. We consider that there are suitable elements of flexibility built in the PCG provisions as they now stand. We anticipate that developers will rise to the challenge in meeting the changing needs of the market.
- 3.282 We adopt the Council's recommended amendments to the Plan Change and accept Ms Copplestone's findings that the recommended approach is both more effective, in providing a suitably clear, certain and directive policy framework for the purposes of assessing subdivision and land use development proposals, and more efficient, in that the default consent status provides a sufficient basis for achieving the required outcome, while the density standard provides for a range of dwelling types, therefore catering to market / developer preferences. We further agree that the economic and social benefits of the recommended approach outweigh the (limited) costs to developers.

Achieving an appropriate balance between levels of prescription and flexibility in managing development

- 3.283 As noted in the Council's opening legal submissions²⁹⁹, one of the key issues remaining at large related to whether the Plan Change should be more, or conversely less, enabling of development; and, more specifically, whether the level of detail in the Structure Plan was overly prescriptive and inflexible and, as a consequence, whether the implementing provisions were overly prescriptive.
- 3.284 We have already addressed this matter where it specifically relates to provision for the neighbourhood centre (under **Issue 9**) and medium density housing (immediately above). However, given the pervasive nature of the theme throughout the course of the hearing, we consider it important to deal with it in a broader sense also. It goes not just to the concerns of submitters but our own interest in striking a balance between prescription and flexibility and our questioning of Council officers as alluded to in paragraph 2.42 of this report.
- 3.285 Ms Copplestone initially addressed the matter in response to submissions in her Section 42 Report, both generally and also specifically in the context of providing for subdivision within the Greenfield Residential Area, rural-residential subdivision within the Structure Plan area, and design controls in the Residential Zone³⁰⁰. We also heard from Mr Burns about the level of prescription in the Structure Plan and why, from his perspective, it reflected a need to ensure development continued in a more co-ordinated and connected

²⁹⁷ Supplementary Statement of Harriet Fraser on behalf of Palmerston North City Council – Transport, 11 March 2024, paras 12 - 13

²⁹⁸ Closing Submissions on behalf of Palmerston North City Council, 11 March 2024, paras 86 - 88

²⁹⁹ Opening Submissions on behalf of Palmerston North City Council, 4 December 2023, para 33

³⁰⁰ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, pages 57 – 61, and pages 191 – 196, 196 – 199 and 199 – 208, respectively

manner, albeit that he agreed that greater flexibility was warranted in some specific respects³⁰¹.

- 3.286 We also heard from a number of developer submitters and their planning witnesses on the matter, notably Mr Farquhar and Ms Coats, and Mr Fugle and Mr Thomas for Heritage Estates (2000) Ltd and Woodgate Ltd *et al.*, respectively. Mr Thomas, for instance, was of the firm view that a more schematic approach to structure planning in the Plan Change area was warranted.
- 3.287 It was evident that the planning witnesses remained at odds over the balance between prescriptiveness and flexibility associated with the Structure Plan approach. Ms Coplestone, on one hand, was of the view that a suitable balance had been struck; whereas Mr Thomas (together with Ms Pilkington and Ms Coats) considered that the approach remained too detailed and rigid and insufficiently aligned with the preferences of developers³⁰².
- 3.288 In light of this we asked Ms Coplestone to consider how a 'general accordancy' approach might apply to elements of the Structure Plan that were considered 'flexible'. We also asked her to consider and test several consenting scenarios incorporating her recommended amendments. She obliged us by turning her mind to the matter in the context of her supplementary statement³⁰³.
- 3.289 Before addressing Ms Coplestone's response, we note that Ms Johnston, on behalf of the Council, provided a useful commentary on the meaning of 'general accordancy' as informed by case law³⁰⁴.
- 3.290 Acknowledging the inherent tension in being obliged to deliver a 'flexible' feature, Ms Coplestone recommended that a distinction be made between elements identified as 'fixed' being provided in 'general accordancy' with the Structure Plan and others being assessed in accordancy with their 'consistency' with the Structure Plan. She proposed additional amendments and additions to policies, activity status, performance standards and the Structure Plan to accommodate this approach. The practical effect of the approach being that the entry level activity status for rules that require 'general accordancy' or 'consistency' is restricted discretionary, with non-complying activity status assumed where the former is not achieved, and discretionary activity status where the latter is not. She then tested the approach to consenting scenarios including an entirely new road or the absence of a road in the context of the Structure Plan. In her view, this exercise attested to the suitability of the approach, balancing as it did elements of certainty and flexibility.
- 3.291 Ms Coplestone's recommended solution to this matter was informed by the supplementary statements of Ms Fraser, Mr Phillips and Ms Baugham, who all assisted in identifying 'fixed' and 'flexible' roading elements, reserve locations and stormwater infrastructure locations, respectively. All 'fixed' and 'flexible' (or at least, 'non-fixed') elements were set out in an annexure to Ms Coplestone's supplementary statement including, in each case, her view as to why the level of directiveness was deemed appropriate³⁰⁵.

³⁰¹ Section 42A Technical Report of Andrew D. Burns on behalf of Palmerston North City Council, Technical – Urban Design, 15 September 2023, paras 83 - 89

³⁰² As summarised in the Joint Witness Statement of Planning Experts, 15 and 16 November 2023, under 'Topic 4: Structure Plan approach'

³⁰³ Supplementary Statement of Anita Renie Coplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, paras 9 – 26

³⁰⁴ Closing Submissions on behalf of Palmerston North City Council, 11 March 2024, paras 78 - 83

³⁰⁵ Supplementary Statement of Anita Renie Coplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, Annexure 4: Aokautere Structure plan – Structure Plan elements and how they are intended to be delivered.

3.292 Ms Copplestone also attached to her supplementary statement a s32AA assessment of the most significant recommended amendments to the Plan Change provisions to reduce the level of Structure Plan detail, insert 'general accordance' and 'consistency' considerations, and make the other changes outlined above³⁰⁶. We find that the refined recommended approach represents an elegant solution and practical means of balancing prescriptiveness and flexibility. We accept and adopt Ms Copplestone's s32AA findings in this respect.

3.293 Overall, we consider that Council officers have gone as far as they practically can in addressing the concerns of submitters on this broad matter, bearing in mind that the Plan Change has not been crafted in isolation but within the context of an existing relatively prescriptive and certainly very detailed operative District Plan.

Role of Conservation and Amenity Zone in maintaining and enhancing values associated with the gully network

3.294 The extent of the Conservation and Amenity Zone and the level of gully protection were matters that remained at large ahead of, and during the hearing³⁰⁷. Our consideration of the place of this zone in the overall scheme of things naturally follows on from our earlier findings in relation to ecological and indigenous biodiversity values, geotechnical constraints and natural hazard risks, natural character, visual amenity and landscape values, stormwater management and provision for reserves³⁰⁸.

3.295 Consequently, we do not consider that this matter needs a great deal of further attention. We simply record that we accept the conclusions that Ms Copplestone reached in her supplementary statement³⁰⁹, in response to queries from us regarding the role of the zone, how it gives effect to the higher order statutory framework, how geotechnical, landscape and natural environment within the gully areas are accounted for and how these would be addressed when assessing proposed works in the gullies.

3.296 Broadly, Ms Copplestone concluded that:

- a. the application of the zone in the areas concerned aligns with its purpose as set out in the operative District Plan and the policy direction that PCG (as further amended), the RPS, the NPS-IB, NPS-FM and s6(a), 6(b) and (c) of the RMA provide;
- b. there is scope in submissions to amend the PCG policy framework to more closely align with the NPS-IB gazetted subsequent to the notification of the Plan Change (and the adoption of the RPS);
- c. the zone provides a suitable basis for managing effects on natural character associated with the gullies and related waterbodies;
- d. the zone rules allow for limited development in the gullies associated with essential services and apply suitable matters of discretion relating to the mitigation of natural hazard effects, informed by required geotechnical assessments;

³⁰⁶ *Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning*, 11 March 2024, Annexure 3: Section 32AA Evaluation

³⁰⁷ *Opening Submissions on behalf of Palmerston North City Council*, 4 December 2023, para 33

³⁰⁸ **Issues 1 to 5**, respectively

³⁰⁹ *Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning*, 11 March 2024, paras 31 - 62

- e. these rules (as Ms Copplestone proposed to further amend) also give additional prominence to natural landforms; and
- f. vesting of gullies accorded with a Conservation and Amenity zoning will occur at the time of subdivision.

3.297 In reaching these conclusions, Ms Copplestone partially and appropriately relied on the uncontested evidence of Mr Bird, Dr Forbes and Mr Hudson on geotechnical, ecological and landscape matters, respectively.

3.298 We find agreement with the Council's position that:

*'... the Conservation and Amenity zone is integral to delivering the outcomes sought through PCG. The proposed zoning provides for stormwater management, cultural, amenity and recreational opportunities, landscape values, and the maintenance and enhancement of freshwater – it also will help maintain and enhance biodiversity within the gully network.'*³¹⁰

3.299 It is evident to us that the gullies are a unique feature of the area subject to the Plan Change; and that the proposed zoning and attendant development controls and reserve creation provisions provide a crucial means of ensuring that they are maintained and enhanced as a community asset and, indeed, become readily accessible for the community to appreciate and enjoy.

Accommodation of PNIRD requests relating to alternative roading links and rezoning

3.300 In her Section 42A Report, Ms Copplestone addressed a number of rezoning requests by submitters³¹¹. Briefly, we accept her rationale for recommending a series of amendments to the zoning map in response to those submissions, which primarily relate to the correction of mapping errors.

3.301 The question that remains for us to resolve is whether the requests made by PNIRD relating to rezoning and alternative roading connections should be accommodated. As noted above, these requests sought that the Rural-Residential Zone Overlay be applied over 'Area A' and 'Area B' at the south-west and the north-east boundaries of the Green Block, respectively; and whether the Turitea Valley Terrace Link Road and 'Gully 9' road connection should be provided for.

3.302 Dealing with each of these in turn, we note that Ms Copplestone latterly offered a partial degree of support to the 'Area A' request in her supplementary statement³¹². The area concerned comprises a 7.5 ha block adjacent to Turitea Road, within which a 2.3 ha 'developable area' corresponding to land above the 73m contour has been identified by PNIRD. Relying in part on the advice of Dr Forbes, Mr Bird, Mr Hudson and Ms Baugham, Ms Copplestone recommended that:

- a. the 'developable area' be included within the Rural-Residential Zone Overlay;
- b. a low-lying area occupied by a natural inland wetland be rezoned Conservation and Amenity Zone; and

³¹⁰ Closing Submissions on behalf of Palmerston North City Council, 11 March 2024, para 73

³¹¹ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, under the heading "Topic 17", pages 306 - 316

³¹² Supplementary Statement of Anita Renie Copplestone on behalf of Palmerston North City Council – Planning, 11 March 2024, paras 80 - 89

- c. remaining areas are retained as Rural Zone.
- 3.303 With respect to the 'Area B' request, Ms Copplesstone again offered a partial degree of support³¹³. This area comprises an 8.5 ha block surrounded by land that under the operative District Plan would be enabled for rural-residential development. In planning terms, Ms Copplesstone considered it appropriate to enable the block to be developed in a manner consistent with the surrounding land. In this, she was supported by Mr Hudson's landscape assessment. However, due to the presence of geotechnical and ecological constraints associated with gully landforms identified by Mr Bird and Dr Forbes, respectively, Ms Copplesstone recommended a partial application of the overlay to portions not subject to these constraints, with the remaining portions zoned Conservation and Amenity Zone.
- 3.304 We agree with Ms Copplesstone that submissions seeking the protection and restoration of gullies and indigenous habitats provide the necessary scope to apply the zone changes to 'Area A' and 'Area B' that she recommends.
- 3.305 Turning now to PNIRD's request that the Turitea Valley Terrace Link Road be provided for, Ms Copplesstone recommended that the Structure Plan be amended to include the 'upper section' (between Valley Views Road and the plateau) but not the 'lower section' (between Valley Views and Turitea Roads)³¹⁴. She reached this conclusion primarily on the basis of advice of Council's technical experts:
- a. Dr Forbes and Mr Hudson observed that the lower section would dissect a natural inland wetland and did not support its inclusion on that basis;
 - b. Ms Fraser was also unsupportive of this element as it would overly lengthen and place additional traffic loadings on Turitea Road; and
 - c. Mr Burns was concerned that its inclusion would compromise the achievement of the specified minimum lot size on the southwestern side of the proposed road.
- 3.306 The experts had no such concerns with respect to the 'upper section'; hence Ms Copplesstone's recommendation, which we accept.
- 3.307 Finally, we address PNIRD's request to provide for the 'Gully 9' road connection. On the basis of advice from Ms Fraser that any design issues could be addressed at the resource consent stage, Ms Copplesstone recommended an amendment to the Structure Plan to include this link³¹⁵. We note that the Council's expert witnesses have otherwise raised no material concerns regarding the request.
- 3.308 Overall, we accept the recommendations of Council officers in relation to PNIRD's four requests, together with Ms Copplesstone's accompanying s32AA evaluation of the rezoning proposals³¹⁶.

³¹³ *Supplementary Statement of Anita Renie Copplesstone on behalf of Palmerston North City Council – Planning*, 11 March 2024, paras 90 - 100

³¹⁴ *Supplementary Statement of Anita Renie Copplesstone on behalf of Palmerston North City Council – Planning*, 11 March 2024, paras 65 - 74

³¹⁵ *Ibid.*, paras 75 - 79

³¹⁶ *Supplementary Statement of Anita Renie Copplesstone on behalf of Palmerston North City Council – Planning*, 11 March 2024, *Annexure 3: Section 32AA Evaluation*, pages 26 - 31

Overall finding as to appropriateness of Plan Change provisions framework

- 3.309 Subject to the amendments to the provisions that we have adopted from the Council Written Reply statement and that are incorporated into the version attached as **Appendix 2**, we agree with Council officers that the Plan Change provisions as now cast will suitably manage all relevant effects; and are the most appropriate way to achieve the objectives of the Plan Change, the existing objectives of the District Plan and the purpose of the RMA.
- 3.310 That being the case, we now move to assess our conclusions in light of the relevant policy framework at a national, regional and local level.

Objective and policy framework

Resource Management Act

- 3.311 We agree with the position of the Council³¹⁷ that, overall, the proposed Plan Change is not inconsistent with the principles of the RMA as set out in s6 and s8 of Part 2 and the Council's functions under s31 of the RMA; and further, that the adoption of the Plan Change will assist in:
- a. preserving the natural character of wetlands and rivers and their margins, and protecting them from inappropriate use and development (s6(a));
 - b. protecting significant indigenous vegetation and significant habitats of indigenous fauna (s6(c));
 - c. managing significant risks from natural hazards (s6(h));
 - d. enabling the efficient use and development of natural resources (notably, in our view, land) (s7(b));
 - e. maintaining and enhancing amenity values (s7(c));
 - f. maintaining and enhancing the quality of the environment (s7(f));
 - g. achieving integrated management of the effects of the use, development and protection of land and associated natural and physical resources (s31(1)(a));
 - h. ensuring that there is sufficient development capacity in respect of housing and business land to meet expected demands of the City (s31(1)(aa))
 - i. controlling of any actual or potential effects of the use, development, or protection of land, including for the purpose of the avoidance or mitigation of natural hazards and the maintenance of indigenous biodiversity (s31(1)(b));
 - j. controlling the emission of noise and its mitigation (s31(1)(d)); and
 - k. ultimately achieving the sustainable management purpose of the RMA (s5).

National Policy Statements / National Environmental Standards

- 3.312 We agree with the Council's assessment that the proposed Plan Change aligns with and gives effect to the relevant objectives and policies of the NPS-UD, and in particular

³¹⁷ *Opening Submissions on behalf of Palmerston North City Council*, 4 December 2023, paras 50 – 55 and *Closing Submissions on behalf of Palmerston North City Council*, 11 March 2024, para 8

Objectives 1 to 6 and Policies 1 and 2; and will assist the Council in meeting its obligations as a Tier 2 authority³¹⁸.

- 3.313 We also agree with the Council's assessment that the proposal gives effect to the NPS-IB, to the extent possible and, in particular to Policies 13 and 14, which mandate councils to promote and facilitate the restoration of indigenous biodiversity and set a target of achieving over 10% native cover in urban areas, respectively³¹⁹.
- 3.314 Again, to the extent that it is able, we concur with the Council in finding that the Plan Change, though provisions relating to the vesting and protection of gully systems and natural wetlands, gives effect to the NPS-FM³²⁰.
- 3.315 We further accept the position of Council officers that the NPS-HPL is not applicable to PCG, as the latter was notified prior to the commencement of the former; and also that while the NPS-ET does have relevance given that the National Grid Bunnythorpe-Milton 110KV transmission line passes through the Plan Change area, its operation will not be compromised by the area's development³²¹.

Regional Policy Statement

- 3.316 We find that the Section 32 Report associated with the Plan Change³²², supplemented by Ms Copplestone's own assessment³²³, correctly identified the relevant objectives and policies of the RPS (which forms Part 1 of Horizons' One Plan), drawing particular attention (at an objective level) to:
- a. Objective 2-1: Resource management;
 - b. Objective 3-1: Infrastructure and other physical resources of regional or national importance;
 - c. Objective 3-2: Energy;
 - d. Objective 3-3: The strategic integration of infrastructure with land use;
 - e. Objective 3-4: Urban growth and rural residential subdivision on versatile soils;
 - f. Objective 4-2: Regulating potential causes of accelerated erosion;
 - g. Objective 5-2: Water quality;
 - h. Objective 6-1: Indigenous biological diversity;
 - i. Objective 6-2: Outstanding natural features and landscapes, and natural character; and
 - j. Objective 9-1: Effects of natural hazard events.
- 3.317 We find that the Plan Change is consistent with these RPS objectives and associated policies, including Policy 6-2, relating to the management of biodiversity at a regional

³¹⁸ *Opening Submissions on behalf of Palmerston North City Council*, 4 December 2023, paras 38, 42 and 43 and *Closing Submissions on behalf of Palmerston North City Council*, 11 March 2024, paras 40 - 50

³¹⁹ *Closing Submissions on behalf of Palmerston North City Council*, 11 March 2024, paras 51 - 56

³²⁰ *Closing Submissions on behalf of Palmerston North City Council*, 11 March 2024, para 57

³²¹ *Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning*, 15 September 2023, pages 28 - 29

³²² *Palmerston North City District Plan – Section 32 – Plan Change G: Aokautere Growth Area, 2022*, pages 16 - 23

³²³ *Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning*, 15 September 2023, pages 32 - 42

level, which we agree with the Council needs to be read alongside and in the context of obligations placed on councils by the more recently gazetted NPS-IB³²⁴.

Regional Plans

- 3.318 We have not been presented with any evidence to suggest that the proposal is inconsistent with the relevant provisions of the Horizons' One Plan, but that is to be expected given that they are intended to direct the Regional Council's consideration of consent applications, rather than the consenting responsibilities of territorial authorities.

Palmerston North District Plan

- 3.319 We find that the Section 32 Report correctly identified the relevant objectives and policies of the District Plan³²⁵; and we agree with Ms Copplestone's assessment³²⁶ that the proposed Plan Change, together with the further amendments recommended, are consistent with those objectives (and related policies) and represent the most appropriate way of achieving them.

Non-Statutory Strategies and Plans

- 3.320 We concur with the assessment in the section32 report³²⁷ that the Plan Change is generally consistent with Council's strategic growth planning as encapsulated in its non-statutory strategies and plans, inclusive of its long term plans, city spatial plan, city growth plan, infrastructure strategy, innovative and growing city strategy, housing needs and business assessment, and housing capacity assessment.

Iwi Engagement

- 3.321 Rangitāne O Manawatū, as iwi partners, engaged in informal discussion with Council about the Plan Change in 2018. Further engagement occurred in 2020 and 2021 on the draft provisions. A Cultural Impact Assessment was commissioned and received in 2020 and included in appendix 6 of the proposed plan change. A formal submission was made by Rangitāne O Manawatū to the Plan Change (submission 77). Rangitāne representatives are supportive of the Plan Change and the proposals to protect the gully network, freshwater values, provide housing choice and provide for accidental discoveries in particular.
- 3.322 On the above basis we are satisfied that cultural relationships and values have been recognised and provided for in the Plan Change.

³²⁴ Closing Submissions on behalf of Palmerston North City Council, 11 March 2024, paras 59 - 61

³²⁵ Palmerston North City District Plan – Section 32 – Plan Change G: Aokautere Growth Area, 2022, pages 24 - 27

³²⁶ Section 42A Report of Anita Renie Copplestone on Behalf of Palmerston North City Council, Planning, 15 September 2023, page 326 and at various points in her reply and supplementary statements

³²⁷ Section 32 Report page 27-29

4 STATUTORY CONSIDERATIONS

4.1 Drawing on consideration of the Plan Change material, the submissions and further submissions, and the evidence presented, this part of our report addresses the statutory requirements outlined at the start of **Section 3** above.

4.2 We have adopted a thematic approach to presenting our findings in this respect, using relevant *Colonial Vineyards* criteria as a ‘road map.’ In particular, we rely on the detailed reasoning in **Section 3** and have added to it where appropriate in the context of each thematic question we outline in turn below.

Is the Plan Change designed to accord with, and assist the Council to carry out its functions so as to achieve the purpose of the Act?

4.3 As set out in paragraph 3.311, we find that the Plan Change is consistent with the principles of the RMA as set out in s6, s7 and s8 of Part 2 and the Council’s functions under s31 of the RMA. Further it will advance the Council’s obligations under s7(b), (c) and (d) and functions under s31(1)(a), (aa), (b) and (d) commensurate with the purpose of the RMA (s5).

Does the Plan Change give effect to any NPS or the NZCPS?

4.4 As set out in paragraphs 3.311 to 3.315, we find that the Plan Change gives effect to the NPS-UD, and also to the NPS-IB and NPS-FM, to the extent that it is able, and is not inconsistent with the NPS-ET.

The NZCPS and NPS-HPL are not relevant to the Plan Change.

Does the Plan Change give effect to the Regional Policy Statement?

4.5 As summarised in paragraphs 3.316 and 3.317, we find that Plan Change provisions are consistent with the relevant RPS provisions.

Is the Plan Change consistent with any regional plans or proposed regional plans?

4.6 We were not presented with any evidence to suggest that the proposal is inconsistent with the One Plan.

What (if any) regard should be given to relevant management plans and strategies under other Acts, including any relevant entry in the Historic Places Register?

4.9 The site to which the Plan Change relates is not identified in any RMA policy statement or plan as having any special historical or cultural significance, and we have not been presented with any evidence to the contrary.

To what extent does the Plan Change need to be consistent with the plans or proposed plans of adjacent territorial authorities?

- 4.7 We were not advised of any cross-boundary issues that require any particular measures to be adopted by the Plan Change. We are satisfied that the proposal has had sufficient regard to the extent to which it needs to be consistent with other plans of other territorial authorities.

Are the provisions the most appropriate way to implement the "objectives," having regard to their efficiency and effectiveness, actual and potential environmental effects and reasonable alternatives?

- 4.10 As set out under our preamble in **Section 3** of this report, there are two suites of 'objectives' that we have considered, being:
- a. the District Plan objectives that the Plan Change seeks to amend or introduce; and
 - b. the settled, relevant objectives of the operative District Plan.
- 4.11 Assessing the former first, we consider that the proposed provisions have been explicitly designed to be effective and efficient at implementing the District Plan objectives as amended or sought to be introduced by the Plan Change's stated purpose. Moreover, the amendments to the proposed Plan Change provisions arising since notification as set out in **Appendix 2** have been made for the purposes of improving clarity and / or effective implementation. We are satisfied that the appropriate analysis under s32AA has been completed in that regard.
- 4.12 With respect to the settled, relevant objectives of the operative District Plan, we have previously indicated (at paragraph 3.319) that we agreed with Ms Copplestone's assessment that the proposed Plan Change, as it is now formulated, represents the most appropriate way of achieving them.

5. OVERALL DECISION

- 5.1 Based on our consideration of all the material before us, including the Section 42A Reports from the Council's advisors, submissions, further submissions, evidence presented at the hearing and following consideration of the requirements of section 32AA and other relevant statutory matters, and for the reasons we have set out above in **Sections 3** and **4**, we decide that:
- a. the Plan Change be **accepted** as notified, and as further amended prior to, during and subsequent to the hearing, as set out in **Appendix 2**;
 - b. all submissions on the Plan Change be accepted or rejected to the extent that they correspond with that conclusion and the matters we have set out in the preceding report sections (and as summarised in **Appendix 1**); and
 - c. pursuant to Clause 10 of the First Schedule of the RMA, Council give notice of our decision on submissions to Plan Change G.

DATED AT WELLINGTON THIS 6th DAY OF MAY 2024



DJ McMahon
Chair, Independent Hearing Commissioner



S McGarry
Independent Hearing Commissioner



L Johnson
PNCC Councillor
(Appointed as a Commissioner)

APPENDIX 1

Panel decisions on relief sought by submissions and further submissions

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S1.001	Bo Yu	Whole of Plan Change	Oppose	I am opposed to this change.	[No specific relief sought]	Reject
S2.001	Mark Currin	Whole of Plan change - Adderstone Reserve option	Oppose	My family and I am opposed to any widespread development in Aokautere and in particular, the proposed changes to the Adderstone area/Pacific drive. There is already traffic congestion in the Summerhill area, it will ruin the rural/semi-rural feel of the area, the housing density is already high, there is a lack of shops and amenities, and current spaces will be destroyed for ever.	I seek the council to decline authorising any widespread development for the reasons I have already set out.	Reject
S2.002	Mark Currin	General - Traffic and transport	Oppose	My family and I am opposed to any widespread development in Aokautere and in particular, the proposed changes to the Adderstone area/Pacific Drive. There is already traffic congestion in the Summerhill area.	I seek the council to decline authorising any widespread development for the reasons I have already set out. Certainly, no significant development should proceed without first building a new bridge across the Manawatu river as there is already far to much traffic on the Fitzherbert Avenue route during rush hours.	Reject
S3.001	Jason Raman	Structure Plans (General)	Not Stated	What are the rights of homeowners directly impacted by development/construction work where damages occurs to homes due to ground moving from heavy machinery and vehicles? What plans are in place to manage noise and air pollution from dust etc Also, with the new connection for 208 Pacific Drive, what disruption to access my property given new road needs to be constructed? What are timelines for construction to commence?	New connection for 208 Pacific Drive and the development of new residential section next to 206 Pacific Drive. Please advice of what rights or compensation homeowners have to safeguard their homes from disruptions.	Reject
S4.001	Audrey Shepherd	Whole of Plan change - Adderstone Reserve option	Support in part	I am happy about the overall plan regarding the Aokautere urban growth and the repurposing of parts of Adderstone Reserve.	[No specific relief sought]	Reject
S4.002	Audrey Shepherd	General - Traffic and transport	Oppose	I would like to express my concern about the proposed pedestrian crossing of SH57 between	Maybe a tunnel under the road would be safer.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				Cashmere Drive and Johnston Drive. This piece of road has significant visibility issues and a pedestrian crossing would complicate an already difficult drive.		
S4.003	Audrey Shepherd	General - Traffic and transport	Not Stated	The corner of SH57 and Cashmere Drive is quite difficult. There is poor visibility when moving out of Cashmere Drive onto SH57 and there is no right turning bay when driving from Ashhurst.	[No specific relief sought]	Reject
S5.001	David Basire	Section 32 Report - Appendix 5: Traffic Assessment	Support in part	Right hand turn from Old Farm Road to SH57 is already an issue at peak traffic times, and needs improvement as soon as possible.	A merging lane for traffic turning right out of Old Farm Road would assist with traffic flows, allowing a turn with a traffic gap from the right only. However, with the number of vehicles turning right onto Old Farm Road from Summerhill Drive, this is only a minor improvement, and a longer term plan must be looked at.	Accept
S5.002	David Basire	Section 32 Report - Appendix 5: Traffic Assessment	Support	I support the signalling of the intersection from SH57 to Pacific Road, including better options for pedestrians, and cyclists.	I support the signalling of the intersection from SH57 to Pacific Road, including better options for pedestrians, and cyclists. I would strongly recommend that the traffic speed limit for the road between Old Farm Road to at least Johnstone Road be reduced to 50 (preferred) or 60 KPM.	Accept
S5.003	David Basire	Section 32 Report - Appendix 5: Traffic Assessment	Support in part	Whilst I support improvements to the lower Ruapehu Drive to Summerhill intersection, I do not support taking away a right turn out of Ruapehu Drive. The proposed roundabout at Williams Terrace is not a great option for traffic going towards town.	An alternative allowing a safe right hand turn out of Ruapehu Drive needs to be considered.	Accept
S5.004	David Basire	Section 32 Report - Appendix 5: Traffic Assessment	Support	I strongly support the improvement of Ruapehu Drive to Summerhill intersection for cyclists.	Either of the proposed options would improve conditions, if the signalled alternative is chosen, this should also accommodate cars turning right out of Ruapehu Drive towards town.	Accept
S6.001	Jessica Somerton	Section 32 Report - Appendix 13: Parks and	Oppose	I oppose the planned walkway to go through the council land that backs onto our section at 88 Johnstone Drive. The path would be quite close to	Please consider an alternative placement for the walkway so that it does not back onto our yard directly. If the decision is made for	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
		Reserves Servicing Memorandum		our house and would create a safety issue with people having access to the back of our house. This makes me feel uneasy.	this walkway to back onto our land, I would like the Council to consider there to be some security installed (fencing, planting, etc.) so that our house is not directly accessible to people walking along the path.	
S6.002	Jessica Somerton	General - Traffic and transport	Support in part	This is a busy intersection and with the continued growth, it will become dangerous.	I would like to Council to consider a roundabout at the intersection of Summerhill Drive (SH57) and Old West Road. I support the pedestrian crossing to be created. It would be good if the speed limit could be reduced in this stretch of road.	Accept
S6.003	Jessica Somerton	General - Open space and recreation	Not Stated	Not stated.	I would like the Council to consider an area for skating in the new development.	Accept in part
S7.001	Alan Smeaton	Section 32 Report - Appendix 13: Parks and Reserves Servicing Memorandum	Support	Figure 15 in the Parks and Reserves Servicing Memorandum shows options for extending walkways, including options for connecting walkways from this area to Tutukiwi Reserve. I fully support the specific provisions which the Council has planned for the Aokautere area. More housing is needed, and this takes into account the need to provide green spaces and recreation areas.	I fully support the specific provisions which the Council has planned for the Aokautere area. I would like to see some form of connection from the end of Abby Road linking to the proposed connection (black line) across the gully and into Moonshine Valley Reserve, even if that means an alleyway through any housing development which crosses its path.	Accept in part
S7.002	Alan Smeaton	General - Traffic and transport	Support in part	Looking at the wider picture of development, it will be good to have all the additional housing as proposed, however I am concerned about Aokautere and Summerhill Drives and the increased traffic carried on these roads.	I would like to see a roundabout at the Old W Road junction, because for many residents in Greenwood and Jasmine Places it is very hard, particularly at busy times of the day, to turn right into Summerhill Drive. Having a roundabout would present an option for people to turn left and go right around the roundabout before heading into the city.	Accept in part
S8.001	Warren Sara	General - Traffic and transport	Not Stated	The area already struggles as it is with traffic without putting hundreds more sections up there. Yes, you will have to look at state highway 57 etc etc but at the end of the day its all going to bottle	[No specific relief sought]	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				neck at a bridge over the river that is way inadequate.		
S9.001	Karen Wilton	Section 32 Report - Summary of Proposals	Support	<p>I am supportive of the Aokautere development proposal - it's a great idea to make good use of this lovely part of the region and hopefully at the same time take the pressure off the existing city and overdevelopment there.</p> <p>Care needs to be taken to ensure mixed development of housing and I support the option of a new residential village page 2 10(c) - great to see our senior citizens considered.</p>	Commit to a strategic and systematic growth plan rather than haphazard development - eg ensure that the proposed business (including essential petrol station) do actually happen.	Accept
S9.002	Karen Wilton	Section 32 Report - Summary of Proposals	Support	I am supportive of the Aokautere development proposal - it's a great idea to make good use of this lovely part of the region and hopefully at the same time take the pressure off the existing city and overdevelopment there.	The tracks and gully are a city asset and great to see their future safeguarded.	Accept
S9.003	Karen Wilton	Section 32 Report - Summary of Proposals	Support	<p>It is logical to ensure development of business and housing - residents in the new area should have access to local shops, childcare etc.</p> <p>Care needs to be taken to ensure mixed development of housing and I support the option of a new residential village page 2 10(c) - great to see our senior citizens considered.</p>	Commit to a strategic and systematic growth plan rather than haphazard development - eg ensure that the proposed business (including essential petrol station) do actually happen. Care needs to be taken to ensure mixed development of housing and I support the option of a new residential village.	Accept
S9.004	Karen Wilton	Section 32 Report - Summary of Proposals	Not Stated	Please make sure section sizes are restricted to protect this area from having no green - quality of life for residents and wildlife needs decent garden spaces to retain character of this area.	Ensure the minimum allowed section size. Ensure the new suburb has a socially and environmentally successful space by specifying housing with decent garden and privacy spaces.	Accept
S9.005	Karen Wilton	Section 32 Report - Appendix 5: Traffic Assessment	Not Stated	Traffic flow and access will be one of the biggest issues. Great that there is reference to second bridge - it would be crazy to proceed with this development without providing for a second main artery, especially in these times of climate change.	Commit to the PNITI of a second bridge - it can't just be on the never, never and in the end will determine the success of this development.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				Fiddling with traffic flows in Fitzherbert is a very short term solution only - aside from many angry citizens we will be the landlocked laughing stock of NZ if we trap ourselves in with one bridge!		
S9.006	Karen Wilton	General - No specific provision referenced	Support	Care needs to be taken to ensure mixed development of housing.	Please work with Kainga Ora so that we locally control and can influence their developments to include this new area - there's an opportunity for them to build from scratch and not keep making crammed ghettos for people in social housing.	Accept in part
S10.001	Stephen & Carole Sorsby	General - Traffic and transport	Oppose	<p>The proposal [Section 32 Report] states that following the initial development of Pacific Drive, developers were allowed to continue development without an overarching plan, the only constraints apparently being the land restrained for services, parks or reserves. The consequences of this, again clearly stated in the document, has been a disconnected neighbourhood with almost all traffic entering or leaving the development through Pacific Drive.</p> <p>Those living on Pacific Drive, closer to state highway 57, including IPU which straddles Pacific Drive, now have to endure the increasing noise and inconvenience as a relative quiet, short suburban road has become a highway. Bear in mind that when the original houses were built double-glazing was not mandatory meaning that those who built with living areas to the front of their property are now seriously impacted.</p> <p>It is evident from the proposal that the absence of a district plan over the past 15-20 years now limits what the planners are able to achieve in terms of a logical traffic plan that would dilute traffic flows around the development. Consequently, they plan to manage traffic through "junction upgrades "along Pacific Drive adding to</p>	<ol style="list-style-type: none"> 1. That the request to change to the District plan G: Aokautere Urban growth be declined. 2. That a traffic management plan is developed and approved that provides alternative routes onto SH57, reducing the flow on to Pacific Drive from those areas currently under development. 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the noise and inconvenience of the existing residents.		
S10.002	Stephen & Carole Sorsby	General - Traffic and transport	Oppose	<p>The proposal [Section 32 Report] states that following the initial development of Pacific Drive, developers were allowed to continue development without an overarching plan, the only constraints apparently being the land restrained for services, parks or reserves.</p> <p>The consequences of this, again clearly stated in the document, has been a disconnected neighbourhood with no managed traffic flows and almost all traffic entering or leaving the development through Pacific Drive. This was not clear to purchasers when initial consents were granted. Those living on Pacific Drive, closer to state highway 57, including IPU which straddles Pacific Drive, now have to endure the increasing inconvenience as a relative quiet, short suburban road has become a highway.</p> <p>It is evident from the proposal that the absence of a district plan over the past 15-20 years now limits what the planners are able to achieve in terms of a logical traffic plan that would dilute traffic flows around the development. Consequently, they plan to manage traffic through "junction upgrades "along Pacific Drive adding to the noise and inconvenience of the existing residents. Moreover, the additional traffic, is likely to be bunched together by the upgrades, increasing both waiting times and danger when entering onto SH57 which itself is carrying increasing traffic from the Tararua and Hawkes Bay districts.</p>	<ol style="list-style-type: none"> 1. That the request to change to the District plan G: Aokoutere Urban growth be declined. 2. That a traffic management plan is developed and approved that provides alternative routes onto SH57, reducing the flow on to Pacific Drive from those areas currently under development . 	Reject
S11.001	Des Waters	Structure Plan: Map 7A.4E	Oppose	The green space is what makes us special. The roads and schools won't cope. The public transport is not good enough.	I would like the proposal to be dropped and more green space and keep existing green space.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
		Adderstone Reserve Option		The cost associated with getting across town will impact on some individuals. The shops and infrastructure is at capacity at the present time. The walk ways and foot paths are not kept well enough and are dangerous for the increased number of people especially young children.		
S12.001	Ian King	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support	The map is a little hard to follow re boundary of subdivisions and what's happening where and when it is proposed to happen. The colored key looks different. The lines which show as solid lines but the key is in little squares and dots. And it's hard to read the letter points of interest or change. Thanks for sending it out but reading it and interpreting it is difficult. Needs a better presentation for the residents in the area where we live. It is very pleasant living here and we like the area after living in Hokowhitu for many years.	I support the proposal. The map needs to be clearer including the information on it. The information should have been split up and numbered to make it easier to read and find what's proposed.	Accept
S13.001	Mary Morgan-Richards	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	I oppose development that reduces habitat for native plants and animals so wish to see an amendment that would provide greater protection for wetlands and canopy trees.	I oppose development that reduces habitat for native plants and animals so wish to see an amendment that would provide greater protection for wetlands and canopy trees. The council should identify mature native canopy trees within the Aokautere area and legally protect them.	Accept in part
S13.002	Mary Morgan-Richards	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	Active transport is an excellent way of saving money on health care. Currently Turitea Road has a great deal of use by members of the public on bikes, walking dogs, jogging, riding horses. As with other local rural roads there are no footpaths, but the one-way bridges slow traffic. Map 7A.3E (H, I, Q) shows a new planned connection between Valley View	I support the council making plans to improve paths for walking, jogging and cycling. Wish to see amendment - I do not wish to see this connection (I and Q) made into a road for cars. The increased traffic from the new housing has the potential to greatly increase	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				road and Turitea road. If this connection remains as a cycle/walking track it will be good news for the new development. Loop tracks are valuable for walking, jogging, cycling. If the connection I and Q is used by vehicles it will result in accidents as increased traffic compete with "active transport".	traffic load on small roads not suitable for 80km/hour speeds.	
S13.003	Mary Morgan-Richards	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support		I support the council making plans to increase housing in Palmerston North.	Accept in part
S14.001	Stewart Davies	Section 32 Report - Appendix 15: Technical Report Summary	Not Stated	The traffic assessment to include an upgrade of SH57 and Cashmere Drive intersection. [Photo included].	<ol style="list-style-type: none"> To recommend to Waka Kotahi the inclusion of a right hand turn lane from SH57 into Cashmere Drive and a right hand turn lane from Cashmere Drive into SH57. Reduction of speed from 70kph to 60kph. 	Reject
S15.001	Lynne Rea	Section 32 Report - Appendix 5: Traffic Assessment	Support in part	<p>Whilst I am not against changes to the Adderstone Reserve per se, I am concerned about the traffic volumes and speed levels (70 kph) at the intersection of Cashmere Drive/SH 57 (Aokautere Dr). I have reviewed the Transportation Assessment and do not believe any of their recommendations will mitigate the problem we have at this intersection, in fact there is every possibility it will be worse.</p> <p>I believe that whilst realigning for changes to Abby Road etc. it is an opportune time to take into consideration alterations to this intersection.</p> <p>At the Cashmere intersection, when wanting to turn right onto SH 57 (Aokautere Dr), there is limited vision of traffic approaching from the left (Johnston Drive direction) due to the angle of the corner. With expected increase in volume of traffic, as mentioned in the Transportation Assessment, this will become more dangerous. There is also an issue when coming along SH 57</p>	I would like the Council to investigate the feasibility of a roundabout at the intersection of Cashmere Drive/SH 57 (Aokautere Dr), along with a lowered speed limit (50 kph?).	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				(from Johnston Drive direction) to turn right into Cashmere Dr, as there is limited vision (again due to the angle of the corner) to see oncoming traffic and for vehicles behind you to note your intention beforehand, there is no slip lane to allow someone to come through on your inside.		
S16.001	Brian Hewson	Whole of Plan Change	Not Stated	Intrigued as to why Palmerston North is following Auckland and going for urban sprawl rather than intensification in inner city areas.	Provide more detail on the proposal and its impacts.	Accept in part
S16.002	Brian Hewson	General - Traffic and transport	Not Stated	<p>Intrigued as to whether a traffic plan has been incorporated into this proposal or whether it is an afterthought. I can see issues with traffic numbers exiting this area and significant impact on Tiritea Valley Road and Valley Views. There will also be impact for those in the Ruapehu Drive, Silkwood Place and Cashmere Drive areas attempting to exit and travel west along Aokautere Drive during busy morning periods. There will also be significantly more impact on motorists/cyclists attempting to exit Old West Road/SH57 onto Aokautere Drive to travel north/east.</p> <p>I am intrigued as to why Valley Views and Tiritea Valley Road were not included in the proposal given it is likely both of these rural residential areas will end up being high speed traffic routes for residents in the new residential areas.</p>	Provide more detail on the proposal and its impacts.	Accept
S16.003	Brian Hewson	General - Traffic and transport	Not Stated		Fill in potholes as Palmerston North is now becoming known as Pothole Palmy and that will necessitate a change in branding.	Reject
S17.001	Inga Hunter	General - Stormwater, erosion and flooding	Oppose	<p>The extension of housing to the top of the hill above Moonshine Valley Road, especially the first 500 metres or so is extremely concerning with regard to the increased risk of flooding and stormwater overflowing causing landslides.</p> <p>The recent flooding is an example of current and future weather changes with climate change, so</p>	I wish to have the provisions amended to prevent housing between the last gully before the start of the downhill slope and the hill and for this area to be made a reserve. I would like considerably more space left between housing and the edge of the hill to Moonshine Valley Road. I would also suggest using the last gully as the edge to the housing	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				<p>the amount of rain falling on this area is only going to increase in volume. The soil does not absorb water very well so surface run-off is a real problem already.</p> <p>I do not believe that adequate consideration has been given to the increase in water drainage, the poor soil absorption and the already substantial water flow this area already receives and does not cope with.</p> <p>Retention ponds are inadequate and will overflow in winter. Water currently streams down the hill, under and around my house, down my drive to the road and across to my neighbours.</p> <p>Increasing housing density close to the edge of the slope will disturb the existing water flows and increase stormwater volumes, especially in winter when the current drainage is already overwhelmed and markedly increase the risk of landslides to both the new and existing housing on Moonshine Valley Road.</p> <p>It is avoidable if the plans are amended to move housing further away from the end of the slope to Moonshine Valley Road.</p>	with water drainage to the main road and large stormwater drains so that there is no possibility of water coming over the edge. A reserve with increased water retention and disbursement systems could be made in place of housing.		
FS18.016	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p> <p>Note: The flood modelling information provided to</p>	Accept in part	That the submission is accepted	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the submitters does not contain sufficient base information to enable the submitter to brief and engage a stormwater expert to peer review the accuracy of the flood model relied on for PC-G. The parameters and inputs into the flood modelling have not been available to the submitter.		
S18.001	Robert McLachlan	Whole of Plan Change	Oppose	<p>I oppose the Proposed Plan Change G on the grounds that:</p> <ol style="list-style-type: none"> 1. It would increase emissions, rather than decrease them. 2. It would create low-density suburban sprawl leading to Palmerston North's most car-dependent suburb. 3. The proposal does not take into account recent changes to the National Policy Statement on Urban Development or the Emissions Reduction Plan. <p>The proposal is to add about 1030 dwellings on 450 hectares, leading to a density of a bit over 2 dwellings per hectare - exceptionally low. The very low density is due both to the site (which contains some gullies, and potentially up to 10% native bush cover) and to the traditional suburban layout with a lot of sections for single family homes. (There are some medium-density parts, but they are included in the total.).</p> <p>Contrast this to the famous low-car development of Vauban, Germany, in which 2000 dwellings were built on a 38 ha site from 1998-2006.</p> <p>The overall design looks like Hamilton development of the 1960s - single family homes, wide streets separated by bushy gully - acceptable 60 years ago but disastrous with the present climate emergency.</p> <p>In addition to the low density, the location is far from the centre of Palmerston North, which (as</p>	<ol style="list-style-type: none"> 1. Pause work on the Plan and place a moratorium on single-home-sprawl until PNCC's and Horizon's responses to the May 2022 NPS-UD modifications and to the ERP are in place. 2. Check that PNCC's climate plan meets current national climate targets, such as the 1.5oC warming target of the Paris Agreement, and is best practice relative to other New Zealand cities and to best practice in similar cities worldwide. Before lifting the moratorium, determine what proportions of new housing types (fringe/existing/CBD, low/medium/high density) are commensurate with our climate and other urban targets. 3. Demonstrate that PNCC and HRC can provide high quality active and public transport infrastructure and achieve the required mode shift. 4. Investigate low-car developments. 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>the proposal notes) most residents will be travelling to and from. The submission notes it is 3.5km from one end of the region to Aokautere Drive and 9km to the Square. The existing part of this suburb is already one of the most car-dependent parts of the city. Only 1% of residents get to work by bus (4% walk, 4% bike), and I suspect most of those are in the older parts of Poutoa with a journey of less than 9 km.</p> <p>The suggested mitigation factors (Table 12) (for the predicted extra 8000 vpd) are mostly about improving the road layout for cars.</p> <p>The factors cited in the traffic report as influencing an increase in the active and public mode to counter this - amounts to shifting costs and responsibility onto other parts of our society and the planning system.</p> <p>Very wide streets (21m reserve) so that buses can get around easily, also detracts from the urban environment.</p> <p>Simply providing on-road cycleways is not going to be sufficient to avoid the growth in car traffic when the factors that cause it are designed into the layout of the suburb.</p> <p>The traffic report does note the goal of reducing emissions 30% by 2030, but it does not quantify the effect of the proposal on emissions, or how any of the listed mitigations would help.</p> <p>The location is terrible for schools, with no options for primary-aged children to travel to school independently. This will further lock in car dependency. Even if the village centre materializes, there will be very few services that people will walk to. Even the supermarket will be 3.5 km away from the far end of the suburb, this</p>		

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>pattern of development will induce car trips, not avoid them.</p> <p>Submission refers to the 2022 modifications to the NPS-UD in relation to the Intensification Planning Instrument, and specifically policies 5, Objective 8 and Policy 11 and questions whether the RPS or District Plan has been modified yet in response.</p> <p>Submission refers to the alternative approach to planning in the context of climate change taken in Wellington and Auckland, and cites the Auckland Transport Emissions Reduction Plan in relation to some land use decisions undermining emission reduction goals and the National Emissions Reduction Plan - Transport Target 1, and Action 10.1.1 in relation to the relationship between urban form and transport emissions.</p>		
S18.002	Robert McLachlan	Whole of Plan Change	Oppose	<p>I oppose the Proposed Plan Change G on the grounds that:</p> <ol style="list-style-type: none"> 1. It would increase emissions, rather than decrease them. 2. It would create low-density suburban sprawl leading to Palmerston North's most car-dependent suburb. 3. The proposal does not take into account recent changes to the National Policy Statement on Urban Development or the Emissions Reduction Plan. <p>The overall design looks like what was built in Hamilton in the 1960s, single family homes and wide streets separated by bushy gullies. That was understandable 60 years ago but in the present climate emergency it would be disastrous. Frankly, I was ashamed to be reading all the fine words about reducing emissions, transforming to a low carbon transport system, etc., in a proposal that does completely the opposite.</p>	<p>Check that PNCC's climate plan meets current national climate targets, such as the 1.5oC warming target of the Paris Agreement, and is best practice relative to other New Zealand cities and to best practice in similar cities worldwide. Before lifting the moratorium, determine what proportions of new housing types (fringe/existing/CBD, low/medium/high density) are commensurate with our climate and other urban targets.2. Demonstrate that PNCC and HRC can provide high quality active and public transport infrastructure and achieve the required mode shift.3. Investigate low-car developments.</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>In addition to the low density, the location is far from the centre of Palmerston North, which (as the proposal notes) most residents will be travelling to and from. The existing part of this suburb is already one of the most car-dependent parts of the city. There is a suggestion that increasing active and public transport mode share would limit the increase in car traffic to 6000 vpd, but this shifts costs and responsibility onto other parts of our society and the planning system.</p> <p>The traffic report does note the goal of reducing emissions 30% by 2030, but it does not quantify the effect of the proposal on emissions, or how any of the listed mitigations would help. Notes that there are no options for primary-aged children to travel to school independently, which locks in car dependency, and that the village centre will be inadequate in encouraging people to walk to services.</p> <p>[The submission refers to NPS-UD Objective 8 re reducing greenhouse gas emissions and Policy 11. The submission contrasts the proposal with the proposed new RPS for Wellington, and cites Auckland's Transport Emissions Reduction Plan, as well as the National Emissions Reduction Plan - Transport Target 1 and Action 10.1.1.]</p>		
S19.001	James Irwin	General - Traffic and transport	Not Stated	Current active transport options into town from Aokautere leave room for improvement. The only road into town is not separated from the cycleway, the speed limit is 60 kph, and it feels dangerous on a bike. This road will become busier with higher population density.	Please make clear how active (non-vehicular) transport will be incorporated into the plan, and please ensure that active forms of transport are prioritised, as is set out in the council urban cycle network master plan. Please consider slowing down this traffic to 50kph. Please consider physical separation between a cycle lane and vehicular traffic. Please consider a cycleway that is completely separate from the main route for	Accept in part

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					vehicles, for example connecting with the road to the motu o poutoa/pork chop hill. There are already good walkways to town down gullies to town that are away from the road.	
S20.001	Patrick Morgan	Whole of Plan Change	Oppose	<p>We oppose the Proposed Plan Change G on the grounds that:</p> <ol style="list-style-type: none"> 1. It would increase emissions, rather than decrease them. 2. It would create low-density suburban sprawl leading to Palmerston North's most car dependent suburb. 3. The proposal does not take into account recent changes to the National Policy Statement on Urban Development or the Emissions Reduction Plan. <p>The proposal is to add about 1030 dwellings on 450 hectares, leading to a density of a bit over 2 dwellings per hectare - exceptionally low. The very low density is due both to the site (which contains some gullies, and potentially up to 10% native bush cover) and to the traditional suburban layout with a lot of sections for single family homes.</p>	<ol style="list-style-type: none"> 1. Pause work on the Plan and place a moratorium on single- home-sprawl until PNCC's and Horizon's responses to the NPS-UD and ERP are in place. 2. Check that PNCC's climate plan meets current national climate targets, such as the 1.5oC warming target of the Paris Agreement, and is best practice relative to other New Zealand cities and to best practice in similar cities worldwide. Before lifting the moratorium, determine what proportions of new housing types (fringe /existing /CBD, low/medium/high density) are commensurate with our climate and other urban targets. 3. Demonstrate that PNCC and HRC can provide high quality active and public transport infrastructure and achieve the required mode shift. 4. Investigate low-car developments. 	Accept in part
S20.002	Patrick Morgan	Whole of Plan Change	Oppose	<p>We oppose the Proposed Plan Change G on the grounds that:</p> <ol style="list-style-type: none"> 1. It would increase emissions, rather than decrease them. 2. It would create low-density suburban sprawl leading to Palmerston North's most car dependent suburb. 3. The proposal does not take into account recent changes to the National Policy Statement on Urban Development or the Emissions Reduction Plan. 	<p>Pause work on the Plan and place a moratorium on single-home-sprawl until PNCC's and Horizon's responses to the NPS-UD and ERP are in place.</p> <p>Check that PNCC's climate plan meets current national climate targets, such as the 1.5oC warming target of the Paris Agreement, and is best practice relative to other New Zealand cities and to best practice in similar cities worldwide.</p> <p>Demonstrate that PNCC and HRC can provide high quality active and public transport</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					infrastructure and achieve the required mode shift. Investigate low-car developments.	
S21.001	Prasika Reddy	Section 32 Report - Appendix 11: Stormwater Management Strategy	Not Stated	I just wanted to raise a concern here that there are residents who live in Moonshine Valley and Whisky Way who are very concerned about the storm water and slippage issues that will be created. The maps just show the assessments of the area of the proposed development. What about an assessment of the land adjacent to it. Can we have a stormwater report done for the areas that our properties lie on because we are seeing worse rainfall every year.	Can we have a Stormwater technical report done for the residents of Moonshine Valley and Whisky Way who border the development - specifically how the stormwater and slippage will affect our area.	Accept
S21.002	Prasika Reddy	Section 32 Report - Appendix 9: Geotechnical Assessment	Not Stated	I just wanted to raise a concern here that there are residents who live in Moonshine Valley and Whisky Way who are very concerned about the storm water and slippage issues that will be created. The maps just show the assessments of the area of the proposed development. What about an assessment of the land adjacent to it. Can we have a geotechnical report done for the areas that our properties lie on because we are seeing worse rainfall every year.	Can we have a Geotechnical technical report for the residents of Moonshine Valley and Whisky Way who border the development...specifically how the storm water and slippage will affect our area.	Accept
S22.001	Dennis Thomas	General - No specific provision referenced	Support	I support the concept of better planning for growth in this area, and the geography seems to make more sense than on a swamp plain on the other side of Palmerston North. Better road and community connectivity is a great concept.	Do not approve the proposed zoning changes until: <ol style="list-style-type: none"> 1. The traffic (and cycling) interface with SH57 and Summerhill Drive are detailed, and 2. Measures have been put in place to accommodate the large increase in traffic that will flow down these roads, particularly in rush hours. It is not reasonable consider this Proposal in isolation when it has the potential to materially negatively impact the rest of Aokautere's/Fitzherbert's residents.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S22.002	Dennis Thomas	General - Traffic and transport	Support in part	<p>The new shared pathway proposed for a section of SH57 will be of limited utility until the northbound cycle lane is sorted on Summerhill Drive near the coffee cart. The revisions to this part of Summerhill Drive have made cycling more dangerous than it was before (narrower traffic lane, and parked cars limiting visibility for those leaving the garden supplies depot).</p> <p>It is not reasonable to consider this Proposal in isolation when it has the potential to materially negatively impact the rest of Aokautere's / Fitzherbert's residents.</p>	<p>Do not approve the proposed zoning changes until the traffic (and cycling) interface with SH57 and Summerhill Drive are detailed.</p> <p>As the area is mostly flat, I'd like to see dedicated safe cycle and micro-transport routes, ideally off-road (shared) paths specifically incorporated in the designs, particularly from the major residential areas to the proposed village centre and SH57.</p>	Reject
S22.003	Dennis Thomas	General - Traffic and transport	Support in part	<p>Regardless of the quality of the proposed suburb, at the end of the day it appears we are going to see at least twice as many vehicles entering SH57 as now, through the same roads as now. So for those of us who exit on to SH57 by the supermarket/IPC or down Summerhill Drive, it is only bad news. I also note the traffic lights proposed for SH57/Pacific Drive - these will obviously help those going to Palmerston North in the morning, but will be a traffic hindrance the other 23 hours in the day, and will be of no benefit to those of us downstream, including exiting the supermarket.</p>	<p>Do not approve the proposed zoning changes until measures have been put in place to accommodate the large increase in traffic that will flow down these roads, particularly in rush hours.</p> <p>It is not reasonable consider this Proposal in isolation when it has the potential to materially negatively impact the rest of Aokautere's/Fitzherbert's residents.</p>	Accept in part
S22.004	Dennis Thomas	General - Rural-residential development	Oppose	<p>As this is existing farmland, I am opposed to a big chunk of it being rezoned for "rural residential".</p>	<p>Do not agree to the establishment of further rural residential blocks. It should either be future residential or stay as rural land, not be chopped up into lifestyle blocks.</p>	Reject
S22.005	Dennis Thomas	General - Aokautere Neighbourhood Centre	Support		<p>I like the provision for a town centre and possible retirement centre.</p>	Accept

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S22.006	Dennis Thomas	General - Multi-unit residential development	Support		I support the inclusion of areas for multi-unit housing, and think the proposed placements near open spaces and in the town centre are excellent.	Accept
S22.007	Dennis Thomas	General - Traffic and transport	Support in part		Probably not an issue for now, but I'm surprised to see a junction upgrade proposed for Abbey Rd/Pacific Drive, as the former seems no bigger than most suburban streets; and the junction upgrade at Johnstone Drive/Pacific Drive lends itself to a roundabout not lights, given the peak hour flow needs. Do not approve the proposed zoning changes until measures have been put in place to accommodate the large increase in traffic that will flow down these roads, particularly in rush hours. It is not reasonable consider this Proposal in isolation when it has the potential to materially negatively impact the rest of Aokautere's/Fitzherbert's residents.	Accept in part
S23.001	Daniel Carrick	Whole of Plan change - Adderstone Reserve option	Oppose	I think Palmerston North should be building up within the ring road ie apartment buildings, not out where it's using up parks, reserves and farmland.	To leave the reserve as a reserve to keep Palmy Green.	Accept
S24.001	George Kinder	Whole of Plan Change	Not Stated	Not sure.	Not sure.	Reject
S25.001	Shaun Henry	General - Traffic and transport	Support in part	I support the plan change on the condition of an additional driving and cycling bridge. Having formally lived near Pacific Drive it is noticeable that the amount of time to get from Fitzherbert to the Ring Road has increased, especially with the speed zones lowered as you descend down the hill towards Fitzherbert Bridge. An additional bridge at the Kelvin Grove end of the City would be ideal in terms of aligning with the new Train Hub and meeting SHW 57 towards Te Ahu A Turanga. This would change the face of SHW 3 but would bring a	With the growth in the regional surroundings of Palmerston North district and the wider Manawatu, I suggest the need for an additional bridge across the Manawatu Awa, with the focus on high technical infrastructure to meet the demand of the Te Ahu A Turanga - Manawatu Tararua Highway. An additional bridge at the Kelvin Grove end of the City would be ideal. As the proposed suburb comes to a cross road with the State Highway it is important we focus	Reject

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				better flow of traffic around the city and not through.	our spending on both "slower roads" but at the same time roads that are able to carry the significant flow of increased traffic once Te Ahu A Turanga opens to the public.	
S26.001	Maher Fuad	General - Traffic and transport	Oppose		Second crossing over the river.	Reject
S27.001	Linda Rowan	General - Rural-residential development	Oppose	I do not support large lifestyle development properties under the rural-residential category. We need to be fully utilising the land available suitable for housing and not building on prime food production on land surrounding Palmerston North.	That low density (spread) housing sections be removed from the plan and replaced with higher density sections to better utilise the subdivided land.	Reject
S27.002	Linda Rowan	General - Multi-unit residential development	Support	I support more intense housing - multi unit and small section (400m2) residential development on the proposed land. We need to be fully utilising the land available suitable for housing and not building on prime food production on land surrounding Palmerston North.	That low density (spread) housing sections be removed from the plan and replaced with higher density sections to better utilise the subdivided land.	Reject
S27.003	Linda Rowan	General - Traffic and transport	Oppose	I am concerned that there does not seem to be an adequate infrastructure development plan connected to the proposal for increased intensification of housing. How is it proposed that residents will move between the development and Palmerston North? Currently the the traffic density on main routes in the Summerhill area and the road surface conditions can not support an increase in traffic. The congestion on the sole traffic bridge will be back to the conditions of 1990s-2000s. In the event of a major natural disaster there will be no access to/from essential services.	That an infrastructure plan including traffic density and flow to address the increased population on the eastern side of the city (Summerhill-Aokautere) be required as part of the change.	Reject
S28.001	Robyn Johnston	General - Traffic and transport	Not Stated	I understand that PNCC does not have direct control of public transport. However, public transport and active transport links to central Palmerston North, Massey and the Fitzherbert science centres need to be in place before there is further development in Aokautere. Many	An undertaking that further development in Aokautere does not commence until a robust alternative transport system is in place. A network that encompasses Turitea Road would be most effective, as there has been substantial residential growth there in	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>Aokautere residents will work or study in these locations. Current transport options, other than private vehicles, are unsafe or inconvenient.</p> <p>Summerhill Drive is already choked with traffic in the morning and evenings. Without serious improvements in alternative transport, this situation will get substantially worse, with concomitant increases in CO2 emissions, air pollution and traffic noise. If Palmerston North continues to sprawl without proper transport infrastructure, it risks becoming a smaller Auckland.</p>	<p>recent years.</p> <p>Public transport and active transport links to central Palmerston North, Massey and the Fitzherbert science centres need to be in place before there is further development in Aokautere.</p>	
S29.001	Charles Chua	Whole of Plan Change	Oppose	<p>My wife and I are strongly opposing your proposed plan change G: Aokautere urban growth because in our view, your proposal is purely based on greed and not on any real needs for the residents of the city. You have completely ignored the serious and obvious negative impacts on the environment and the residents close by. In our view, future generations would fondly remember you and appreciate your forward thinking if the whole area is turned into a park planted with lots and lots of native trees and children's playgrounds are created. This would not only enhance the attractiveness and reputation of the city but would definitely benefit the wellbeing of all residents and also people from far away.</p>	<p>Drop the whole proposal and turn it into a park where native trees are planted and residents are free to come and enjoy it!</p>	Reject
S30.001	Ee Kheng Ang	General - Stormwater, erosion and flooding	Oppose	<p>There are slips along the hill tops currently; these will only get worse if the retention pond is sited as proposed. Any natural events (heavy rain, earthquakes etc.) will make the situation worse. Despite the planting in the area, my property is potentially in danger of being damaged through overflow and flooding should the retention pond fail.</p>	<p>I am concerned about aspects of the plan so oppose it. Failing that, I would like to see some amendments to the plan, especially in regard to the retention ponds along the top of my property.</p>	Accept in part
FS18.017	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on</p>	<p>Accept in part</p> <p>That the submission be allowed</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the technical information available to submitters in the notified documents. The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.		
S30.002	Ee Kheng Ang	General - Multi-unit residential development	Oppose	My objection is linked to two specific issues. Visual impact - tall (two storey buildings) being the most likely outcomes of more housing along the top of the hill (submitter lives in Moonshine Valley).	If the development goes ahead, the following changes should be accommodated: <ol style="list-style-type: none"> 1. Proposed buildings should be set back at least 15m from the boundary (as has been done for Turitea Valley). 2. Attention be given to the special characteristics of Moonshine Valley Road so as to minimise potential impacts in terms of aesthetic. 	Accept in part
S30.003	Ee Kheng Ang	General - Multi-unit residential development	Oppose	Moonshine Valley Road has special characteristics and is home to some aquatic life including koura, shrimps and short fin eels. My objection is linked to two specific issues, including the potential of development to endanger the existing fauna and flora.	If the development goes ahead, the following changes should be accommodated: Attention be given to the special characteristics of Moonshine Valley Road so as to minimise potential impacts for existing aquatic life.	Accept in part
S31.001	Ralph Sims	Whole of Plan Change	Oppose	Palmerston North City has a Climate Change Plan (2021) that has a target to reduce emissions by 30% within 8 to 9 years. The New Zealand Government also has an Emission Reduction Plan (May 2022). The PNCC proposed Plan Change G pays little attention to greenhouse gas emissions that are likely to increase as a result of the Plan being implemented. As one example, the Transport plan appended (dated 28 July 2022) does not include the PNCC Climate Change Plan (2021) and the word "climate" is only mentioned in Appendix 1 when quoting Objective 4 of Horizon's Regional Land Transport Plan.	Review the entire proposed Plan Change G from both climate mitigation and climate adaptation perspectives. This includes quantifying the potential increase in resulting greenhouse emissions that will result, and their impact on meeting the 2031 target of 30% reduction imposed under the PNCC Climate Change Plan (2021).	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>No assessment has been made to quantify increased emissions resulting from the proposals under Plan Change G, including additional transport:</p> <ul style="list-style-type: none"> - the need for greater urban density to encourage active transport; - the impact of car dependence from any dwellings on the proposed new rural-residential area on the Waters block; - provision of a range of local facilities (including sports amenities) in order to avoid travel demand into the city centre; - use of standard stormwater design parameters not anticipating more frequent heavy rainfalls, and - other similar issues relating to greenhouse gas emissions and adaptation have not been considered. <p>The whole plan exemplifies the traditional concept of building houses (many detached and with large gardens) requiring the need for a roading network to prioritise car access. Alternative urban designs have been demonstrated; the suburb of Vauban in Friburg-im-Bresau, Germany, being a model that could be replicated to some extent in the proposed Plan Change G (see https://www.smartcitiesdive.com/ex/sustainable-citiescollective/words-most-successful-model-sustainable-urban-development/229316/).</p> <p>Due to climate change impacts, we face an uncertain future. Inter alia, traditional urban planning approaches have to become more visionary rather than business-as-usual as is proposed in Plan Change G. Every policy and development by national, regional and local governments now has to be examined under a climate lens for both mitigation and adaptation. This has not been done with proposed Plan</p>		

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				Change G.		
S31.002	Ralph Sims	General - Traffic and transport	Not Stated	<p>The Turitea Road is widely used for cycling, walking, dog walking, and horse riding, not just by locals but also by many city residents and visitors to the city. The Green Corridor runs along much of its length and it is part of the Te Araroa walkway route linking to Greens Road. Due to the close proximity to the city suburbs, many people travel to enjoy these facilities, observe the bird life etc. It therefore needs to be protected as a special recreational area of the city.</p> <p>In that regard, adding one or more new roads that connect to the proposed Plan Change G residential or rural- residential areas would be a retrograde step in maintaining its character.</p>	<p>Other than the existing Valley Views Road that gives access to dwellings in the existing rural-residential area, only footpaths and cycleways should be the links to the present and planned Summerhill area. Incorporate Turitea Road under the proposed Plan Change G as a road of aesthetic significance for recreational activities that need protecting with vehicle traffic minimised and slowed down for safety, noise and aesthetic reasons.</p> <p>To enhance the recreational facilities offered and to encourage more people to enjoy them, the maximum road speed should be reduced to 50 km/h with traffic calming measures imposed along its length.</p>	Reject
S32.001	Sue Cooper	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	<p>I oppose the proposed traffic plan. The proposed measures to ameliorate the increased traffic from 1000 extra households (estimated at 8000 journeys/day) take into account only getting the new traffic onto SH57/Aokautere Drive. Almost all of that traffic will then enter Summerhill Drive - a poorly-maintained two-lane city street that is not a State Highway. The exit from this street to Tennent Drive is already problematic (in either direction it requires merging with traffic approaching at 60kph from behind the drivers right shoulder).</p> <p>Getting onto Summerhill Drive from the Massey University direction (either at the river end or the junction with SH57) is also very difficult. These bottlenecks need fixing before any new houses are permitted. I suggest traffic lights.</p>	<ol style="list-style-type: none"> 1. Carrying out traffic control improvements before any new housing is allowed to be built (even with existing traffic levels, these are badly needed). 2. Traffic lights at the intersection of SH57 and Summerhill Drive. 3. Traffic lights at the intersection of Summerhill Drive and the off-ramp leading to the Science Centres. 4. Traffic lights Summerhill Drive/Tennent Drive. 	Accept in part

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S32.002	Sue Cooper	Section 32 Report - Appendix 5: Traffic Assessment	Not Stated		I believe the new housing should have as many cul de sacs as possible in spite of what the planners believe - these foster community spirit and discourage traffic hoons. Walkways would allow pedestrians to move freely, and GPS navigation is available for emergency vehicles!	Reject
FS16.006	Waka Kotahi NZ Transport Agency		Oppose	<p>Opposed to the proposed promotion of cul de sacs and resultant lack of connectivity.</p> <p>Waka Kotahi supports well-functioning urban environments which facilitate a reduction in emissions and supports mode shift, this requires the transport system to be well connected.</p>	<p>Accept</p> <p>Waka Kotahi seeks this submission is disallowed.</p>	Accept
S32.003	Sue Cooper	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	<p>Nno provision has been made for those already living and working to the west of SH57 on Ruapehu Drive and its cul-de-sacs - approximately 260 houses, two childcare centres, an aged-care facility and a thriving shopping centre including a supermarket which many of the new residents will want to use.</p> <p>Having left-turn only at the junction with Summerhill Drive is farcical, as most exiting from there wish to go the city or Science Centres. No provision at all has been made for those exiting from the SH57 end of Ruapehu Drive (where the shopping centre, childcare centres and aged care facility are located). I again suggest traffic lights at one or preferably both ends. As the land either side of Summerhill Drive at the Ruapehu Drive intersection is not built on, there would be no difficulties in carrying out the required earthworks to create extra lanes.</p>	<ol style="list-style-type: none"> Carrying out traffic control improvements before any new housing is allowed to be built (even with existing traffic levels, these are badly needed). Traffic lights at the intersection of SH57 and Summerhill Drive. Traffic lights at the intersection of Summerhill Drive and the off-ramp leading to the Science Centres. Traffic lights at the intersection of Ruapehu Drive and Summerhill Drive and Mountain View Road. Some provision for traffic exiting Ruapehu Drive to SH57 - a roundabout or traffic lights integrated with those proposed for the Pacific Drive intersection. 	Accept in part
S33.001	Fire and Emergency New Zealand	7: Policy 3.7	Support in part	FENZ supports Policy 3.7 insofar that it promotes the availability of appropriate infrastructure to service developments within the Rural-Residential Area identified on the Aokautere Structure Plan.	Amend Policy 3.7 as follows: i. There is appropriate infrastructure available to service the development, including water supply with sufficient	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				However, FENZ seeks to amend Policy 3.7 to clearly promote the availability of water supply with sufficient firefighting capabilities.	capacity for firefighting purposes and on-site wastewater and stormwater servicing, which ensures there is no increase in effects on surrounding areas;	
S33.002	Fire and Emergency New Zealand	R7.15.2.1	Support in part	FENZ supports Rule 7.15.2 insofar as it requires the design principles in Policy 3.7 to be implemented through the subdivision and development in the Aokautere Structure Plan area, which includes the availability of appropriate infrastructure to service development. Should the relief sought by FENZ to Policy 3.7 be accepted, FENZ would strongly support this point. FENZ seeks an additional assessment criteria in (h), to include criteria to consider firefighting water supply and access. This is to manage the fire safety risk to life, property, and the environment for Rural-Residential Development within the Aokautere Structure Plan area.	Amendment sought: Assessment Criteria ... (h) Rural-Residential Development within Aokautere Structure Plan viii. How the subdivision is supplied with sufficient firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. ix. How the site access provides unhindered access for fire appliances in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.	Reject
S33.003	Fire and Emergency New Zealand	7A: Policy 1.4	Support in part	FENZ supports Policy 1.4 insofar that it promotes the adequate provision of water supply to enable developments within Greenfield Residential Areas. However, FENZ seeks an amendment to Policy 1.4 to clearly promote the availability of water supply with sufficient firefighting capabilities.	Amend Policy 1.4 as follows: To ensure adequate provision of essential services to a level and within a timeframe that will enable development that is appropriate to its location and intended use including water supply with sufficient capacity for firefighting purposes and , wastewater and stormwater supply, telecommunications services, and electricity services.	Reject
S33.004	Fire and Emergency New Zealand	7A: Policy 3.4	Support	Fire and Emergency supports Policy 3.4 insofar as it requires subdivision in the Aokautere Residential Area to be carried out in a manner which does not exacerbate natural hazards.	Retain as drafted.	Accept
S33.005	Fire and Emergency New Zealand	7A: Policy 5.6	Support in part	FENZ supports Policy 5.6 insofar that it promotes the adequate provision of infrastructure to developments within the Aokautere Residential Area. However, FENZ seeks an amendment Policy 5.6 to	Amend Policy 5.6 as follows: To provide an adequate level of infrastructure, and services for the proposed development, including wastewater, stormwater, and water supply with	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				clearly promote the availability of water supply with sufficient firefighting capabilities.	sufficient capacity for firefighting purposes.	
S33.006	Fire and Emergency New Zealand	7A: Policy 5.8	Support in part	FENZ supports Policy 5.8 insofar as it promotes the safe and efficient operation of the transport network for all developments associated with the Aokautere Structure Plan. Adequate access to both the source of a fire and a firefighting water supply is essential to the efficient operation of Fire and Emergency. As such, FENZ seeks to amend Policy 5.8 to ensure the design and layout of any subdivision provides a transport network that provides for sufficient access and efficient movement for emergency service vehicles.	Amend Policy 5.8 as follows: <ul style="list-style-type: none"> Provides sufficient access, and enables efficient movement throughout the network, for emergency service vehicles. 	Reject
S33.007	Fire and Emergency New Zealand	R7A.5.2.1	Support in part	FENZ supports R7A.5.2.1 insofar as it controls subdivision in a Greenfield Residential Area. Adequate access to both the source of a fire and a firefighting water supply is essential to ensure the safe and efficient operation of FENZ in an emergency. As such, FENZ seeks an amendment to R7A.5.2.1 to provide Council with the ability to consider the extent to which firefighting water supply and access is provided for subdivisions within the Greenfield Residential Area. FENZ considers this will improve the safety and wellbeing of communities in these areas.	Amend R7A.5.2.1 as follows: Any subdivision in a Greenfield Residential Area which is not a Controlled Activity, and any cross lease, company lease or unit title subdivision creating allotments requiring vehicular or foot access to a road listed in 20.6.1.6 of the Land Transport Section as a State Highway or a Limited Access Road is a Restricted Discretionary Activity with regard to: ...u. The extent to which sufficient firefighting water supply, and access to that supply, is provided.	Reject
S33.008	Fire and Emergency New Zealand	R7A.5.2.2	Support in part	FENZ supports R7A.5.2.2(b) insofar as it requires all new lots to have water supply connections. However, the provision of an adequate firefighting water supply, and access to that supply, is vital to ensure FENZ can effectively respond to a fire emergency. As such, FENZ seeks an amendment to this performance standard to ensure the design and layout of any subdivision provides a transport network that provides for sufficient access and efficient movement for emergency service vehicles. FENZ supports R7A.5.2.2(h) insofar as it sets out	Amend as follows: (b) Essential services x. All new lots must be provided with sufficient firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. (h) Transport Network Requirements for Aokautere Structure Plan As part of any subdivision within the	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the transport network requirements for Aokautere Structure Plan. However, a reference to the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 has not been included therefore adequate consideration for emergency service vehicles is not assured. Adequate access to both the source of a fire and a firefighting water supply is essential to the efficient operation of FENZ in an emergency situation. FENZ considers that the standard is currently insufficient in providing safe and effective access for firefighting purposes throughout the transport network for Aokautere Structure Plan.	Aokautere Residential Area the following infrastructure requirements must be completed and certified by Council before development, or in the case of (iii), (iv) and (v) below, completion and certification of the infrastructure requirements at the identified level of service thresholds must be provided for as part of the staging of the subdivision and development: x. Safe and effective access for emergency service vehicles is provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008;	
S33.009	Fire and Emergency New Zealand	15.5: Policy 1.6	Support	FENZ supports Policy 1.6 insofar as it promotes the provisions of essential services and roading infrastructure within the gully network in Aokautere.	Retain as drafted.	Accept in part
S33.010	Fire and Emergency New Zealand	R15.5.4.1	Support in part	FENZ supports R15.5.4.1 insofar as it promotes the provision of appropriate roading and essential services for developments within the Aokautere Structure Plan area. However, adequate access to both the source of a fire and a firefighting water supply is essential to ensure the safe and efficient operation of FENZ in an emergency. Further, FENZ requires the ability to efficiently manoeuvre its appliances throughout the road network of any future developments within the Aokautere Structure Plan area. As such, FENZ seeks to amend R7A.5.2.1 to provide Council with the scope to consider the extent to which firefighting water supply and access is provided for subdivisions within the Greenfield Residential Area. FENZ considers this will improve the safety and wellbeing of communities in these areas.	Amend as follows: Roading and Essential Services provided for in the Aokautere Structure Plan area a Restricted Discretionary Activity with regard to: ... <ul style="list-style-type: none"> The extent to which sufficient firefighting water supply, and access to that supply, is provided. Efficient movement throughout the network is provided for emergency service vehicles. Assessment Criteria: x. How a sufficient firefighting water supply, and access to that supply, in accordance with the New Zealand Fire	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. x. Safe and effective access for emergency service vehicles is provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008;	
S34.001	Ray & Judy Stevens	General - Multi-unit residential development	Oppose	<p>We wish to register our deep concern at the proposed rezoning of the farmland adjacent to the south boundary of Moonshine Valley which will allow small sections with multi unit dwellings. The loss of soil surface to allow rain to soak in will be considerable from both these dwellings and the roads servicing them.</p> <p>Mitigation by council is proposed with retention ponds at intervals along the top of the slopes but these will not cope with our increased rainfall events and water will inevitably overflow down the slopes into the roadside drains. We have a culvert across our land which takes water from these roadside ditches. It is already damaged from excess water so this will only get worse. We also have the Moonshine Valley stream through our property which has become badly damaged by the extra volume of water flowing from the subdivision at the head of Pacific Drive (Brian Green Development) so any more storm water discharged from these proposed new developments, whether in single events or in a more uniform discharge, will cause even more damage to the banks of the stream. [Photos supplied with submission].</p>	We totally oppose this plan of subdivision into small sections with intensification of dwellings for the farmland adjacent to Moonshine Valley.	Reject
S35.001	Douglas Pringle	Whole of Plan Change	Not Stated	Palmerston North City Council subscribes to the WHO Safe communities and has a specified strategic direction of 'Small city benefits, big city ambition'. The Safe Communities Plan primarily contributes to the Palmerston North City Council's	It is recommended the PC G includes a health and safety technical report indicating alignment or divergence to the strategies	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>goal of connected and safe communities.</p> <p>Given PNCC subscription to the WHO safe communities, it is odd that a technical report from the Safe Communities perspective is not included in the PCG.</p> <p>Planners have a responsibility for community safety through their work planning new communities. While section 39 of the Health and Safety in Employment Act (which places a legal responsibility on designers of structures as having a primary duty of care to those present in the workplace) may not extend to the design of public spaces, the submitter draws a parallel to illustrate the gravitas of the responsibility for the planning process.</p>	articulated in the PNCC Safe Communities Plan.	
S35.002	Douglas Pringle	Section 32 Report - Appendix 5: Traffic Assessment	Not Stated	<p>There is already a rest home and shopping centre north of SH57. The PCG proposes setting aside an area south of SH57 for a future school and retirement village. There is an immediate community safety issue in that the dominant shopping centre of Summerhill Village is on the other side of SH57.</p> <p>While the proposal for a smaller shopping centre south of SH57 mitigates some of the safety issues, it is unlikely the smaller centre would cater for more specialised services such as a Pharmacy or Farmers Market.</p> <p>The transport assessment proposed signalisation at SH57 Aokautere Drive/Pacific Drive would allow safer passage of pedestrian and cyclists.</p>	<p>It is essential signalling is installed to access SH57 (from Pacific Drive) and that should be completed urgently prior to development of the plan change area.</p> <p>It is recommended the signalling, pedestrian path separation and design cater for young children and older residents, as well as the fit and readily mobile.</p>	Accept
S35.003	Douglas Pringle	Section 32 Report - Appendix 5: Traffic Assessment	Not Stated	<p>It is surprising the PCG doesn't include an assessment of the additional traffic on Turitea road from the peri-urban roads A and B. This is considered a major oversight. The following are safety concerns regarding Turitea Road:</p>	<ol style="list-style-type: none"> 1. The planning process is halted until Turitea Road is assessed as recommended by the Transport Planning Engineer. 2. The assessment to take cognisance of the shared use of Turitea Road 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>1. Turitea Road is part of the 3000km Te Araora walkway which traverses New Zealand. Walkers are forced out of the green corridor to use the oneway bridges. The walkway guide [cited in full submission] contains a warning about the busyness of Turitea Road.</p> <p>2. Bikers cannot or do not use the green corridors. The planted green corridors are only suitable for walkers. As such bikers tend to use the length of Turitea road.</p> <p>3. Parts of the Turitea Road are used by professional dog walker services.</p> <p>4. Turitea with its rural residential properties is popular with horse riders. These are also forced to use the one way bridges and road carriageway where there is no berm.</p> <p>5. The S bend south of Valley Views Road intersection has no berm on either side. Council has provided a walking track only bypass. This by pass doesn't cater for bikes or horse riders. North bound pedal bikes tend to go slowly to the uphill gradient. This forces vehicles to travel at the same speed behind them due to the narrow road and reduced visibility.</p> <p>6. There is insufficient sight line on the give way when travelling north the one land bridge nearest to Ngarere Park Road. The sight line is obscured by a low ridge to the North West. As such, entry on to the bridge can place the north bound driver at fault and at risk of a collision, as south bound vehicles may be out of sight behind the ridge. The setting sun at mid equinox also causes a hazard in that a south bound the vehicle emerging into view is also coincident with looking directly into the setting sun. This hazard is increased if the north bound traffic is only moving slowly, if horse riders, pedestrians or bike riders are using the bridge.</p> <p>7. The one land bridge South of Valley View Road intersection has extended single lanes through the</p>	<p>by horse,walkers and pedal bike riders.</p> <p>3. The Te Araora Trail walkers are provided with off carriageway passage (ie footpath).</p> <p>4. That Turitea Road including its bridges is upgraded at minimum to peri urban standard (ie two lane with separate pedestrian/bike/horse path).</p> <p>5. Turitea Road improvement should be complete prior to development of the plan change area, particularly given the Te Araroa status and mortality history.</p>	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				use of centre medium poles. The poles were installed as a result of double fatality near this bridge in 2018. The length of the single lanes create extra wait for vehicles when walkers, horses, or pedal bikes are using the bridge. 8. Heavy trucks are users of Tutitea Road. These service forestry areas, Palmerston North water supply infrastructure, and industry in Harts Road.		
S35.004	Douglas Pringle	Whole of Plan Change	Not Stated	<p>There is no noise assessment in the technical reports.</p> <p>At the Mighty River Turitea windfarm call in, the development of Aokautere residential zone would have more than minor noise disturbance from the wind turbines to the East of Aokautere. The Mighty River call in resulted in the turbine nearest to proposed PCG development being removed, although that was done predominantly for visual aesthetics to preserve the outstanding natural skyline features.</p> <p>The anticipated noise assessment in the original wind farm proposal extended westward to the edge of the IPU college location. The PCG proposal extends potential dwellings in a South West direction taking them closer to the now consented and built wind turbines. Wind turbine noise is a potential negative health affect to those closer to the turbines, particularly on sleep disturbance at night time with low speed wind flows.</p>	It is recommended a boundary noise assessment of the consented wind farms is undertaken and overlaid with the PC G to establish which properties are likely to experience a more than a minor noise effect. The LIM on affected properties should include wind turbine noise disturbance and dwelling design may need to include acoustical considerations.	Accept in part
S35.005	Douglas Pringle	R20.4.2	Not Stated	Truck kerb crossing: The submitter has resided until recently in Kelvin Grove which has a number of truck commercial crossings, which service truck depots or supermarket. Some of these are too small to allow longer trucks to do a left turn off the carriage way. Either the trailer wheels cross the berm or alternatively the front of the truck has to move into the opposing carriage way in order to increase the radius of the turning.	It is recommended the kerb crossing widths to commercial centres in the PG6 is increased to allow trucks to do a left hand turn without entering the opposing traffic lane.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S35.006	Douglas Pringle	6.1.3: Policy 1.1	Not Stated	Road safety signage stability: Along the higher reaches of Ngahere Park road signage construction is inadequate to withstand the wind. This results in either the signs blowing over or rotating in the wind. There doesn't appear to be a routine mechanism for PNCC to rectify these occurrences and as such the signage remains in its damaged state for years. Signage in the peri urban road that passes near the water reservoirs is also likely to be subject to wind damage.	It is recommended road way finding and safety signs are constructed in a way that they stay up and face the intended direction when the wind blows.	Reject
S36.001	Nathan Meyer	Structure Plan: Map 7A.4	Oppose	I absolutely oppose the development of the D1-D4 Promotory clusters of multi-unit housing. What is the Council thinking? Below these narrow fingers of land is a special group of rural properties who are already suffering the erosion effects of development all around. [Submission includes photos of erosion damage]. Why on earth does PNCC plan to put multi density housing so close to a rural setting. Money, thats why.	I would seek the PNCC to completely scrap all multi density dwellings on the narrow fingers of land overlooking Moonshine Valley. There is absolutely zero need for this type of dwelling so far from the CBD. I still struggle to comprehend the thinking behind such thoughtless development.	Reject
S37.001	Lew Thompson	R10.6.3.3	Oppose	We built a new family home in Moonshine Valley Road in October 1994. We moved out here for the special nature of Moonshine Valley, for its open space, lifestyle living and its privacy. 28 years later, this is still hugely important to us. I am open to the fact that the land above Moonshine Valley will one day be developed. But I care very much for what impact this may cause to our open space and privacy and the special nature of our valley.	I would be very much against having multi-storey units or apartments or high density building such as the Woodgate subdivision - this would go against everything about our lifestyle valley. I would be open to larger sections like Titirangi or Polson Hill Road if they were built well back from the Moonshine Valley boundary line.	Accept in part
S37.002	Lew Thompson	General - Traffic and transport	Support in part		Another bridge over the Manawatū River should be thought about to handle the extra housing.	Reject
S38.001	Marie Thompson	General - Multi-unit residential development	Oppose	We built a new home in Moonshine Valley 28 years ago - 1994. We loved the special nature of the valley and still do. As a foundation original owner we value the nature of our road it is why we continue to reside here. We would value buildings that complement the nature of the road.	I am against multi storey invasive apartments on the ridge above the valley as it will compromise the nature of our valley. I would like to see single storey housing that is spaced on sections larger than the Woodgate development.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S38.002	Marie Thompson	General - Multi-unit residential development	Neutral	I am aware of slips on the hills, as we have experienced this on the hill behind our home.	I am against multi storey invasive apartments on the ridge above the valley as it will compromise the nature of our valley. I would like to see single storey housing that is spaced on sections larger than the Woodgate development.	Accept in part
S39.001	Anthony and Rosemary Gear	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support	This will enhance the biodiversity of the region and afford important recreational facilities for the population of Palmerston North.	We support the proposed protection of the gully network G1-G18 Map 7A.3E in the Aokautere/Summerhill region, by rezoning to Conservation and Amenity Zone.	Accept
S39.002	Anthony and Rosemary Gear	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	<p>In 1996 Graeme McIndoe Architect recommended the Parklands area (the area between Summerhill and Moonshine Valley, including Woodgate) be zoned for large residential areas to act as a transition area between small residential sections and larger rural residential sections and this has since been incorporated into the District Plan for Moonshine Valley and Polson Hill.</p> <p>For reasons we do not understand this plan for the same area has been dropped completely although the same issues remain. We can only suggest this is because Government have issued a requirement that Councils provide more housing due to the Housing crisis and advocated intensification of houses. However they also advocated that these developments are situated near to, and in, city centres. They did not advocate putting them out in an area with many challenges, not only topographical but also logistical. In addition Government did not include Palmerston North in their directive of multi-unit dwellings. Why would PNCC decide this multi-unit three storey design should be developed so far from the city centre and the amenities there, when they have not advocated this plan anywhere else within the Palmerston North area even though there are many far better areas suited to this?</p>	<ol style="list-style-type: none"> 1. We deplore the proposed rezoning of the flat land between these gullies, D1-D5 Map 7A.3E. Maintain the rural-residential zoning for the promontories D1-5 with minimum section size of 1 hectare. 2. Setback rule of 15 metres from the boundary adjacent to the slopes. 3. We have repeatedly asked for a transition area for the plateaux between the gully system in the Aokautere/Summerhil area and above the Moonshine Valley area. 4. Map 7A.4 A minimum 1ha subdivision zoning to connect the small residential sections in Woodgate and along Johnston Drive to the Rural Residential area of Moonshine Valley would solve all the problems of both Visual Impact and storm water discharge. 	Reject

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S39.003	Anthony and Rosemary Gear	Structure Plan: Map 7A.4D Street type Maps	Oppose	Traffic. This issue has not been taken seriously. The answer is consistently "buses". Between 8am and 9am the volume of traffic feeding from Turitea Road, Old West Road, Ruapehu Drive, Pacific Drive, Johnston Drive, Moonshine Valley Road, Polson Drive and all the other minor roads comes together on Summerhill Drive and then over the bridge into town. To add another one thousand plus dwellings to this area will produce a snarl up worthy of Auckland. Hardly anyone in the whole Aokautere/ Summerhill area will not be affected and however many buses are supplied they will not reduce the traffic issue. People do not wish to walk 500m to 1km to catch a bus. No bus will travel up to the promontory clusters of dwellings above Moonshine Valley. The narrow shared Local Streets and dead ends are not easy for a bus and the volume of passengers will not be economically viable.	We oppose those provisions which adversely impact traffic.	Accept in part	
FS18.041	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.	Accept in part	That the submission is accepted	Accept in part
S39.004	Anthony and Rosemary Gear	Structure Plan: Map 7A.4	Oppose	Map 7A.4 Promontory Clusters D1-D4. Almost every house in Moonshine Valley and a number on Polson Hill will be impacted by the row of multi-unit and three storey dwellings all along the brow of the hills. The plan allows for groups of small sections lining the narrow Shared Local Streets connecting these developments with the wider Aokautere/ Summerhill roading network. Council argue that the trees on the hills will mitigate against the visual impact but not all the hills have trees and a	1. A setback of 15m for all buildings from the edge of the hills with a height restriction of no more than two storeys. Map 7A.4 Promontory Clusters D1-D5. The 15m setback is a requirement for all dwellings overlooking Turitea Valley but so far has been denied for Moonshine Valley. The 15m setback and restriction of height to two storeys would help with the visual impact on Moonshine Valley.	Accept in part	

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				<p>lot are pines and eucalypts which can, and will, be felled in time.</p> <p>The three storey idea of the new dwellings is so that residents in these dwellings can have a view over the trees. Vision works both ways. They will be just as visible from the houses they overlook. The report also suggests that three storeys is necessary for the residents to see into the gullies and over the native trees that have yet to be planted. Native trees take at least 50 years to grow to anywhere near the height that would necessitate this and by then all these dwellings will have reached their use-by date. Where has the PNCC Design Principal in the District Plan gone where "Visual dominance from multi-unit development on neighbouring development is avoided"?</p> <p>Turitea Valley has not been identified as "Special Character" so why can they have this setback protection and we cannot? What is the reason Moonshine Valley is treated so differently and so detrimentally? It is not an equal playing field.</p>	<p>2. We have repeatedly asked for a transition area for the plateaux between the gully system in the Aokautere/Summerhil area and above the Moonshine Valley area. Map 7A.4 A minimum 1ha subdivision zoning to connect the small residential sections in Woodgate and along Johnston Drive to the Rural Residential area of Moonshine Valley would solve all the problems of visual impact [and storm water discharge].</p>	
S39.005	Anthony and Rosemary Gear	Structure Plan: Map 7A.4	Oppose	<p>Council up to now have used the gully system in the Aokautere/Summerhill area to remove storm water from all the developments. With the climate challenges we now face this method is utterly unacceptable. We work in the Green Corridors gullies every day and have watched the water pouring off the existing developments into the gully system with detrimental effect.</p> <p>Adderstone Reserve drains the sections on one side of the Pacific Drive area, mostly through drains opening both on the sides of the gully and at the base. In all cases the water is now gauging deep ruts and the force of the water is destroying the vegetation, including uprooting well established kahikatea, a tree used to sitting in wet</p>	<p>1. A setback of 15m for all buildings from the edge of the hills with a height restriction of no more than two storeys. Map 7A.4 Promontory Clusters D1-D5. The 15m setback and restriction of height to two storeys would help to a limited extent ...[to] reduce the damage the extra storm water will cause to the already unstable slopes.</p> <p>2. We have repeatedly asked for a transition area for the plateaux between the gully system in the Aokautere/Summerhil area and above the Moonshine Valley area. Map 7A.4 A minimum 1ha</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				soil. In Upper Titoki the water off the top Cashmere Drive houses is pouring down the slopes into the water system at the base. In the last few weeks the watercourse has blown out in places where, in early winter, we could step across but now is so wide and deep we cannot cross without climbing down into the base and pulling ourselves up the crumbling bank the other side. The sides of the stream are falling into the water all along the course, taking plants with it, and this is getting worse with each rain event. The Moonshine Reserve has gone beyond this. Water off the subdivision at the head of the feeding gully (Brian Green Development) (G3 Map7A.4) has scoured out the base of this little reserve and changed the meandering and narrow stream into a water course that completely precludes any means to walk up this reserve. The whole base of this gully is now the water course and deep. The paper walking track PNCC proposed for this area can now never be built. The subdivision above this reserve (Brian Green Development) had a sediment pond to control the volume of water at any one time and take out the silt but neither had any effect. These two examples should be listened to by PNCC as our weather events are getting worse.	subdivision zoning to connect the small residential sections in Woodgate and along Johnston Drive to the Rural Residential area of Moonshine Valley would solve all the problems of ...storm water discharge.		
S39.006	Anthony and Rosemary Gear	General - Stormwater, erosion and flooding	Oppose	A further concern for PNCC should be the damage to Bryant's Bridge on Aokautere Drive. Increased volume of water flowing down Moonshine Valley Stream and the water coming off the Woodgate subdivision into the Church gully (G1 Map7A.4) meet below this bridge and the force of this combined water is eroding the banks. The bridge was repaired some years ago but the road surface is starting to sag again.	Oppose those provisions which adversely impact stormwater.		Accept in part
FS18.018	Heritage Estates 2000 Ltd		Support	This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on	Accept in part	That the submission is accepted	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>		
S39.007	Anthony and Rosemary Gear	General - Stormwater, erosion and flooding	Oppose	<p>The Aokautere Urban Growth proposal plans to continue to use the same method as before to remove the storm water from the plateaux above Moonshine Valley. The water will be discharged in controlled fashion using Detention ponds sited at intervals along the top of the slopes and water will flow in a uniform way into the gullies and into Moonshine Valley. In addition the plan is for a setback of dwellings of 5m from the edge of the slopes.</p> <p>Both these mitigations are badly flawed. The reduction in soil infiltration from the concentration of multi-unit dwellings and the servicing roads is considerable. Water soaking into the 5m setback will saturate these areas in no time and have the potential to make the instability of all the slopes actually worse. All the slopes are already slip prone. Some are historical slips and some current ones and if lessons are learnt from the August 2022 Tasman disaster it is obvious planning should at all costs avoid aggravating unstable areas. A Detention facility is a good system for many areas. They reduce sudden volumes of water pouring out of areas and although they require a high standard of maintenance they are a good system to use. However, having them on these plateaux is extremely unwise. They will reach capacity by mid winter and thereafter water flowing into them will have to go somewhere. With limited wetland,</p>	<ol style="list-style-type: none"> 1. A setback of 15m for all buildings from the edge of the hills with a height restriction of no more than two storeys. Map 7A.4 Promontory Clusters D1-D5. The 15m setback would help ... to a limited extent ...reduce the damage the extra storm water will cause to the already unstable slopes. 2. We have repeatedly asked for a transition area for the plateaux between the gully system in the Aokautere/Summerhil area and above the Moonshine Valley area. Map 7A.4 A minimum 1ha subdivision zoning to connect the small residential sections in Woodgate and along Johnston Drive to the Rural Residential area of Moonshine Valley would solve all the problems of ...storm water discharge. 3. Warnings are everywhere that climate change has arrived and poses a huge challenge for our country. New Zealand has just experienced the warmest and wettest winter on record and there are examples throughout New Zealand where rain events have caused inestimable damage to 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>excess water will flow straight down the slopes.</p> <p>Two weeks ago we had 62mm of rain in 8 hours and if that is concentrated in either a Detention facility or a Retention pond and it is already full, the damage of this water pouring down any slope in our area will be huge.</p> <p>In addition we are liable to small and/or potentially destructive earthquakes. A fracture in the wall of any facility or pond will be very damaging to any gully, structure or property below them.</p> <p>GHD Ltd have been observing our issues with storm water damage in Moonshine Valley and have concluded in their report that the damage we are concerned about from this intensive development is "perceived" (page 37). This is an insult to every resident in the Valley. Our concerns are based on very real fact. We have never seen them observing when the stream has been in flood. Rather, their visits seem to have been when the flow is low. They appear to dismiss the damage as "historical" and therefore of no relevance. That is utterly unacceptable. Council by their own rules cannot allow damage to neighbouring properties from subdivisions. They have totally ignored this rule up to now and we can only assume this behaviour will continue.</p> <p>The Moonshine Valley Stream has already been considerably damaged by the increased generation of storm water draining from the Brian Green subdivision at the head of the gully connecting to Moonshine Reserve, as well as the Woodgate subdivision above the gully draining into the Community Church grounds in Moonshine Valley. Both gullies have been completely altered by the increased and unmanaged storm water and have been severely damaged. For Council to allow</p>	<p>infrastructure and the environment. The Manawatu will not avoid this for ever and Council needs to plan for that now.</p>	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				<p>more water to flow into these gullies, however good the mitigation, is totally iniquitous.</p> <p>The proposal to plant out these gullies with natives by Green Corridors and other groups is admirable but will not stop the damage to any of the gullies. Our hill, planted with natives over the last 35 years, demonstrates how water flowing down from above will undermine the roots of well established trees which then fall.</p>			
FS18.019	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	Accept in part	That the submission is accepted	Accept in part
S39.008	Anthony and Rosemary Gear	General - Stormwater, erosion and flooding	Neutral	<p>Moonshine Valley has been identified by PNCC as a "Special Character area" due to its two reserves, one of which has remnant and important original bush, the biodiversity of flora through the whole valley and the 21 native and endemic birds that have now made the Valley home. We also have a population of green geckos and the stream has important aquatic life with Giant Kokopu, both species of eels and other native life.</p> <p>The silt that comes down with the storm water results in totally opaque water and this flows into our stream. Moonshine Valley Stream has endangered Giant Kokopu and endangered long fin eels. Also short fin eels, koura, kakahi, shrimps, bullies.</p>	<p>If either Council really want to improve the health of the river they need to address the problem at the source...silt in the feeding streams largely caused by these intensive subdivisions.</p> <p>No one should want to leave a legacy of:</p> <ol style="list-style-type: none"> 1. Destroying the "Special Character" of Moonshine Valley. 2. Destroying the gully system by allowing intensive multi-unit dwellings above them. No amount of mitigation will control the damage caused by the extra storm water generated from the impermeable surfaces. 	Accept in part	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision		
				The silt settling after rain events is covering the entire bed of the stream and is causing untold damage to our aquatic life, something PNCC and Horizons are aware of but fail to act on. The Manawatu River has an unenviable reputation of poor water quality, in part due to the tributaries bringing in large amounts of silt.	<ol style="list-style-type: none"> 3. Destroying the health of the Moonshine Valley stream with the endangered species living in it. 4. Failing to act on improving the health of the Manawatu River by ignoring the cause of much of the damage coming down a silt laden tributary. 			
FS18.020	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	<table border="1"> <tr> <td>Accept in part</td> <td>That the submission is accepted</td> </tr> </table>	Accept in part	That the submission is accepted	Accept in part
Accept in part	That the submission is accepted							
S40.001	Heather and Grant Morgan	General - Traffic and transport	Not Stated	<p>With current building expansion in the new subdivisions of Johnston Drive, Pacific Drive area, traffic on Aokautere Drive and Summerhill Drive has increased significantly during peak hour traffic periods and around lunchtimes. New house residents cars are being added all the time as new builds continue in Vacluse Heights, Cashmere Drive and Woodgate Heights.</p> <p>It is increasingly difficult to get out from Ruapehu Drive and Summerhill Shopping Centre at times.</p> <p>We still only have one vehicle bridge crossing the Manawatu River at Fitzherbert. He Ara Kothai, the pedestrian and cyclists bridge that was recently built, did not include vehicle lanes. Traffic flows will increase on the Fitzherbert bridge with no alternative route for all the extra residential traffic.</p> <p>The only other vehicle crossing is near the Gorge</p>	[No specific relief sought]	Accept in part		

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				and Ashhurst. Too far away to be a variable alternative for additional traffic.		
S40.002	Heather and Grant Morgan	General - Multi-unit residential development	Not Stated	<p>Currently houses are being built on very small infill sections like the Japac development in Linton Street. Five houses were crammed onto a site that should not have had more than four houses. It starts to change the nature of the city too much. A key attraction of Palmerston North as a city to move to, from Auckland, was the lower density of houses.</p> <p>The reality of a multi-dwelling subdivision can be quite different in real life from its architect and artist's impression. Enough resident car parking is essential.</p>	<p>Sufficient off street parking needs to be allowed for each household unit.</p> <p>Purpose built parking needs to be allocated for visitors and extra family cars so front yards are not cluttered with cars.</p>	Accept in part
S40.003	Heather and Grant Morgan	General - Multi-unit residential development	Not Stated	<p>While the city does have a good number of parks and walking and cycling tracks, these will gain more users as more houses are built.</p> <p>The Silverbrooke development in Whitby, Porirua City is an example of multi-unit dwellings and standalone houses that looked good on paper. In reality the Parks are really parklets, appearing to be less than a quarter acre to support 38 or more households.</p> <p>The reality of a multi- dwelling subdivision can be quite different in real life from its architect and artist's impression. Green space is essential.</p>	Green space between units is critical, as are parks and playgrounds that can be used practically by more than one family at a time.	Accept
S41.001	Brett Guthrie	Whole of Plan Change	Support in part	<p>This submission supports the introduction of an integrated plan in principal. However, significant amendment is required, seeking greater consideration given to the special character of Moonshine Valley Rural Residential Area.</p> <p>Inconsistencies and contradictions between the District Plan, Plan Change G and the Aokautere Structure Plan are highlighted.</p>	This submission seeks that a broader view is taken with the proposed subdivision directly threatening the special character of Moonshine Valley Rural Residential Area. In particular the incongruous presence and close proximity of ill-placed multi-unit, multi-story housing.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>The submitter considers that overall the Masterplan 2022 has done little to allay the concerns of Moonshine Valley residents and again highlights substantial planning inconsistencies between developments and areas. In addition, the documents supporting the plan seem more a justification of the status quo than offering real solutions to these issues.</p>		
S41.002	Brett Guthrie	General - Multi-unit residential development	Oppose	<p>The submitter strongly objects to the extremely incongruous placement of multi- unit, multi-story housing of up to 11 metres on the promontories above Moonshine Valley. The National Policy Statement Urban Development (NPS-UD) is driving housing intensification, but no local precedent exists as there is no other outlying area of greenfield development in Palmerston North where this type of intensification is planned. There could not be a stronger disparity in development between these and Moonshine Valley. This issue was very clearly opposed in 2019, but has obviously been ignored since with astonishing hubris. Intensification legislation is, elsewhere, well described as "poor and rushed" ("Three Story Nightmare Delayed"; OneRoof News, 31 August 2022).</p> <p>In this location medium density multi-story adjoined buildings are in conflict with the aims of DP 7.2.3 (p.3); 7.3.1.3-5 (p.5); R7.6.2.1 Assessment Criteria a, b, c. (p.36); R7.15.2.1 (p70); 10.3 Objectives and Policies 2.2 (p.4); R10.6.3.1 Criteria h. (p.34); R10.6.3.2 Assessment Criteria f (p.36); Plan Change G, Landscape Assessment (PCG-LA); Village (p.10). In addition, these buildings and placement is in complete contrast with that consideration afforded the Hokowhitu Lagoon Residential Area (DP Map 10.6.3.3 (g) p.80) where "(v)isual dominance from multi unit development on neighbouring development is avoided." (DP 7.10.10, p.27). Overlooking Moonshine Valley,</p>	<p>This submission seeks that a broader view is taken with the proposed subdivision directly threatening the special character of Moonshine Valley Rural Residential Area. Exclude medium density multi-unit, multi-story housing from promontories.</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>multi-story and multi-unit dwellings do not fit "within the character of existing neighbourhoods." (DP 10.1 Introduction p.1), and certainly "may be less feasible than traditional detached dwellings." (PCG Section 10, Costs p.76).</p> <p>Moonshine Valley Rural Residential Area is identified as a special character area (DP 7.3.6 explanation p.19) and, as such, is afforded some protection in the NPS-UD from such ill-placed intensification.</p>			
FS17.001	Brett Guthrie		Support	<p>Submitter emphasises continued strong opposition to medium density, multi storey housing on the boundary with Moonshine Valley as outlined in Aokautere Plan Change-G: Promontory Clusters.</p> <p>Submitter provides further supporting information for their original submission that has arisen since their initial submission was made. This included assessment against criteria for medium-density, multi-storey housing</p>	Reject	Whole of submission allowed	Reject
FS15.001	Rosemary and Anthony Gear		Support	<p>Support for the removal of the proposed multi unit and multi storey dwellings. Allowing these will have a significant visual impact on Moonshine Valley. In addition this proposal above the escarpment along the Moonshine Valley boundary does not fit the new criteria for medium density development in town:</p> <ol style="list-style-type: none"> 1. Not within 800m of the city centre. Proposed dwellings are about 3.5km from city centre. 2. Not within easy walking distance of any future community centre due to the topography as well as distance. 3. No public schools exist or are planned within the 800m of these "fingers" on the plateau. 	Reject	The whole of the submission to be allowed	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>4. Insufficient room for a bus access and turning. Economic viability of public transport servicing questionable.</p> <p>Support for a 15m setback along the edge of the escarpment to reduce visual impact as well as reducing the danger from storm water causing slippage along the slopes.</p> <p>Proposed detention (or retention) ponds, will control the discharge of storm water into the gullies in a more controlled fashion, but will not reduce the volume of water requiring management. Reduced soakage area caused by increased footprints of houses and roading likely to increase water volumes requiring management. Submitter cites a precedent for the proposed setback as that overlooking Turitea Valley. Their slopes are not as unstable as Moonshine Valley's so it is even more important that this is put in place for the plateau above Moonshine Valley. Submitter supports a transition area between Woodgate and Moonshine Valley. This has been proposed many times in the past. Submitter supports the request that a minimum section size of 1ha be allowed for this area which not only would solve the problem of visual impact on the Moonshine Valley area but also alleviate the issue of drainage. The increased water runoff from the developments above Moonshine Valley have already increased sediment into the Moonshine Valley stream which is affecting our important aquatic life. i.e. Giant Kokopu and long fin eels. This sediment is getting worse and no mitigation by the developers seems to reduce it.</p>		
S41.003	Brett Guthrie	General - Multi-unit residential development	Oppose	A strong precedent for providing connectivity between residential and adjoining conservation area; the special character of Moonshine Valley Residential Area, and also avoiding visually intrusive buildings on the landscape is well provided for in DP 10; Resource Management	1. This submission seeks that a broader view is taken with the proposed subdivision directly threatening the special character of Moonshine Valley Rural Residential Area. In particular the incongruous	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>Issues; 10.2.12, Objective 7, Turitea Valley (p.6); and Objective 8, Napier Road (p.7); PCG-LCA (p.12). For example, although of quite similar landscape and development, Moonshine Valley is not afforded the same treatment for visual amenity as in Turitea Valley [submission cites DP 10.2.12, p. 3]</p> <p>The Moonshine Valley "interface" is not being carefully managed. The intrusion and visibility of these adjoined 11 metre buildings from and into Moonshine Valley is significantly downplayed by both the Structure Plan and the Landscape Assessment. For example, relating to Figure 5 (p.12), the Landscape Assessment relies heavily on the retention of a stand of pines that are due for felling and have been thinned since that image was taken. The years to replace these with similar or indigenous growth negate the validity of both this and the Structure Plans assessments completely. In this case local knowledge supersedes a brief site visit.</p> <p>The published recession planes hardly consider Moonshine Valley. The rear boundary recession planes are clearly inadequate and will perhaps be exacerbated with an "elevated outdoor area" (PCG-LCA 9.1 p.8). The submitter knows that their house and yard is easily viewed from the field above by a person standing there and looking through the pine trees. A multi-story building of 11 metres will magnify this view greatly, severely limiting the privacy presently enjoyed and creating a very unwelcome intrusion and loss of amenity.</p> <p>Significant setback and a transition area have been sought in submissions from Moonshine Valley residents' in 2009, 2014, 2015, 2018, 2019. Setback is now limited to a minimum of 5 metres merely because of geotechnical concerns (Tonkin</p>	<p>presence and close proximity of ill-placed multi-unit, multi-story housing.</p> <ol style="list-style-type: none"> 2. That the Plan change excludes medium density multi-storey housing from promontories. 3. Amendments are required to setback distance. Setback from the escarpment edge and a transition area need to be implemented to ensure the semi-rural skyline is retained, rather than having Moonshine Valley rural outlook adversely dominated by the visual prominence of housing and fencing (Section 32 PCG: 4.4 Community, 81, p.34, Table 7; PCG-LCA Development responses e. p.8). Precedent exists in the District Plan; Section 10, Objective 12 (p.3) and Map 10.6.1 (p.72); fence and building heights (Pacific Drive Extension R10.6.1.1 a. iii, iv & v, pp.12,13, I, p.19; Napier Road Residential Extension R10.6.1.4 d.ii, e.i, p.24), Policies 8.5 and 8.6 (pp.7,8) and the PCG 7.3 Objective 2, 3.4 Explanation (p.16). The proposed plan is in complete opposition to all of these. 	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>& Taylor, 2022). This minimal setback is very clearly inadequate when locating an array of 11 metre tall buildings close to the boundary with Moonshine Valley. It certainly will not "reduce(s) visual dominance", nor will these tall buildings visual impact be "mitigated by distance and existing vegetation" (Aokautere Structure Plan 2022 7.4, pp.5,6)</p> <p>In this location medium density multi-story adjoined buildings are in conflict with the aims of DP 7.2.3 (p.3); 7.3.1.3-5 (p.5); R7.6.2.1 Assessment Criteria a, b, c. (p.36); R7.15.2.1 (p70); 10.3 Objectives and Policies 2.2 (p.4); R10.6.3.1 Criteria h. (p.34); R10.6.3.2 Assessment Criteria f (p.36); Plan Change G, Landscape Assessment (PCG-LA); Village (p.10).</p> <p>In addition, these buildings and placement is in complete contrast with that consideration afforded the Hokowhitu Lagoon Residential Area (DP Map 10.6.3.3 (g) p.80) where "(v)isual dominance from multi unit development on neighbouring development is avoided." (DP 7.10.10, p.27).</p> <p>The Council is also obliged by the Resource Management Act 1991 (Principle 7.c) to maintain elements of the existing rural amenity such as a sense of spaciousness .</p>			
FS17.002	Brett Guthrie		Support	<p>Opposed to medium density, multi storey housing on the boundary with Moonshine Valley.</p> <p>Submitter provides further supporting information for their submission that has arisen since their initial submission was made.</p>	Reject	Whole of submission allowed	Reject
FS15.002	Rosemary and Anthony Gear		Support	<p>Submitter believes allowing these dwellings will have a significant visual impact on Moonshine Valley. Supports a 15m setback along the edge of</p>	Reject	The whole of the submission to be allowed	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>the escarpment to reduce visual impact.</p> <p>Submitter cites a precedent for the proposed setback as that overlooking Turitea Valley. Submitter supports a transition area between Woodgate and Moonshine Valley. Submitter supports the request that a minimum section size of 1ha be allowed for this area which would solve the problem of visual impact on the Moonshine Valley area.</p>		
S41.004	Brett Guthrie	General - Multi-unit residential development	Oppose	<p>Housing intensification and multi-unit, multi-story dwellings with limited on-street parking are obviously more suited to being in closer proximity to the central city (DP 10.3 Objectives and Policies 1.2 p.3) and "well served by public transport" (DP 10.3 Objectives and Policies 1.6 explanation p.4). The District Plan clearly supports the intention of the NPS-UD, however, the Aokautere Structure Plan (2022) does not.</p> <p>Encouraging this type of housing on the outskirts of the city and the fringes of limited public transport is also in conflict with the aim of limiting the effects of climate change by reducing travel (Eco-City Strategy 2021-31), and is counter to the intention of the NPS-UD.</p>	That the Plan change excludes medium density multi-storey housing from promontories.	Reject
FS17.003	Brett Guthrie		Support	<p>Submitter opposed to medium density, multi-storey housing on the boundary with Moonshine Valley.</p> <p>Submitter provides further supporting information for their submission that has arisen since their initial submission was made.</p>	Reject	Reject
FS15.003	Rosemary and Anthony Gear		Support	<p>Support for the removal of the proposed multi unit and multi storey dwellings.</p> <p>This proposal above the escarpment along the Moonshine Valley boundary does not fit the new criteria for medium density development in town:</p>	Reject	The whole of the submission to be allowed

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>1. Not within 800m of the city centre. Proposed dwellings are about 3.5km from city centre.</p> <p>2. Not within easy walking distance of any future community centre due to the topography as well as distance.</p> <p>3. No public schools exist or are planned within the 800m of these "fingers" on the plateau.</p> <p>4. Insufficient room for a bus access and turning. Economic viability of public transport servicing questionable.</p>		
S41.006	Brett Guthrie	Structure Plan: Map 7A.4	Oppose	<p>This submission supports the introduction of an integrated plan in principal. However, significant amendment is required, seeking greater consideration given to the special character of Moonshine Valley Rural Residential Area.</p> <p>The recommendation for a transition area "between the more intensive subdivision and development associated with the Aokautere residential area and the less intensive neighbouring rural area" was first mooted 26 years ago in the Aokautere Design Guide (1996) produced for the PNCC Strategic Planning Unit. While then specifically relating to nearby Parkland, a transition area is in the District Plan and includes Moonshine Valley and Polson Hill (Plan Change G (PCG), Amendments to the District Plan Part 1 and DP, 10.6.1, d.1. p.16). The contributing architect and urban designer to the 1996 guide has now abandoned the transition area recommendation in the Aokautere PNCC Structure Plan 2019, 2022 and the PCG 2022. The exact opposite is now planned for reasons unclear and unsupported.</p> <p>The Council is also obliged by the Resource Management Act 1991 (Principle 7.c) to maintain</p>	<ol style="list-style-type: none"> 1. This submission seeks application of a transition area adjacent to Moonshine Valley retaining some of the existing Rural-Residential overlay. This will ensure that the District Plan policy sympathetic to the semi-rural and unique character of Moonshine Valley is fully implemented (DP 7.3 Objective 3.6 p.19, 7.15.4 p.77). 2. The retention of a Rural-Residential overlay would provide a "clear gradation of development" avoiding the harsh abutment of the proposed smaller lots and multi-storied units with the Valleys 1.5 hectare minimum lot size (DP 10.6.1.1.d. p.16). 3. This submission seeks a similar "interface" as for Turitea Valley and eastern Pacific Heights (PCG Rural-residential p.11). 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				elements of the existing rural amenity such as a sense of spaciousness.		
S41.008	Brett Guthrie	General - Stormwater, erosion and flooding	Oppose	<p>The submitter has concerns about inadequate minimal setback, lack of transition area, inadequate measures to mitigate drainage issues.</p> <p>Setback greater than 5 metres, such as the 10 and 15 metres enforced on Pacific Drive Extension which overlooks Turitea Valley (DP Map 10.6.1 p.72), and a transition area would help mitigate the issues of stability and drainage with the known difficult soils and perched water tables found in this area (Urban Land Use Capability study, 1989; Tonkin & Taylor, 2005, 2022; expert evidence of soil scientist Dr. Alan Palmer, 2009; DP Section 22; Natural Hazards, and PCG, Section 7, Rural, 7).</p> <p>As noted in the PCG Stormwater Management Strategy the catchment for Mangaotane stream ("Bryant's Creek") includes a number of tributaries that arise in the areas being subdivided. It is now obvious that these streams and the culverts in Moonshine Valley are not able to sustain the increase in stormwater and storm surges from these subdivisions resulting in increased flooding and erosion. Most recently, for example, has been the closure of Tutukiwi Reserve due to erosion of the driveway. This area had been stable for decades.</p> <p>The comprehensive stormwater assessment by GHD (2022) is clearly designed to justify existing and planned mitigation and is in concert with the landscaping assessment. It does little to allay the concerns of Moonshine Valley residents nor to fulfill PGC Part 1, 7A, Objective 4.7 (p.5). The survey does not seem to have looked beyond the easily accessible parts of the various streams as indicated by the photographs. Stream damage</p>	<p>Submission seeks:</p> <ol style="list-style-type: none"> 1. amendments to setback distance and stormwater mitigation; 2. exclusion of medium density multi-storey housing from promontories; 3. inclusion of a 'Transition Area' adjacent to Moonshine Valley. 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>from at least one property was surveyed, but those issues were apparently not included in the final assessment. Instead of on-site observations, greater emphasis appears to have been placed on modeling.</p> <p>The submitter notes it is somewhat disingenuous to long-term Valley residents to describe the obvious impacts from the developments as "perceived" (GHD: Conclusions and recommendations p.37). Again local knowledge, observations and concerns must supersede a brief site visit in favourable conditions.</p> <p>The submitter notes Justice Gendall's reserved judgment (Pacific Farms Ltd. vs Palmerston North City Council 2010) with respect to inadequacies in the handling of stormwater flow from the Johnstone Gully area. In particular, the resource consent RM2111: "There was no mention of stormwater effects in relation to downstream landowners." These effects are now somewhat worse, residents' concerns are downplayed and appear not to have been inadequately dealt with in this assessment.</p>			
FS15.004	Rosemary and Anthony Gear		Support	<p>Submitters support for a 15m setback along the edge of the escarpment to reduce the danger from storm water causing slippage along the slopes. Submitter acknowledges proposed detention (or retention) ponds will control the discharge of storm water into the gullies in a more controlled fashion, but will not reduce the volume of water requiring management. Reduced soakage area caused by increased footprints of houses and roading likely to increase water volumes requiring management.</p> <p>Submitter supports the request that a minimum section size of 1ha be allowed for this area which would alleviate the issue of drainage. The increased water runoff from the developments</p>	Reject	The whole of the submission to be allowed	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				above Moonshine Valley have already increased sediment into the Moonshine Valley stream which is affecting our important aquatic life. i.e. Giant Kokopu and long fin eels. This sediment is getting worse and no mitigation by the developers seems to reduce it.			
FS18.021	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	Accept in part	That the submission is accepted	Accept in part
S42.001	Odine Johnstone	Whole of Plan Change	Neutral	Not in favour - down grade the area.	[No specific relief sought]	Reject	
S43.001	Chris Teo-Sherrell	General - Stormwater, erosion and flooding	Support in part	<p>There has long been concern expressed by the community and elected members about the increase in hard surface area in PN as a result [of] infilling and greenfield development. Some parts of the proposed plan seem to incorporate things like roadside stormwater treatment and detention gardens which I support.</p> <p>However, there needs to be more controls to limit the amount of hard surface area such as by using permeable concrete or other means to enable rainwater to enter the ground rather than run off it and to limit the portion of properties that can be covered in hard surfaces. It may even be that on-site rainwater detention features are required to attenuate peak stormwater flows.</p> <p>Additionally, stormwater has to be discharged somewhere and given that that is most likely to be</p>	I request the PNCC limit the amount of stormwater being generated from the area by: <ol style="list-style-type: none"> 1. Imposing requirements that limit the proportion of private properties that are covered by impermeable surfaces. It may even be that on-site rainwater detention features are required to attenuate peak stormwater flows. 2. Requiring rain gardens and similar features to the fullest extent possible to treat and attenuate stormwater flow from public areas. 3. Requiring detention ponds in the gullies to attenuate water flow and detain sediment. 	Accept	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				into the gullies and ultimately largely into the Moonshine Valley stream then adequate sediment detention and flow attenuation facilities should be incorporated into any design.		
S43.002	Chris Teo-Sherrell	Structure Plans (General)	Support in part	<p>I do not support the continued expansion of the built-up area of the city and think it would be better to create stronger incentives for intensification of use of the already built-up area. The demographic predictions for the city indicate that the number of households with children is not likely to greatly increase and there are plenty of existing houses and sections with adequate internal and external space for them. Instead we have numerous large houses occupied by one or two people. This is not good resource management.</p> <p>However, I recognise that, currently, it is difficult to prevent landowners from changing the use of their land and therefore it is better to have strong structure plans and requirements in place to control any change. In that regard, the Aokautere Urban Growth (Proposed Plan Change G) has considerable merit, incorporating a number of features that will result in greater diversity of housing stock on land that has comparatively low value for agricultural and horticultural purposes.</p>	I think it would be better to create stronger incentives for intensification of use of the already built-up area.	Accept in part
S43.003	Chris Teo-Sherrell	Structure Plans (General)	Oppose	Further development at Aokautere (Pacific Drive and environs) will exacerbate the car dependency of residents who live there because of the distance from most of the facilities in the city and the lack of really good public transport. This increased traffic will generate higher emissions of greenhouse gases (not just talking about exhaust pipe emissions here) and further degrade the livability of Palmerston North - both in conflict with the higher order goals for the city.	[No specific relief sought]	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S43.004	Chris Teo-Sherrell	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	<p>The distribution of recreational land: While there is naturally a wide distribution of conservation and amenity land (the gullies) in the area, the proposal does not include an adequate distribution of flat recreational areas where people might be able to play a wide array of small scale games. I am not talking here about full-sized pitches but areas where say 10 people might be able to kick a ball around. There is a sportsfield with space for full sized pitches at the bottom of Pacific Drive (although it needs drainage improvement to be truly useful).</p> <p>The only provision that has been made for such areas is the remnant of the flat part of Adderstone Reserve and the properties at 95 Pacific Drive and the areas in the middle of the medium density housing area. The first two of these are well down the hill at the north end of the area covered by the Structure Plan. The distance from there to the upper part of the area covered by the Plan is as much as 3km - too great a distance for most people to walk to and for younger (but independent) children, too far to cycle. The proposed flat recreational land within the medium density area will largely serve the needs of those living close by and is a good feature of the plan but is likely to be get a lot of use. Peace Tree Reserve at about 181 Pacific Drive has been developed in a way that precludes the sort of games I refer to.</p> <p>There is a need for at least one further small (single lot) flat recreational land area to be included somewhere a short distance upslope from the intersection of Pacific Drive and Atlantic Drive.</p>	I request that the PNCC include in the Structure Plan at least one additional small, flat recreational reserve towards the upper end of the Structure Plan area.	Accept
S43.005	Chris Teo-Sherrell	Structure Plan: Map 7A.4G Lot Pattern & Density (Adderstone)	Support in part	The distribution of commercial land (refer Map 7A.4G): Currently it is proposed to have a commercial centre adjacent to, or part of, the medium density housing area. If there is to be a	I request that the PNCC include in the Structure Plan provision for appropriate (quiet and clean) commercial activities at other locations within the area so that more	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
		Reserve Alternative)		<p>single such centre that is sensible.</p> <p>However, given the long narrow nature of the area covered by the Structure Plan this will still encourage a high level of car dependence for residents living beyond the medium density area. The distances to the centre from the peripheral parts of the area are too great for most people to consider walking or riding to, particularly if they have goods to carry.</p> <p>There need to be additional properties zoned to allow appropriate (quiet and clean) commercial activities at other locations to make the area truly amenable to active transport (destinations are needed not just footpaths).</p> <p>Having such small scale commercial activities permitted at certain locations would ease the creation of local businesses and help create a sense of community.</p>	<p>people can reach them by walking or riding. Again, a little upslope from the intersection of Pacific and Atlantic Drives would be one such suitable location but near other intersections would also be appropriate.</p>	
S43.006	Chris Teo-Sherrell	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	<p>The zoning of land on the Pacific Drive spur (refer Map 7A.4E and 7A.4G): It appears that land on the Pacific Drive spur as well as below the escarpment in the Turitea Valley at the southern end of the Proposed Plan Area is proposed to be zoned as rural residential.</p> <p>Given the presence of the Turitea Reservoir and Dam and the possibility of it being catastrophically damaged in an earthquake I agree that use of the land within the valley should be limited to low density. However, the land on the spur itself should be utilised more intensively in keeping with good resource management and I see no good reason for any of it to be zoned rural-residential.</p>	I request that the PNCC zone the area on the Pacific Drive spur, at the most upslope end of the Structure Plan area as Residential not Rural Residential while keeping that in the Turitea Valley as Rural Residential.	Reject
S43.007	Chris Teo-Sherrell	Structure Plan: Map 7A.4C	Oppose	The design of the local commercial centre (refer Map 7A.4C): The proposed layout is much too car-	I request that the PNCC change the design of the local commercial centre to as to create a	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
		Aokautere Neighbourhood Centre - Precinct Plan		<p>dominated with parking being prioritised over creating a 'village square' which would have so many benefits especially in close proximity to the medium density housing area.</p> <p>Relatedly, it seems inappropriate to me that the street leading towards the local commercial centre from the east is marked 'A' in map 7A.4C, indicating that it is an urban connector. In fact it wouldn't connect. It doesn't make sense to funnel vehicles through the local commercial centre (haven't we learned anything from the larger Square in the city centre?).</p>	<p>'village square' without any motorised through traffic or motor vehicle parking within it. Parking should, in my view, be limited to the local street (marked B on Map 7A.4C) and to the activity streets marked A and B on Map 7A.4D (Street Types Map).</p> <p>The area marked 'C' on Map 7A.4D should be off limits to motor vehicles (with provision for mobility parking in the first available positions outside this area. Access for delivery of goods would still be convenient even if not necessarily right outside the door of all of the shops.</p> <p>If the area between the shops is made into a 'village square', without vehicle access as described above, then there is no need for the street marked 'A' to be an urban connector.</p>		
FS18.037	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.	Reject	That the submission is accepted	Reject
S43.008	Chris Teo-Sherrell	Structure Plan: Map 7A.4D Street type Maps	Oppose	It seems inappropriate to me that the street leading towards the local commercial centre from the east is marked 'A' in map 7A.4C, indicating that it is an urban connector. If the area between the shops is made into a 'village square', without vehicle access [see submission point 43.007], then there is no need for the street marked 'A' to be an urban connector. In fact it wouldn't connect. It doesn't make sense to funnel vehicles through the	<p>I request that the PNCC change the status of the road marked 'A' in map 7A.4C from Urban Connector to Local and redesign to accordingly. Even if are vehicles are allowed to pass through the local commercial centre, the approach roads should not be considered as urban connectors but as local access streets and designed to keep speeds down to</p>	Reject	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>local commercial centre (haven't we learned anything from the larger Square in the city centre?).</p> <p>I generally agree with the proposed hierarchy of streets with the exception of the access to the local commercial centre (marked 'A' in map 7A.4C but jut coloured blue in map 7A.4D and not lettered there).</p> <p>I think this is inappropriate and unnecessary. There is an urban connector (marked blue F) a short distance away linking to Pacific Drive and it is poor design to send signals inviting vehicle traffic to travel through the local commercial centre.</p>	30km/h and to be shared by people on wheels.	
S43.009	Chris Teo-Sherrell	Structure Plan: 7A.4D 1 -17 Street Cross Sections	Neutral	<p>The design of the streets (refer Map 7A.4D and Street Cross Sections 7A.3D 1-17): On the street designs generally, I believe that the urban connectors have been designed for a speed of 50km/h which is now recognised as inappropriate both from a safety perspective, a health perspective (higher emissions of particulates and NOx) and a major discourager of cycling. These should be designed with speed limits of no more than 40km/h and a carriageway intended for motor vehicles of no more than 6m.</p> <p>The local streets should all have, and be designed for, speed limits of 30km/h or lower.</p> <p>The activity streets A and B should have, and be designed for, speed limits of 10km/h as there are likely to be higher numbers of pedestrians in the vicinity of the local commercial centre.</p>	<p>I request that the PNCC:</p> <ol style="list-style-type: none"> 1. set speed limits of no more than 40km/h on Urban Connector roads; 2. no more than 30km/h on Local Roads; and 3. no more than 10km/h on Activity Streets throughout the Structure Plan area and design the streets to match those limits. 	Reject
S43.010	Chris Teo-Sherrell	Structure Plan: 7A.4D 1 -17 Street Cross Sections	Oppose	<p>In several of the street cross sections, it is indicated that shared paths are incorporated. This is poor practice that deters walking because of the</p>	<p>I request that the PNCC replace all shared paths with separated footpaths and cycle lanes/paths. Footpaths should be included and be for the</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				excessive speeds that too many cyclists and riders of micro-mobility devices travel at.	sole use of people on foot or using mobility devices such as wheelchairs. The streets should be designed and speeds managed to provide safe passage for riders on the roadway, or separated from the roadway but separate from footpaths.		
FS18.038	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.	Reject	That the submission is accepted	Reject
S43.011	Chris Teo-Sherrell	Structure Plan: 7A.4D 1 -17 Street Cross Sections	Neutral	The Urban Connector A design (p6 of 26 in Appendix 3) is mostly good but a) the footpaths are of insufficient width (should be a minimum 1.8m); b) the cycle lanes are of insufficient width and have no buffer between the lane and parked cars. Both should be made 2m wide with an additional 0.5 as a buffer adjacent to the car parking. These changes would require 1.3 m to be removed from the carriage way and parking. 2m is ample for parking while a carriageway of 6.3m would still be possible. This would help to drivers to comply with a 40km/h speed limit.	I ask that the PNCC: <ol style="list-style-type: none"> adjust the cross section designs of the urban connector streets to increase footpath width to a minimum of 1.8m; cycle lanes to 2.0m plus a buffer where adjacent to parking; and decrease the carriageway allocation to motor vehicles to no more than 6.3m. 	Accept in part	
S43.012	Chris Teo-Sherrell	Structure Plan: 7A.4D 1 -17 Street Cross Sections	Oppose	The Urban Connector A design (p6 of 26 in Appendix 3) is mostly good but a) the footpaths are of insufficient width (should be a minimum 1.8m); b) the cycle lanes are of insufficient width and have no buffer between the lane and parked cars. Both should be made 2m wide with an additional 0.5 as a buffer adjacent to the car parking. These changes would require 1.3 m to be removed from the carriage way and parking. 2m is ample for parking while a carriageway of 6.3m	Similar comments could be made about the other cross sections but instead of going through them all I ask you to adjust them so that: <ol style="list-style-type: none"> speed limits are 30km/h or less on all local streets, 40km/h or less on all the urban connector streets and 10km/h on the activity streets and 	Reject	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				would still be possible. This would help to drivers to comply with a 40km/h speed limit.	<p>designed to help drivers comply with those limits;</p> <p>2. that where speed limits are 30k/h or less that riders of bikes and micromobility devices are required to ride on the carriageway and that the carriageway surface texture is such as to be suitable for small wheeled vehicles (i.e. fine chip or asphaltic concrete);</p> <p>3. that in all cases, separate provision is made for pedestrians and people dependent on mobility devices with high quality footpaths of no less than 1.8m width (i.e. no shared paths - they don't work for pedestrians).</p>		
FS18.039	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.	Reject	That the submission is accepted	Reject
S43.013	Chris Teo-Sherrell	Structure Plan: 7A.4D 1 -17 Street Cross Sections	Support	Residential design controls: I noticed in the Urban Connector E diagram that front fences are to be restricted to 800mm and dwellings must be set back 6m from the front boundary. I support the former for the positive effects it has on visual surveillance and connectivity between dwellings and the road. And it just makes it look and feel so much better - one only has to compare Rosalie Terrace with Pacific Drive to see the value of lower fences. It also makes it safer for people using footpaths.	I request that the PNCC require the tops of front fences to be no more than 800mm above the ground.	Reject	
S43.014	Chris Teo-Sherrell	Structure Plan: 7A.4D 1 -17	Oppose	Residential design controls: I noticed in the Urban Connector E diagram that front fences are to be restricted to 800mm and dwellings must be set	I request that the PNCC:	Accept in part	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
		Street Cross Sections		<p>back 6m from the front boundary.</p> <p>I do not support the latter except for garages. I think the front of houses, excepting garages should be able to, but not required to, be built within 3m of the front boundary to increase the amount of private space people have at the rear of their properties as well as to increase the connectivity between dwellings and the street.</p> <p>However, it is really important that the front of garages are set back at least 7m from the front property boundary to avoid visual dominance of the streetscape by the garages and avoid the situation where cars parked on driveways overhang the property and obstruct the footpaths -something that is very common in areas where such controls don't exist.</p>	<ol style="list-style-type: none"> 1. Allow the non-garage part of dwellings to be built up to 3m from the front boundary. 2. Require the front of garages to be no closer than 7m from the front boundary of the property. 		
FS18.040	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.	Accept in part	That the submission is accepted	Accept in part
S43.015	Chris Teo-Sherrell	Structure Plan: Map 7A.4D Street type Maps	Oppose	Public transit routes: Map 7A.4D suggests that public transit is only provided for along Aokautere Drive. Surely this must be an error. If the plan is to contribute at all towards the City's greenhouse gas emissions goals and to create a neighbourhood that isn't car dependent in the way most others in the city are, then there must be public transport provided to the area.	<p>I request that the PNCC ensure that provision is made for public transport routes (including the location of shelters so that there aren't obstacles to installing them) through the Structure Plan area.</p> <p>There is an obvious route using Johnstone Drive to leave Aokautere Drive then following the urban connector streets upslope to the top of the area covered by the plan and then returning via Pacific Drive to rejoin Aokautere Drive, or occasionally, as an</p>	Accept in part	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					alternative, via Valley Views and Turitea Roads. The route does not need to, and should not, go through the local commercial centre but can go close by it on the route described.	
S43.016	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Support in part	Pg 2: The first bullet point concerning turning right from SH57 Old West Road/Aokautere Drive intersection: It is also hazardous turning right from Summerhill Drive (where it meets Aokautere Drive) into Old West Road.	I seek PNCC to simultaneously address the hazards connected with turning right out of Old West Road into Aokautere Drive and the turning right out of Summerhill Drive into Old West Road. It is also hazardous turning right from Summerhill Drive (where it meets Aokautere Drive) into Old West Road. This aspect should also be dealt with. There appears to be room for a roundabout there that would deal with both this and the issue of turning right from Old West Road into Aokautere Drive. With increased traffic arising from Valley Views Road and other development in the Turitea Valley both turning difficulties should be addressed at once.	Accept
S43.017	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Support in part	Pg 2: The second bullet point concerning the SH57 Aokautere Drive/Pacific Drive intersection:	I seek PNCC to simultaneously address the hazards connected with the intersections of Pacific Drive/Aokautere Drive and Ruapehu Drive/Aokautere Drive. This should be addressed in concert with the Ruapehu Drive/Aokautere Drive intersection especially as this latter intersection is closer to the desire line for pedestrians going between IPU and the shopping complex. Offset traffic lights would enable these intersections to be made much safer.	Accept
S43.018	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Support in part	Pg 2: The third and fourth bullet points concerning the intersection of Ruapehu Drive and Summerhill Drive (the hill section): The recommendation about maintaining a right turn out of Mountain View Road while only	I seek PNCC to signalise the intersection of Ruapehu Drive and Summerhill Drive to address the safety issues for motorists, cyclists and pedestrians. A signalised intersection would provide for motor vehicle access and egress from	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				allowing left turn out of Ruapehu seems confused. Combined with the need to provide access for cyclists (heading towards the river) and pedestrians (heading both towards and away from the river), a signalised intersection would be safest. It would also help to decrease speeds on the Summerhill Drive hill, something that will be needed even more than it is now if traffic volumes increase as a result of Plan Change G. Providing two way cycle flows on the east side of Summerhill Drive will create problems for cyclists on Fitzherbert Bridge (unless that is also widened). It also wouldn't provide for pedestrians. It makes most sense to get both pedestrians and cyclists to the west side of Summerhill Drive. An fully accessible underpass would be difficult to install to enable this.	Ruapehu Drive in both directions, access to and egress from Mountain View Road, and would be the safest way to provide for pedestrians and cyclists. It would also avoid motor vehicles having to travel additional distance to make use of a roundabout at Williams Tce.	
S43.019	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Not Stated	My comments refer to the recommendations made on p2 of the Summary of Technical Reports - the fifth bullet point concerning the safety of an unidentified intersection: - it is unclear which intersection is being referred to by this point.	I seek PNCC to clarify which intersection is being referred to and allow for additional comments in light of the clarification.	Reject
S43.020	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Support in part	Pg 2: The seventh bullet point concerning the intersections of Abby Road and Johnstone Drive with Pacific Drive: I support control of these intersections, preferably by means of roundabouts (given the residential nature of the area).	I seek PNCC to control traffic at the intersections of Abby Road and Pacific Drive, and Johnstone Drive and Pacific Drive, by means of best design roundabouts that provide for pedestrians and cyclists as well as motor vehicles. I suggest they would be assisted in providing safe access for all road users if coupled with lowering the speed limit on Pacific, Johnstone and Abby.	Accept in part
S43.021	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Oppose	Pg 2: The eighth bullet point concerning a shared path on the south side of Aokautere Drive and a pedestrian crossing facility: - I oppose the use of a shared path because they provide inferior experience for pedestrians, especially when used by riders travelling fast as is likely to be the case here.	I seek PNCC to ensure separate paths are provided for pedestrians and cyclists and provide adequate measures to ensure safe crossing of Aokautere Drive for them. Separated paths should be provided with access through to Adderstone Reserve and any housing built on part of the current	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				I agree there is need for a safe means for pedestrians and cyclists to cross Aokautere Drive in the vicinity of Adderstone Reserve but dropped kerbs and a median island are unlikely to provide an adequate level of safety unless measures are taken to lower speeds on Aokautere Drive.	reserve that is proposed for redesignation as residential land. The whole length of Aokautere Drive from Summerhill Drive to Johnstone Drive should be seen as an urban road with high levels of development on both sides and so the speed limit should be set accordingly. Safety is more important than travel time savings. A raised crossing point would help lower speeds and increase safety, perhaps with an on-demand signalised crossing point.	
S43.022	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Support in part	Pg 2: The ninth bullet point concerning bus services: - I support the introduction of high frequency bus services to serve the Plan Change area but it needs to be introduced ahead of further development so that people can choose to use it right from the time they move into the area when new habits are most easily formed. This will help achieve higher patronage and decrease private motor vehicle traffic.	I seek PNCC to advocate to MWRC to establish a high frequency bus service to the area before further development takes place.	Accept
S43.023	Chris Teo-Sherrell	Section 32 Report - Appendix 15: Technical Report Summary	Support	Pg 2: The tenth point concerning facilitating cycling between the plan change area and the rest of the city - I support this. Creating and maintaining an unobstructed cycleway from Johnstone Drive to the Fitzherbert Bridge would be a good start instead of what exists currently which is often blocked by parked cars, forcing cyclists out into the motor vehicle lane.	I seek PNCC to declare a special vehicle lane for cyclists and micromobility users from the Johnstone Drive/Aokature Drive intersection to the Fitzherebert Bridge.	Reject
S44.001	Sonya Park	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	The Tutukiwi Reserve stream runs adjacent to my property border and in periods of moderate to heavy rainfalls, the water has increased from a 3-metre stream into a 20-metre torrent and has at times, submerged the whole corner of the Tutukiwi Reserve bordering my fence line. In these instances, the 3-metre stream becomes a 50-meter flood plain. On 23rd August 2022, the Tutukiwi Reserve car	I wish to have amended the D1-D5 multi-unit housing proposal. I suggest moving the D1-D5 Multi Unit Housing sites further away from the gullies that feed the Tutukiwi Reserve stream, Aokautere Church stream and the Moonshine Valley Reserve stream.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>park was fully underwater after one night of heavy rain and the Tutukiwi Reserve stream does flood regularly after only moderate rainfall.</p> <p>The proposed D1-D5 Multi unit dwellings are positioned on the borders of gullies that flow water into the Aokautere Church stream, the Moonshine Valley Reserve stream and the Tutukiwi Reserve stream.</p> <p>The Adderstone Reserve public walkway is already showing signs of erosion, making it dangerous for the public to enjoy this communal area.</p> <p>The walking planks over the stream in Hokonui Heights have been washed away in the recent rain events due to the increasing rainfalls we are experiencing.</p> <p>Before any proposed development has begun, the gully's surrounding Moonshine Valley and the streams within the valley are having to cope with naturally increasing rainfalls.</p> <p>Stormwater runoff after the proposed development will exacerbate the erosion and the demands of the streams and gullies will worsen due to this proposal diverting storm water into the Moonshine Valley catchment area.</p> <p>First photo [attached - floodpic1] taken August 2020, showing Tutukiwi stream flooding across Tutukiwi reserve and lapping at my boundary fence.</p> <p>Second photo [attached - floodpic2] is the Tutukiwi carpark under water, taken on the 23rd August 2022, after one night's rain.</p>			
FS18.042	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The	Accept	That the submission is accepted	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.			
S45.001	PN Industrial and Residential Developments Ltd	Whole of Plan Change	Support in part	<p>We support the overall intent of Plan Change G, which seeks to release immediate housing supply in a way which creates a vibrant, well-connected community that is sensitive to the unique Aokautere landscape.</p> <p>The submitter is in general support of the imposition of the Structure Plan for the area, and minor amendments to current zoning provisions.</p>	There are aspects of PPC:G where relief is sought. [See additional submission points]	Accept	
FS18.001	Heritage Estates 2000 Ltd		Support in part	The submitter supports the intent of the PC-G to release a supply of housing, but not that it is an immediate supply. The submitter opposes the the imposition of the Structure Plan for the areas as it embeds an urban design-led outcome that is likely to require revisiting during the life of the plan. There is benefit to the city in enabling developer-led and/or private-public partnerships for the supply of infrastructure inclusive of modification to Structure Plans to enable better outcomes.	Accept in part	That the PC-G enables modifications and alternatives to the Structure Plan notified for the area, through the wording of the plan where the alternatives and modifications demonstrate integrated infrastructure.	Accept in part
S45.002	PN Industrial and Residential Developments Ltd	Structure Plan: Map 7A.4A Street Hierarchy	Oppose	<p>Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose the configuration of the roading shown.</p> <p>We seek modification of the internal road layout - specifically to reconfigure the dog-leg within the proposed rural road, adjacent to the termination of Valley Views Road, and provide a straight alignment in this location. Our client has concerns regarding the safety of this alignment, considering</p>	We request modification to the scheme plan to amend the configuration of this road. Specifically to reconfigure the dog-leg within the proposed rural road, adjacent to the termination of Valley Views Road, and provide a straight alignment in this location.	Accept	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the road geometry in this location combined with the speed environment of rural roads.		
FS18.036	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.	Accept That the submission is accepted	Accept
S45.003	PN Industrial and Residential Developments Ltd	Structure Plans (General)	Oppose	Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose the configuration of the roading shown. It is unclear what the purpose of this boulevard is, particularly in this suburban low-density location.	We seek the 'boulevard' within the residentially zoned portion of the Green Block is removed, and replaced with a conventional local road cross section.	Reject
S45.004	PN Industrial and Residential Developments Ltd	Structure Plans (General)	Neutral	Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose both the timing of construction requirement, and the configuration of the roading shown.	Our client seeks the inclusion of a <i>notional</i> road connection to Turitea Road from the Green Block, rather than relying solely on a connection being provided by another landowner, from the southernmost block.	Reject
S45.005	PN Industrial and Residential Developments Ltd	Structure Plans (General)	Neutral	Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose both the timing of construction requirement, and the configuration of the roading shown. It is considered that the break in the Valley Views	It is sought this break in the road is removed, allowing for continued flow of traffic through the development area and avoidance of a lack of connectivity throughout. The scheme plan to be provided with the application to Council for "Stage 9" of the Valley Views subdivision is sought to be included within the Structure Plan (attached). It is further requested that the Structure Plan is amended in accordance with the	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				Road shown on the proposed Structure Plan is at odds with the environmental outcomes sought by the Plan Change, for connectivity and avoidance of long cul-de-sacs.	approved subdivision, being Stage 8 of Pacific Drive, with Council reference SUB 6267.		
S45.006	PN Industrial and Residential Developments Ltd	7A: Objective 5	Oppose	Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose the timing of construction requirement.	The submitter opposes the requirement for transport infrastructure to be completed prior to development, and the Non-Complying activity status proposed for applications which do not achieve this, as set out in Objective 5, Policy 5.10, R7A.5.2.2, and R10.6.5.6.		Accept in part
FS16.008	Waka Kotahi NZ Transport Agency		Oppose	<p>Removing the requirement for transport infrastructure to be completed prior to development, and the non-complying status proposed for applications is not supported.</p> <p>Should Plan Change G proceed it is essential that appropriate transport infrastructure is required to be provided prior to development. This will support a well-functioning urban environment, provision for active and public transport modes and the safety and efficiency of the transport system.</p>	Reject	Waka Kotahi seeks these submissions are disallowed.	Reject
S45.007	PN Industrial and Residential Developments Ltd	7A: Policy 5.10	Oppose	Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose the timing of construction requirement.	The submitter opposes the requirement for transport infrastructure to be completed prior to development, and the Non-Complying activity status proposed for applications which do not achieve this, as set out in Objective 5, Policy 5.10, R7A.5.2.2, and R10.6.5.6.		Accept
FS16.009	Waka Kotahi NZ Transport Agency		Oppose	<p>Removing the requirement for transport infrastructure to be completed prior to development, and the non-complying status proposed for applications is not supported.</p> <p>Should Plan Change G proceed it is essential that</p>	Reject	Waka Kotahi seeks these submissions are disallowed.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				appropriate transport infrastructure is required to be provided prior to development.		
S45.008	PN Industrial and Residential Developments Ltd	R7A.5.2.2	Oppose	Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose the timing of construction requirement.	The submitter opposes the requirement for transport infrastructure to be completed prior to development, and the Non-Complying activity status proposed for applications which do not achieve this, as set out in Objective 5, Policy 5.10, R7A.5.2.2, and R10.6.5.6.	Accept in part
FS16.0010	Waka Kotahi NZ Transport Agency		Neutral	Removing the requirement for transport infrastructure to be completed prior to development, and the non-complying status proposed for applications is not supported. Should Plan Change G proceed it is essential that appropriate transport infrastructure is required to be provided prior to development.	Reject Waka Kotahi seeks these submissions are disallowed	Reject
S45.009	PN Industrial and Residential Developments Ltd	R10.6.5.6	Oppose	Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose the timing of construction requirement.	The submitter opposes the requirement for transport infrastructure to be completed prior to development, and the Non-Complying activity status proposed for applications which do not achieve this, as set out in Objective 5, Policy 5.10, R7A.5.2.2, and R10.6.5.6.	Accept in part
S45.010	PN Industrial and Residential Developments Ltd	7A: Objective 6	Support in part	The submitter supports, in principle, the acquisition of gullies by PNCC for conservation and amenity purposes. However, PC:G requires that gullies are vested at the earliest subdivision opportunity, with little to no regard for how these will be accessed by Council for maintenance, enhancement, and installation of public access infrastructure.	It is sought that Objective 6 and Policy 6.6 be reworded to allow for gullies instead to be vested where they are contiguous to an area of land sought to be developed.	Accept
S45.011	PN Industrial and Residential Developments Ltd	7A: Policy 6.6	Support in part	The submitter supports, in principle, the acquisition of gullies by PNCC for conservation and amenity purposes. However, PC:G requires that gullies are vested at the earliest subdivision	It is sought that Objective 6 and Policy 6.6 be reworded to allow for gullies instead to be vested where they are contiguous to an area of land sought to be developed.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				opportunity, with little to no regard for how these will be accessed by Council for maintenance, enhancement, and installation of public access infrastructure.			
S45.012	PN Industrial and Residential Developments Ltd	Zoning Maps	Oppose	<p>The operative District Plan has a directive policy framework which seeks to avoid the creation of undersized rural land parcels such as those proposed, and affords a non-complying activity status to subdivisions of this nature. Further, the information requirements for subdivisions for undersized rural land parcels involve invasive soil investigations and extensive reporting which would not correspond with the scale of effects in this location.</p> <p>The absence of the word 'or' between the policy provisions of Policy 3.2, and non-complying activity status for subdivisions of this effect are considered to pose great risk to the resource consenting process and giving effect to the Structure Plan; particularly as PNCC have, on occasion, expressed apprehension around the precedence effect that may be created across the City should they approve subdivisions for rural land below 20ha.</p> <p>We reiterate that these rural areas should be included within the rural-residential overlay so as not to frustrate the resource consenting process, and to better reflect their location within a peri-urban environment.</p>	The submitter opposes the Rural Zoning of those eastern-and-westernmost portions of the Green Block and requests they be included within the Rural-Residential overlay also.	Accept in part	
FS18.013	Heritage Estates 2000 Ltd		Support	<p>The submitter opposes aspects of the zoning maps and seeks clarity for consenting on the rural overlay proposed as part of PC-G.</p> <p>That PCG enables modifications and alternatives to the Structure Plan (and therefore the zoning map) notified for the area, through the wording of</p>	Accept in part	That the submission is accepted	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the plan where the alternatives and modifications demonstrate integrated infrastructure for growth.		
S45.013	PN Industrial and Residential Developments Ltd	General - No specific provision referenced	Neutral	Although not expressly provided for in the Plan Change document, the submitter wishes to take this opportunity to note that they have made significant financial contribution to PNCC for safety upgrades to occur at the intersection between Turitea Road and Valley Views, which have not been provided by the Council.	The submitter seeks roading 'credits' be applied to their development when calculating development contributions payable.	Accept in part
S46.001	Michael Poulsen	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	<p>Overall agree with most conclusions in the GHD report except for the maximum rainfall rates being used as recent events would suggest they are too light even using the 1 in 100 year events.</p> <p>Being a farmer and fertiliser consultant with experience of the effects of management, inadequate infrastructure and climate on the physical soil environment, we need to protect our soils and soil biology and the linked water systems as much as we can.</p> <p>As alluded to in the report infiltration rates are not high on this soil type but still need to be allowed for.</p>	<p>With regards to the overall area there needs to [be] consideration of the ratio of unpaved area to paved with the need for the breakup and minimisation of large paved areas to avoid the ability of collection of large volumes of water turning into uncontrollable torrents.</p> <p>On a per house basis the ratio of paved to unpaved or permeable ground cover also needs to be considered together with the use of rainwater tanks and greywater systems all helping to improve the efficiency of our water demand and usage and or disposal. We need to protect our soils and soil biology and the linked water systems as much as we can. As alluded to in the report infiltration rates are not high on this soil type but still need to be allowed for.</p>	Accept
S47.001	Pasifika Reference Group	General - No specific provision referenced	Support in part	<p>As proposed, the PNCC are rezoning part of Aokautere to residential area from the current rural designation. This will bring more opportunities for our Pacific people to find access to other areas of Palmerston North to reside. This will also provide opportunities for work and schooling for their families in this new zoned area.</p> <p>Currently opportunities to live in new areas has not been an option as they are financially out of reach for many Pacific Families. Providing options for PNCC housing has also become difficult for</p>	<p>That the Council recognise the difficulty Pacific people experience in finding options for housing in newly developed areas and create equal/equitable opportunities for Pacific people to access these opportunities through:</p> <ol style="list-style-type: none"> 1. Building Council owned properties in these new areas that meet the needs of our Pacific families. 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>many Pacific Families as they find the application process difficult and/or the options for housing are in areas that are less desirable. Plus in some cases families have struggled to meet the criteria.</p> <p>As with all cultures, Pacific families have aspirations to live in a range of areas in the city and have access to all the beautiful reserves, and other amenities the city has to offer. We support this rezoning proposal as it creates more opportunities for our city.</p>	2. Providing assistance for Pacific families to apply for these properties in the way of interpreters, legal advice etc.	
S47.002	Pasifika Reference Group	Whole of Plan change - Adderstone Reserve option	Support in part	We think that the Adderstone Reserve has the potential for a purpose built Pacific Centre. Currently the Pasifika Community Centre is housed at Bill Brown Park which is too small and doesn't have the kitchen facilities to cater for the groups who use the centre. Adderstone Reserve could provide the opportunity to have purpose built facilities and also to create the opportunity for other businesses to be in close proximity to the centre. This would also create a multicultural hub in Aokautere with IPU being close by.	That the Council recognise the difficulty Pacific people experience in finding options for housing in newly developed areas and create equal/equitable opportunities for Pacific people to access these opportunities through rezoning Adderstone Reserve and looking at the feasibility of a new Pasifika Community Centre to be housed on that site.	Reject
S47.003	Pasifika Reference Group	Whole of Plan change - Adderstone Reserve option	Support in part	The key aspect for council to consider would be looking at reducing the barriers to property access for Pacific families. This would require thinking about ways to enable equitable access for Pacific families which could lead to home ownership, not just by increasing the housing stock but actively planning with the Pacific Community to explore that Pacific people can become homeowners in new residential areas.	That the Council recognise the difficulty Pacific people experience in finding options for housing in newly developed areas and create equal/equitable opportunities for Pacific people to access these opportunities through identifying an area which could be designated for a Pacific provider to develop housing which meets the needs of our Pacific community.	Reject
S48.001	Bruce and Marilyn Bulloch	Whole of Plan Change	Support	<p>In principle we support Plan Change G for the following reasons:</p> <ul style="list-style-type: none"> - Having a comprehensive plan is far more desirable than piecemeal development driven by individual developers who may be tempted by short-term expediencies. - Taking the gullies into Council ownership and 	That Plan Change G proceed through the consultation and hearing phases so that its provisions can be assessed in detail.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				managing them as a coherent system will enable them to be exploited as landscape features. - The range of documentation provided in support of the Plan Change indicates an overall vision, the foreseeing of many of the contingencies, and the District Planning Rules that desirable outcomes will entail.			
FS18.002	Heritage Estates 2000 Ltd		Oppose	<p>There is no notice of requirement (NOR) or other designation notified. The s32 at 10 (e) states: The vesting and rezoning of the gully network to the Conservation and Amenity zone which provides for their protection, maintenance, and enhancement. The boundary of the Conservation and Amenity zone presently aligns with the indicative 5m no build setback boundary adjacent to the gully edge, which will be confirmed on subdivision.</p> <p>The submitter is concerned that the planning approach advocated through the masterplan/structure plan seeks to rezone private land (limiting the use of the land for any other function), then appears to require enhancement to mitigate the effects of PCG and then requires that the landowner vest the land with Council for a public purpose at the earliest time in the subdivision process.</p>	Reject	That the submission is declined.	Reject
S49.001	Gill Welch	Whole of Plan Change	Oppose	<p>I wish to voice my objections and concerns regarding the proposals expected to take place alongside my property and others on Moonshine Valley Road.</p> <p>Firstly I would like to point out that I feel that these proposals appear to be somewhat hidden, from those of us who will feel most impact, due to the sheer length and complexity of the documents.</p>	I feel that the council should at the very least, hold a meeting for those of us to be directly impacted from these proposed changes, and in addition, also a site visit needs to be undertaken so that any of our very really concerns can be addressed and observed real time.		Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S49.002	Gill Welch	General - Multi-unit residential development	Oppose	<p>Moonshine has always had a special status as a lifestyle environment, and the council appear to have given zero consideration for this fact given that the council deems it appropriate to allow the construction of 11 meter high density flats along our border. The absurdity of this, choosing to place this type of housing next to idyllic lifestyles, almost beggars belief.</p> <p>This is the type of housing that is undoubtedly best suited to inner city developments and not on the fringes of town adjoining country properties. Development gone mad.</p> <p>The developer that owns this land, I know, would not like 11 meter 3 storey homes next to their lifestyle home and they have a choice not to destroy others peoples homes. Life isn't always about making money at the expense of others, just because the council may end up deeming that they can doesn't mean that they should.</p>	Please leave this type of housing where it belongs, and it certainly is not next to the peaceful setting of lifestyle properties. I cannot think of a more inappropriate place to build high density housing. Re-design in coordination/sympathy with views of affected Moonshine Valley residents.	Accept in part
S49.003	Gill Welch	General - Indigenous Biodiversity	Oppose	<p>There will be impact on the nature that the Moonshine residents have fought so hard to protect. Moonshine has made great strides to become predator free and to protect our bird life/wildlife. This development will bring the risk of more cats and escaped dogs endangering the nature that abounds.</p> <p>We all believed that because of the gully and the lay of the land, and the special status that Moonshine holds a subdivision such as this could not happen.</p>	Re-design in coordination/sympathy with views of affected Moonshine Valley residents.	Accept
S49.004	Gill Welch	General - Stormwater, erosion and flooding	Oppose	The gully that is on my neighbours property has already suffered substantial and sustained damage due to the subdivision already in place. My neighbours land is deteriorating due to the abnormal amount of water running off the subdivision and down the gully carving out	Re-design in coordination/sympathy with views of affected Moonshine Valley residents.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>massive erosions and bank collapses, and no one has shown any concern to the damage being caused to someone else's property. Other land on Moonshine is also suffering the same fate.</p> <p>I believed that the council had an obligation to ensure that no new subdivision should have a detrimental effect on an existing one, this certainly has not been adhered to concerning my neighbours property, and I see the same thing continuing with these council proposals.</p>			
FS18.022	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	Accept	That the submission is accepted	Accept
S49.005	Gill Welch	General - Stormwater, erosion and flooding	Oppose	<p>The proposals of ponds or some sort of stormwater retention on my border is of huge concern to us, given the damage explained and observed and "Ignored" in my previous paragraphs.</p> <p>We have zero faith that the excess water produced and also the diverted natural water course due to this development will have no impact on our land. The land that we own bounding the subdivision is bone dry throughout all seasons, it has always been this way. We fear this will not be the case with this intensive housing on our borders.</p> <p>We also have large trees growing on this land. If our land does not retain its status quo then these</p>	Redesign in coordination/sympathy with views of affected Moonshine valley residents.		Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				large trees will become at risk. New water running onto our land or soaking into it because of this intensive development will undermine the tree roots and will increase the likelihood of them falling.			
FS18.023	Heritage Estates 2000 Ltd		Support	This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents. The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.	Accept	That the submission is accepted	Accept
S49.006	Gill Welch	General - Multi-unit residential development	Oppose	We are also informed that these 3 storey intensive 11 meter high buildings will only have a 5 metre setback and not even the 15 metre setback as in the Turitea Valley subdivision. Why is this? The visual impact will destroy our Valley.	Re-design in coordination/sympathy with views of affected Moonshine Valley residents.		Accept
S50.001	Palmerston North City Council	General - No specific provision referenced	Support	Not all tracked changes shown on chapter contents pages.	That the contents pages for each District Plan chapter affected by Plan Change G be amended to show tracked changes where proposed changes are promoted.		Accept
S50.002	Palmerston North City Council	Map 10.1A	Support	Map 10.1A has poor resolution, which may make it difficult to interpret.	That an updated, higher resolution map be included. Amended Map 10.1A is attached as Appendix 1.		Accept
S50.003	Palmerston North City Council	Map 10.1A	Support	Map 10.1A uses a different map key from the definitions used in the proposed provisions. The key needs to include a notation to illustrate that classes A and B are 'developable' and classes C, D and E are 'limited developable'. This will ensure clear delineation of 'developable' and 'limited	Change key to define Classes A+B as "Developable Land" and Classes C, D and E as "Limited Developable Land" Amended Map 10.1A is attached as Appendix 1.		Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				developable' land for the purpose of the proposed provisions.		
S50.004	Palmerston North City Council	Structure Plans (General)	Support	<p>The key on the Aokautere Structure Plan creates confusion because it uses the label 'Aokautere Residential Area', and this is shown as being only the areas delineated in orange, when according to the proposed definition, it applies to the whole of the Greenfield Area.</p> <p>A change to the Definition for Aokautere in Section 3 is suggested so that it reads Aokautere Greenfield Residential Area. This would provide greater clarity to plan users and ensure that the different features within the Aokautere Structure Plan can be more easily delineated.</p> <p>The alignment of the Abby Road extension in the structure plans needs a minor adjustment to align with the Notice of Requirement for Abby Road.</p> <p>Map 7A.4D contains a minor error in the reference number for the Street Cross Sections, where it is recorded as 7A.3D 1-17 instead of 7A.4D 1-17.</p>	<p>That the Definition for Aokautere Residential Area be amended as follows: Aokautere Greenfield Residential Area means the Greenfield Residential Area shown in the Aokautere Structure Plan. That Map 7A.4D be amended so that the Street Cross Sections reference reads 7A.4D 1 -17 That the structure plan be amended to align the Abby Road extension with the Notice of Requirement for Abby Road. That any consequential amendments to the Structure Plan also be made.</p>	Accept in part
S50.005	Palmerston North City Council	Zoning Maps	Support	<p>The wetland feature and crescent shaped park in the local neighbourhood centre is showing as being zoned residential, but it will be zoned Recreation . The recreation reserve space on the "Voss" block is showing as Conservation and Amenity, but the portion fronting the road should be zoned recreation. The zoning needs to be corrected to align with the Aokautere Structure Plan.</p> <p>The notified map shows two Rural parcels adjacent to Turitea Rd with opacity applied over them in error. It can be implied that they are rural, which is consistent with other parcels outside of the structure plan area. For clarity sake, the map</p>	<p>That zoning should be amended to reflect the Aokautere Structure Plan. An amended Zoning Map is attached as Appendix 2.</p>	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				should be amended to clearly show that they are Rural Zone.		
FS18.014	Heritage Estates 2000 Ltd		Oppose	The plan change seeks to impose a specific design solution, this imposition is unnecessary. The PCG should enable modifications and alternatives to the Structure Plan (and therefore the zoning map) notified for the area, through the wording of the plan where the alternatives and modifications demonstrate integrated infrastructure for growth.	Reject That the submission is not accepted.	Reject
S50.006	Palmerston North City Council	Definitions	Support	The definition for Developable Land should include an "or" rather than "and" to be consistent with the inserted text for the definition of 'limited development'.	Amend definition for Developable Land as follows: Developable Land means any land in Aokautere: a. that is identified as developable in Map 10.1 and Map 10.1A: or b. for which any land instability, erosion or subsidence hazard associated with the land will be avoided or mitigated by specifically designed geotechnical engineering works for which a valid, restructured land resource consent exists. In relation to the establishment of buildings and structures, the works required by the restructured land resource consent must have been completed.	Accept
S50.007	Palmerston North City Council	Definitions	Support	"ARI" term is used in proposed provisions, but is not defined.	Insert a new definition for Average Recurrence Interval (ARI) as follows: Average Recurrence Interval (ARI) means the average time period between floods of a certain size. For example, a 100-year ARI flow will occur on average once every 100 years.	Reject
S50.008	Palmerston North City Council	7: Objective 3	Support	Objective 3 does not explicitly address natural hazards but the proposed policies to be inserted under it do. A more obvious cascade link between the policies and the objective is necessary.	Amend Objective 3 as follows: OBJECTIVE 3 To ensure that subdivision of land and buildings in rural areas is consistent with	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<p>integrated management of the use, development and protection of land and other natural and physical resources and</p> <ul style="list-style-type: none"> • retains Class 1 and Class 2 versatile soils for use as production land • retains the productive capability of rural land and recognises the valuable contribution made by class 3 soils • enables small landholdings for intensive horticulture activities in the Flood Protection Zone • provides for limited rural residential development on land which contains less versatile soils • maintains the low density development pattern in the Moonshine Valley Rural Residential Area • requires development to be in general accordance with any relevant Structure Plan • provides for efficient and effective on-site services and regular maintenance • avoids connection to the City's reticulated infrastructure network and consequential impacts on network efficiency and the extension and/or upgrade of the infrastructure network, including the road network and pressure sewer systems • preserves or enhances rural character • avoids reverse sensitivity effects 	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<ul style="list-style-type: none"> enables the acquisition or disposal of land for network utilities, public works and quarrying protects, restores and enhances the gully network in Aokautere. Avoids, remedies or mitigates the risks and effects of natural hazards. 	
S50.009	Palmerston North City Council	R7.15.4.1.4	Support	A minor grammatical amendment is suggested to improve plan clarity. It is submitted that R7.15.4.1.4 should replace "and" with "or" where the Aokautere Structure Plan is being referenced.	That R7.15.4.1.4 be amended as follows: 7.15.4 RULES: NON-COMPLYING ACTIVITIES R7.15.4.1 Non-Complying Activities ... 4. Any subdivision which does not comply with the Restricted Discretionary Activity Performance Standard for Minimum Lot Area (R7.15.2.1(b)(i),(ii) and (iii)) and/or Subdivision in the Rural-Residential Area identified on the Aokautere Structure Plan (R7.15.2.1(f)), is a Non-Complying Activity.	Accept
S50.010	Palmerston North City Council	7A.1 Introduction	Support	This section needs to also reference all the other maps in the Aokautere Structure Plan to avoid confusion and inconsistency with definitions of Greenfield Residential Area and the Aokautere Residential Area as currently shown on the Aokautere Structure Plan.	Amend Section 7A.1 Introduction as follows: 7A.1 Introduction Subdivision is a process to enable the separate ownership of land and the registration of interests in land. Subdivision of land is defined by the Resource Management Act 1991. This section enables greenfield development within: <ul style="list-style-type: none"> The Whakarongo Residential Area (Map 7A.1) The Kikiwhenua Residential Area (Map 7A.2) The Aokautere Residential Area Map 7A.4, 7A.4A, 7A.4B, 7A.4C, 7A.4D) These areas were identified for residential growth in the Palmerston North City Development Strategy 2017. The provisions	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					within this section require well designed, attractive and functional communities within the Greenfield Residential Areas. The Structure Plans for each Greenfield Residential Area will direct subdivision and provides for neighbourhood centres and public open spaces. A mix of activities and densities are provided for which will assist with achieving a variety of living choices and diverse communities.	
S50.011	Palmerston North City Council	7A: Policy 4.7	Support	Policy 4.7 refers to the Aokautere Church Stream, Moonshine Valley Reserve Stream and Tutkiwi Reserve Stream "as shown on the Aokautere Structure Plan" but these are not illustrated on the relevant structure plans. The Aokautere Structure Plan should be updated to include these features.	That the Aokautere Structure Plan be updated to include reference to the Aokautere Church Stream, Moonshine Valley Reserve Stream and Tutkiwi Reserve Stream.	Accept
S50.012	Palmerston North City Council	7A: Policy 4.8	Support	Policy 4.8 includes a reference to 'stormwater ponds' and notes that these are referenced on the structure plan. The structure plan only refers to these as [detention] ponds.	That Policy 4.8 is amended as follows: 4.8 To require the design and management of stormwater to incorporate the stormwater management areas, and stormwater detention ponds shown on the Aokautere Structure Plan	Reject
S50.013	Palmerston North City Council	7A: Policy 5.8	Support	The policy refers to the provision of roads identified on the Aokautere Structure Plan but the intent (as also described in the policy) is to deliver the transport network including cycle and walking routes/paths. There is also potential repetition between this policy, and policy 5.12, and officers suggest including 5.12 into that policy.	Amend Policy 5.8 as follows: To ensure that the design and layout of any subdivision and development provides for roads the transport network identified on the Aokautere Structure Plan in a manner which: <ul style="list-style-type: none"> • Achieves an accessible and permeable grid like pattern of development as shown on the Aokautere Structure Plan • Delivers a safe, legible and effective movement network which conforms to the One Network Framework and reflects Aokautere's hierarchy of street types (Map 7A.4A) and cross-sections (Map 7A.4D) • Avoids or minimises adverse effects on the safe and efficient operation, maintenance and access to network utilities and the 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
					<p>transport network</p> <ul style="list-style-type: none"> • Produces a fine-grained network of streets that provide: <ol style="list-style-type: none"> a. permeable and connected neighbourhoods; b. a choice of pathways; and c. access from two directions for most households. • Complements the street network with a web of trails in the gully reserves • Provides circuits of varying length for walking, jogging and cycling • Encourages active travel modes • Provides a highly connected street layout which integrates with the surrounding transport network and includes pedestrian access, cycleways and recreational trails which link to open space corridors <p>That Policy 5.12 be deleted and that the numbering for subsequent policies be updated to reflect this.</p>		
FS16.012	Waka Kotahi NZ Transport Agency		Support	Waka Kotahi supports a well-functioning urban environment which facilitate a reduction in emissions and supports mode shift, this requires the transport system to be well connected.	Accept in part	Waka Kotahi seeks this submission is allowed.	Accept in part
S50.014	Palmerston North City Council	R7A.5.2.2	Support	This standard should also refer to Map 7A.4E which also shows the 5 metre no build setback.	Amend R7A.5.2.2(a)(xvii) as follows: (xvii) how the subdivision proposal provides for the establishment and maintenance of the 5 metre no-build setback identified on the Aokautere Structure Plan (Map 7A.4 and Map 7A.4.4E)	Reject	
S50.015	Palmerston North City Council	R7A.5.2.2	Support	References to 'contiguous developable land' should be amended to read 'contiguous Developable Land' to recognise that Developable	Amend R7A.5.2.2(d)(iii) as follows: (d) Lot Size ...	Accept	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				Land is a defined term in Section 4: Definitions. Amend so the definition is capitalised.	(iii) In the Aokautere Residential Area, no single lot shall be: <ul style="list-style-type: none"> Less than 400m² of contiguous developable land within the Suburban Density Areas shown on the Aokautere Structure Plan, with the average area of lots available for residential purposes being at least 600m². In calculating the average lot area, no lots over 1000m² shall be included. Less than 150m² within the Medium Density Areas shown on the Aokautere Structure Plan, with the average minimum number of dwellings being 25 per hectare. 	
S50.017	Palmerston North City Council	10: Policy 11.3	Support	This policy should also refer to Map 7A.4E which also shows the 5 metre no build setback.	That Policy 11.3 be amended to include reference to all relevant Aokautere Structure Plans, as follows: 11.3 To ensure buildings, structures and landscaping are not located in the 5 metre no build setback identified on the Aokautere Structure Plan (Map 7A.4 & 7A.4E) to protect against the risk of natural hazards.	Reject
S50.018	Palmerston North City Council	R10.6.1.1	Support	Plan Change G has introduced street typologies into the Structure Plans, which are consistent with Waka Kotahi's new One Network Road Classification (ONRC). The Operative Plan in Section 20: Land Transport uses outdated terminology for road typologies. Many of the operative typologies share characteristics with the ONRC versions. Council intends to undertake a future plan change to reclassify the street types to align with the ONRC. In the meantime, there is a mismatch between the terminology in the Aokautere Structure Plan and Section 20: Land Transport. This has potential implications for how	That Section 20.6 Rooding Hierarchy be amended to include the following Note to Plan Users: ...Note to Plan Users For the purpose of interpreting Map 7A.4D1-17 the following road typologies are to be assessed as follows: <ul style="list-style-type: none"> Urban connectors shall be considered Collector Roads, except Pacific Drive which is considered a Minor Arterial 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				Vehicle Access provisions are assessed under R10.6.1.1(g). Council considers that there is benefit in retaining the ORNC terminology referenced in Plan Change G, so that it is set up to respond to the new network classification when it is implemented. Until a full implementation of the ONRC is promoted a transitional approach is suggested to be taken in Aokautere. This could be achieved through adding a new explanatory note in Section 20.6 that details how the following road types in Map 7A.4D1-17 be interpreted.	<ul style="list-style-type: none"> • Activity Streets shall be considered Pedestrian Streets • Local Streets shall be considered Local Roads • Peri-urban roads shall be considered Local Roads 		
FS16.016	Waka Kotahi NZ Transport Agency		Support	Waka Kotahi supports the use of the One Network Road Classification and Council undertaking a future plan change to reclassify the street types to align with the One Network Road classification.	Accept in part	Waka Kotahi seeks this submission is allowed	Accept in part
S50.019	Palmerston North City Council	R10.6.3.3	Support	A minor amendment is proposed to R10.6.3.3ix to clarify that the Aokautere Residential height, recession and setback requirements apply to area I. Deletion of the word "additional" for this performance standard heading is also requested as it is considered to be unnecessary.	Amend R10.6.3.3ix as follows: x. Additional Height, recession and setback requirements in the Aokautere Residential Area (a) No building shall exceed 11m within Area I. (b) All buildings within Area II shall be contained within a 45° plane commencing at 5m above ground level inclined inwards at right angles in plan for the front two thirds of the side boundary and 2.8m for the rear one-third of the side boundary (See Figure 10.2) unless it is located at the boundary of a Suburban Low Density allotment in which case the recession plan shown in Figure 10.1 applies.	Accept	
S50.020	Palmerston North City Council	R10.6.3.4	Support	R10.6.3.4 contains an incorrect cross reference. It should refer to Map 10.6.3.3(i) instead of 10.6.3.3(h). Area (h) refers to Whiskey Creek.	That R10.6.3.4 be amended to read as follows: R10.6.3.4 Non-Notification of Multi- Unit Residential Development Activities in the Hokowhitu Lagoon Residential Area and the Aokautere Residential Area Applications made for restricted discretionary consent applications under R10.6.3.3 for sites associated with Map	Accept	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					10.6.3.3(g) and 10.6.3.3(hi) must not be publicly or limited notified.	
S50.021	Palmerston North City Council	R10.6.5.6	Support	<p>This is a proposed new rule, but is not shown underlined and bolded in the notified version of the Plan.</p> <p>The reference to R7A.5.2.2(i) is an error and should refer to (h).</p>	<p>That R10.6.5.6 be amended as follows: Show new rule in underline and bold and amend 'i' to 'h' as shown below. R10.6.5.6 Transport Infrastructure (Aokautere Residential Area) Notwithstanding the activity status set out in R10.6.1.5 and 10.6.3.2, all development that occurs before the completion and certification of the works identified in R7A.5.2.2(h), within the stipulated timeframes, shall be a Non-Complying Activity.</p>	Accept
S50.022	Palmerston North City Council	R10.7.1.6	Support	R10.7.1.6 is missing a reference to Map 10.1A.	<p>That R10.7.1.6 be amended as follows: R10.7.1.6 Limited Development Land in the Aokautere Development Area The following are Permitted Activities on any land shown as Limited Development land in the Aokautere Development Area, as shown on Map 10.1 or Map 10.1A, provided they comply with the following Performance Standards: ...</p>	Reject
S50.023	Palmerston North City Council	11.10: Policy 6.1	Support	Policy 6.1 contains reference to providing for "retail and commercial activities"; however, retail activity has a specific definition in the District Plan which relates to the 'Fringe Business Zone' only. Therefore, policy 6.1 should be amended to provide for "local business activities", thereby avoiding the risk of confusion with the specific definition applying to the Fringe Business Zone.	<p>That Policy 6.1 be amended to read as follows: POLICIES 6.1 To provide for local retail and commercialbusiness activities in specific locations as identified on the Aokautere Neighbourhood Centre Precinct Plan (Map 7A.4C).</p>	Accept
S50.024	Palmerston North City Council	R11.10.3.1	Support	A consequential amendment is needed in R11.10.3.1 to provide a non-compliance consenting pathway for the new performance standard R11.10.2.1 (g). Assessment (h) also	<p>That R11.10.3.1 be amended as follows: 11.10.3 RULES: RESTRICTED DISCRETIONARY ACTIVITIES R11.10.3.1 Activities which do not comply with the Permitted Activity Performance</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				needs to be corrected so that it references to R11.10.2.1 (g) instead of (d).	Standards Activities which do not comply with the Permitted Performance Standards (in R11.10.2.1) in relation to: (a) Lighting (b) Screening (c) Size of Function (d) Residential Accommodation (e) Vehicle Parking (f) Loading and Access (g) Car Park Landscape Design (h) Servicing and Loading Hours (i) Signs (j) Residential Activities in the Aokautere Neighbourhood Centre (Map 7A.4C) ... (h) Residential Activities in the Aokautere Neighbourhood Centre The assessment criteria contained in R11.9.3.1(dg)	
S50.025	Palmerston North City Council	General - No specific provision referenced	Support		The proposed plan change is supported by Council officers. However, the amendments set out above [in submission], or any considered by a decision-maker to have the same or similar effect, are sought as they are considered necessary for clarity, correction, and/or consistency with the plan change outcomes. Along with the specific relief sought in this submission, Council officers seek any other consequential amendments required for clarity or consistency in relation to the above matters. Further, consequential relief is also sought for any aspect of the plan change not specifically referred to in the table above where this amounts to minor edits to correct numbering, cross-references or minor errors.	Accept
S51.001	Heritage Estates 2000 Limited	Whole of Plan Change	Oppose	A good resource management practice requires that sufficient particulars are given in a concise and transparent manner to enable those who	HEL has identified gaps in the information provided at the time of notification and seeks amendment, correction, or decline of the	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>might wish to make submissions on PCG to be able to assess both the effects on the environment and on their own interests. Would-be submitters should not themselves have to engage in detailed investigations to enable them to assess the effects of PCG.</p> <p>A Section 32 requires that the objectives of the Plan Change must be examined for their appropriateness in achieving the purpose of the RMA and that the benefits, costs and risks of new policies and rules need to be clearly identified and assessed.</p>	plan change if these matters cannot be rectified through the further submission, evidence and hearings process.	
S51.002	Heritage Estates 2000 Limited	Section 32 Report - Section 2: Why Aokautere?	Oppose	A Section 32 requires that the objectives of the Plan Change must be examined for their appropriateness in achieving the purpose of the RMA and that the benefits, costs and risks of new policies and rules need to be clearly identified and assessed. Section 32(2)(b) of the RMA requires that if practicable, the benefits and costs of a proposal are quantified. In this instance, the PCG Section 32 does not address the benefits, costs and risks of advancing PCG ahead of PCWL Plan Change B2.	HEL submits that the timing of PCG is not in accordance with all earlier Council resolutions for urban growth in the City. The Council has a statutory duty to hear Pioneer City West Limited on their accepted and notified Private Plan Change B.	Reject
S51.003	Heritage Estates 2000 Limited	Section 32 Report - Section 3: Regulatory and Policy Context	Oppose	The Council wants to delay giving effect to the national planning standards; "the national planning standards will be adopted in a more integrated way through a subsequent plan change to the district plan." However, the submitter considers this to be an inefficient approach. PCG is notified 3 years after the national planning standards came into effect, and it is likely that the plan change will be heard in 2023 and made operative in 2024 or 2025 subject to appeals.	PCG should have been prepared and notified in accordance with the national planning standards. HEL opposes the advancement of PCG where it is not in accordance with the National Planning Standards.	Reject
S51.004	Heritage Estates 2000 Limited	Section 32 Report - Section 3:	Neutral	The Section 32 fails to address the pending National Policy Statement for Highly Productive Land, there is insufficient information on how PCG responds to the pending NPS-HPL. The MfE	HEL is neutral on the interface between the NPS-UD and the NPS-HPL, but if both are in force, then both shall be given effect to as they relate to PCG. The PCG notified shall be	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
		Regulatory and Policy Context		website advises that the draft NPS-HPL will be made 'final' within a short space of time and is likely to be relevant to PCG. It is unclear whether the NPS-UD takes precedence over the NPS-HPL with respect to Urban Growth.	amended to give effect to the relevant National Policy Statements in force prior to the decision on PCG as required by the RMA.	
S51.005	Heritage Estates 2000 Limited	10.4: Methods	Oppose	HEL opposes the inclusion of Masterplan 'Method' as a non-regulatory tool that Council officers can consider for consenting under section 104 of the RMA.	HEL opposes this information is being incorporated by reference in District Plan.	Reject
S51.006	Heritage Estates 2000 Limited	Whole of Plan change - Adderstone Reserve option	Oppose	As a precautionary approach HEL opposes all notified options in PCG that relate to "a separate statutory process under the Reserves Act 1977" and is advised Parliamentary website that the separate process achieved Royal Assent prior to this submission (published 31.8.2022, notified as updated on 2 September 2022).	The submitter considers that the Greenfields Reserve Criteria in the Supplementary Information on the Councils ODP appears to be at odds with the notified PCG.	Accept in part
S51.007	Heritage Estates 2000 Limited	Whole of Plan Change	Oppose	These have the potential to affect other areas of the city that are outside the area of PCG (are not on the PCG) and have not been assessed or reported on in the s32 report notified.	HEL opposes general amendments in PCG that do not relate specifically to PCG and are not deemed to be consequential changes resulting from PCG.	Accept
S51.008	Heritage Estates 2000 Limited	Structure Plans (General)	Oppose	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents the restricts innovative alternatives and flexibility.	[No specific relief sought]	Accept in part
S51.009	Heritage Estates 2000 Limited	Definitions	Oppose		HEL opposes the notified changes to the ODP section 4. Definitions in their current form and seeks rewording of the underlined text to better achieve the purpose of the Act.	Accept in part
S51.010	Heritage Estates 2000 Limited	Definitions	Oppose		The terms "gully network" and/or "natural gully network" are undefined in the Plan, the Horizons Regional Plan and the NPS etc, greater clarity is necessary in relation to other sections of the Plan to enable clarity for the plan users.	Accept
S51.011	Heritage Estates 2000 Limited	7: Objective 3	Oppose	The mitigation of effects through this approach may not achieve the purpose of the Act, there is no	The inclusion of the words "Requires development to be in general accordance	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				review and update of the Structure Plan through 'general accordance' reference in PCG.	with any relevant structure plan" and "Protects Restores and enhances the gully network" at Objective 3 of Section 7 Subdivision 7 are opposed.	
S51.012	Heritage Estates 2000 Limited	7: Policy 3.7	Oppose	The mitigation of effects through this approach may not achieve the purpose of the Act, there is no review and update of the Structure Plan through 'general accordance' reference in PCG.	All proposed text associated with Policy 3.7 wording is opposed.	Reject
S51.013	Heritage Estates 2000 Limited	R7.15.2.1	Oppose	These changes are not specific to PCG and affect other areas of the city outside the notified plan change area.	All text amendments (additions) under this heading are opposed.	Accept in part
S51.014	Heritage Estates 2000 Limited	R7.15.2.1	Oppose		Performance Standard (c) Natural Hazards and On-site Services: The text amendments (additions) and deletions are not supported in their current form. The submitter seeks more appropriate text.	Accept
S51.015	Heritage Estates 2000 Limited	R7.15.2.1	Oppose		Performance Standard (f) Subdivision in the Rural Residential Area identified on the Aokautere Structure Plan: The text amendments (additions) and deletions are not supported in their current form. The submitter seeks more appropriate text.	Accept
S51.016	Heritage Estates 2000 Limited	R7.15.2.1	Support		R7.15.2.1 Performance Standard, Assessment Criteria below (Determination Clause) at (b) On- site services: The text addition of "and the surrounding environment" is supported.	Accept
S51.017	Heritage Estates 2000 Limited	R7.15.2.1	Oppose		R7.15.2.1 Performance Standard, Assessment Criteria below (Determination Clause) at (h) Rural-Residential Development within Aokautere Structure Plan: The text amendments (additions) and deletions are not supported in their current form. The submitter seeks more appropriate text.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S51.018	Heritage Estates 2000 Limited	R7.15.4.1.4	Oppose		The added text reads "and Subdivision in the Rural-Residential Area identified on the Aokautere Structure Plan (R7.15.2.1(f))". The text amendments are not supported in their current form. The submitter seeks more appropriate text.	Accept
S51.019	Heritage Estates 2000 Limited	7A: Policy 1.2	Oppose	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	The amendment to Polices 1.2, 1.3, 1.4 are non-specific to the Aokautere Residential Area (Map 7A.4) insert and are opposed.	Accept
S51.020	Heritage Estates 2000 Limited	7A: Policy 1.3	Oppose	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	The amendment to Polices 1.2, 1.3, 1.4 are non-specific to the Aokautere Residential Area (Map 7A.4) insert and are opposed.	Accept
S51.021	Heritage Estates 2000 Limited	7A: Policy 1.4	Oppose	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents the restricts innovative alternatives and flexibility.	The amendment to Polices 1.2, 1.3, 1.4 are non-specific to the Aokautere Residential Area (Map 7A.4) insert and are opposed.	Accept in part
S51.022	Heritage Estates 2000 Limited	7A: Policy 2.5	Oppose	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	The amendments to Policy 2.5 addition of bullet point 4 is opposed.	Reject
S51.023	Heritage Estates 2000 Limited	7A: Policy 3.2	Support in part		The added bullet point text "Earthworks in the Aokautere Residential Area avoid adverse effects on the gully network." Support condition[al] to opposition on the definition of gully network.	Accept
S51.024	Heritage Estates 2000 Limited	7A: Policy 3.4	Support in part		Support condition[al] to opposition on the definition of gully network	Accept
S51.025	Heritage Estates 2000 Limited	7A: Objective 4	Support		Added words "which does not result in adverse effects on the environment." Support	Reject
S51.026	Heritage Estates 2000 Limited	7A: Policy 4.3	Oppose		Amended and added wording at 4.3 and 4.4 are opposed.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S51.027	Heritage Estates 2000 Limited	7A: Policy 4.4	Oppose		Amended and added wording at 4.3 and 4.4 are opposed.	Reject
S51.028	Heritage Estates 2000 Limited	7A: Policy 4.6	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording 4.6 to 4.9 is conditionally supported, HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set out in other parts of this submission.	Accept
S51.029	Heritage Estates 2000 Limited	7A: Policy 4.7	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording 4.6 to 4.9 is conditionally supported, HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.030	Heritage Estates 2000 Limited	7A: Policy 4.8	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording 4.6 to 4.9 is conditionally supported, HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Reject
S51.031	Heritage Estates 2000 Limited	7A: Policy 4.9	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording 4.6 to 4.9 is conditionally supported, HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.032	Heritage Estates 2000 Limited	7A: Objective 5	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.033	Heritage Estates 2000 Limited	7A: Policy 5.1	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.034	Heritage Estates 2000 Limited	7A: Policy 5.2	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with	Added wording where it relates to the Aokautere Residential Area is conditionally	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	
S51.035	Heritage Estates 2000 Limited	7A: Policy 5.3	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.036	Heritage Estates 2000 Limited	7A: Policy 5.4	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.037	Heritage Estates 2000 Limited	7A: Policy 5.5	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.038	Heritage Estates 2000 Limited	7A: Policy 5.6	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Reject
S51.039	Heritage Estates 2000 Limited	7A: Policy 5.7	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.040	Heritage Estates 2000 Limited	7A: Policy 5.8	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	
S51.041	Heritage Estates 2000 Limited	7A: Policy 5.9	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.042	Heritage Estates 2000 Limited	7A: Policy 5.10	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.043	Heritage Estates 2000 Limited	7A: Policy 5.11	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.044	Heritage Estates 2000 Limited	7A: Policy 5.12	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Reject
S51.045	Heritage Estates 2000 Limited	7A: Policy 5.13	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.046	Heritage Estates 2000 Limited	7A: Policy 5.14	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					relation to these clauses as set-out in other parts of this submission.	
S51.047	Heritage Estates 2000 Limited	7A: Policy 5.15	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Reject
S51.048	Heritage Estates 2000 Limited	7A: Objective 6	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.049	Heritage Estates 2000 Limited	7A: Policy 6.1	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.050	Heritage Estates 2000 Limited	7A: Policy 6.2	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.051	Heritage Estates 2000 Limited	7A: Policy 6.3	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.052	Heritage Estates 2000 Limited	7A: Policy 6.4	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					relation to these clauses as set-out in other parts of this submission.	
S51.053	Heritage Estates 2000 Limited	7A: Policy 6.5	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.054	Heritage Estates 2000 Limited	7A: Policy 6.6	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept in part
S51.055	Heritage Estates 2000 Limited	7A: Policy 6.7	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.056	Heritage Estates 2000 Limited	7A: Policy 6.8	Support in part	HEL opposes the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents [or] restricts innovative alternatives and flexibility.	Added wording where it relates to the Aokautere Residential Area is conditionally supported. HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Accept
S51.057	Heritage Estates 2000 Limited	7A:4 Methods	Oppose		HEL opposes this wording and the Aokautere Structure Plan and Aokautere Masterplan being incorporated in the plan.	Reject
S51.058	Heritage Estates 2000 Limited	R7A.5.2.1	Oppose		R7A.5.2.1, 1. c., 1.r., and 1.t. The added text wording is opposed it relates to all greenfield residential and is not a necessary consequential change that results from PCG	Accept
S51.059	Heritage Estates 2000 Limited	R7A.5.2.2	Support		R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (a) (v):	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					Added text is specific to Aokautere Residential Area	
S51.060	Heritage Estates 2000 Limited	R7A.5.2.2	Oppose		R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (a) Comprehensive Development Plan (viii), (ix), (xv), (xvi), (xvii), (xviii), (xix), (xx), (xxiii): The added text wording is opposed, it relates to all greenfield residential and is not a necessary consequential change that results from PCG. Where the text does relate to PCG, the text includes wording in relation to Structure Plan and/or Precinct plan which the submitter opposes. Aspects of the proposed text appear unworkable.	Accept in part
S51.061	Heritage Estates 2000 Limited	R7A.5.2.2	Oppose		R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (b) Essential Services (v): This text relates to areas outside the PCG area and is opposed.	Reject
S51.062	Heritage Estates 2000 Limited	R7A.5.2.2	Oppose		R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (d) Lot size (ii) & (iii): Added text is opposed.	Accept in part
S51.063	Heritage Estates 2000 Limited	R7A.5.2.2	Oppose		R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (e) Cul-de-sacs (i): The proposed amendment to text is not supported. Retain the existing Plan text.	Accept in part
S51.064	Heritage Estates 2000 Limited	R7A.5.2.2	Oppose		R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (e) Cul-de-sacs (ii): The proposed amendment to text is not supported. Delete the proposed words "unless otherwise shown on the area's relevant Structure Plan."	Reject
S51.065	Heritage Estates 2000 Limited	R7A.5.2.2	Oppose		R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (g), (h): The proposed amendment to text is not supported. The submitter has concerns in relation to the flood modelling and land stability presented in the technical reports,	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					although most of the text is specific to the Aokautere Residential Area, requirements for both flood modelling and transport network including climate change effects are unclear. Also refer to submission on definitions.	
S51.066	Heritage Estates 2000 Limited	R7A.5.2.3	Oppose	The submitter has concerns in relation to the flood modelling and land stability, landscaping, presented in the technical reports, although most of the text is specific to the Aokautere Residential Area, effects are unclear. Also refer to submission on definitions and submission as they relate to structure plans and/or precinct plans	R7A.5.2.3 Assessment Criteria for Restricted Discretionary Activity: R7A.5.2.3 (d): The proposed amendment to text is not supported.	Accept in part
FS16.017	Waka Kotahi NZ Transport Agency		Oppose	Opposed to the removal of assessment criteria for restricted discretionary activities for subdivision and development in the Aokautere Residential Area. Should Plan Change G proceed it is essential that appropriate transport infrastructure is required to be provided prior to development.	Reject Waka Kotahi seeks this submission is disallowed.	Reject
S51.067	Heritage Estates 2000 Limited	R7A.5.3.1	Support		Support amendment.	Accept
S51.068	Heritage Estates 2000 Limited	R7A.5.5.1	Oppose		The proposed amendment to text is not supported.	Accept in part
S51.069	Heritage Estates 2000 Limited	Structure Plans (General)	Oppose		The notified maps are opposed.	Accept in part
S51.070	Heritage Estates 2000 Limited	10: Policy 1.5	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion.	Reject
S51.071	Heritage Estates 2000 Limited	10: Policy 11.3	Oppose		All amendments to the Objectives and Policies are opposed, this includes the addition of Policy 11.3 as it relates to Structure Plan maps.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S51.072	Heritage Estates 2000 Limited	10: Objective 15	Oppose		All amendments to the Objectives and Policies are opposed, this includes Objective 15.	Reject
S51.073	Heritage Estates 2000 Limited	10: Policy 15.1	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Accept in part
S51.074	Heritage Estates 2000 Limited	10: Policy 15.2	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Reject
S51.075	Heritage Estates 2000 Limited	10: Policy 15.3	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Reject
S51.076	Heritage Estates 2000 Limited	10: Policy 15.3	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Reject
S51.077	Heritage Estates 2000 Limited	10: Policy 15.4	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Accept
S51.078	Heritage Estates 2000 Limited	10: Policy 15.5	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Reject
S51.079	Heritage Estates 2000 Limited	10: Policy 15.6	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	
S51.080	Heritage Estates 2000 Limited	10: Policy 15.6	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Reject
S51.081	Heritage Estates 2000 Limited	10: Policy 15.7	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Accept
S51.082	Heritage Estates 2000 Limited	10: Policy 15.8	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Reject
S51.083	Heritage Estates 2000 Limited	10: Policy 15.9	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Accept in part
S51.084	Heritage Estates 2000 Limited	10: Policy 15.10	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Accept in part
S51.085	Heritage Estates 2000 Limited	10: Policy 15.11	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	Accept
S51.086	Heritage Estates 2000 Limited	10: Policy 15.12	Oppose		All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12.	
S51.087	Heritage Estates 2000 Limited	10.4: Methods	Oppose		The inclusion of the Aokautere Masterplan and the associated text is Opposed.	Reject
S51.088	Heritage Estates 2000 Limited	R10.6.1.5	Oppose		R10.6.1.5 amendments to text. R10.6.1.5 (c), R10.6.1.5 (d), R10.6.1.5 (h); All amendments proposed that are not specific to the Aokautere residential area PCG are opposed. All text that is not specific to Aokautere Residential area and would apply to areas outside the PCG mapped area is not considered a consequential change resulting from Aokautere Residential PCG and is opposed.	Accept
S51.089	Heritage Estates 2000 Limited	R10.6.3.2	Oppose		R10.6.3.2 i. Addition of "including Maximum Height and Height Recession Planes" and vii. Addition of "and access" is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not on the plan change	Reject
S51.090	Heritage Estates 2000 Limited	R10.6.3.2	Oppose		R10.6.3.2 under "are Restricted Discretionary Activities with regard to:" Addition of "including timing of roading infrastructure, connectivity of the street network and effects on vehicular, pedestrian and cycle movement and safety" after the words "The safe and efficient operation of the roading network". The plan should enable private owner or developer led roading, pedestrian and cycle infrastructure provided it promotes the safe and efficient operation of the roading network and pedestrian/cycling connectivity. And the addition of the single word "Earthworks" is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not a consequential	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					change resulting from Aokautere Residential PCG	
FS16.018	Waka Kotahi NZ Transport Agency		Oppose	Do not support the opposition to the performance Standards for buildings or structures requiring consideration of the timing of roading infrastructure, connectivity of the street network and effects on vehicular pedestrian and cycle movement and safety. Should Plan Change G proceed it is essential that appropriate transport infrastructure is required to be provided prior to development.	Reject Waka Kotahi seeks this submission is disallowed	Reject
S51.091	Heritage Estates 2000 Limited	R10.6.3.2	Oppose		R10.6.3.2 Assessment Criteria item (i): Addition of "including through provision of a range of development density, housing types and forms and the opportunity for mixed use." is not specific to Aokautere Residential area PCG and would apply to every Greenfield Residential Area in other parts of the City and is not on the plan change	Reject
S51.092	Heritage Estates 2000 Limited	R10.6.3.2	Oppose		R10.6.3.2 Assessment Criteria R10.6.3.2 (l): "(l) How use and development in the Aokautere Residential Area integrates with the neighbourhood centre identified in the Aokautere Neighbourhood Centre Precinct Plan (Map 7A.4C)". The addition is not supported as the map is too prescriptive and does not enable adjustment that may be required as development occurs.	Reject
S51.093	Heritage Estates 2000 Limited	R10.6.3.2	Oppose		R10.6.3.2 Assessment Criteria R10.6.3.2 (o): "(o) Whether buildings, structures and landscaping have been avoided in the 5 metre no-build setback identified on the Aokautere Structure Plan (Map 7A.4)". The addition is not supported as the map is too prescriptive and does not enable adjustment that is likely to be required as development occurs.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S51.094	Heritage Estates 2000 Limited	R10.6.3.3	Oppose		<p>Addition of the word "Height" as the addition is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not on the plan change.</p> <p>The introduction of the words Site "density and" layout as the addition is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not on the plan change.</p>	Accept in part
S51.095	Heritage Estates 2000 Limited	R10.6.3.3	Support		[Support] R10.6.3.3 under Performance standards the addition at R10.6.3.3 iii. Site Coverage: The addition of "unless in the Aokautere Residential Area where a maximum site coverage of 45% applies."	Accept
S51.096	Heritage Estates 2000 Limited	R10.6.3.3	Support		[Support] R10.6.3.3 under Performance standards the addition at R10.6.3.3 iv (b) bullet point 2: The addition of "A minimum of 8m ² in area, unless a unit in the Aokautere Residential Area has less than two bedrooms in which case a minimum of 5m ² applies."	Accept
S51.097	Heritage Estates 2000 Limited	R10.6.3.3	Oppose		<p>R10.6.3.3 under Performance standards the addition at R10.6.3.3 vii. Stormwater Design: The addition of wording at bullet point 2 adding the word "demonstrate" is opposed. The addition of the fourth bullet point</p> <ul style="list-style-type: none"> • "demonstrate how the stormwater design aligns with the Stormwater Management Plan prepared under R7A.5.2.3(g)" is opposed and the addition of the addition of the fifth bullet point: • "demonstrate how adverse effects on the gully network in Aokautere will be avoided. The proposed text is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					not a consequential change resulting from Aokautere Residential PCG.	
S51.098	Heritage Estates 2000 Limited	R10.6.3.3	Support		Introduced notified text "Additional height, recession and setback requirements in the Aokautere Residential Area ..." The proposed text is specific to Aokautere Residential Area.	Accept
S51.099	Heritage Estates 2000 Limited	R10.6.3.3	Oppose		R10.6.3.3 under Performance standards the addition at R10.6.3.3 separation distances, x: Introduced notified text "x. Compliance with R10.6.1.5(c)(iv)." The addition is not supported as the Aokautere Residential Structure Plan is too prescriptive and does not enable adjustment that is likely to be required as development occurs. Flexibility in wording to enable greater or less than 5m should be considered for the setback.	Accept
S51.100	Heritage Estates 2000 Limited	R10.6.3.3	Oppose		R10.6.3.3 Assessment Criteria 1 Character (f): Added text "development within the Aokautere Residential Area responds to the natural gully network, open space and the network of cycleways and recreational trails."	Reject
S51.101	Heritage Estates 2000 Limited	R10.6.3.3	Oppose	R10.6.3.3 Assessment Criteria 2 Site Planning amendments to (a): "(a) buildings and related open spaces and landscaping are planned and designed together to deliver high levels of amenity within a range of housing types and forms dwellings and well- located, good quality open spaces, which are consistent with any relevant Greenfields Structure Plan and within the Hokowhitu Lagoon Residential Area provides a safe interface with the adjoining Manawatu Golf Course." The proposed text seeks to amend the assessment criteria of all current and future greenfield areas	[No specific relief sought]	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				rather than amending the plan text for the Aokautere Residential area notified.		
S51.102	Heritage Estates 2000 Limited	R10.6.3.3	Oppose		R10.6.3.3 Assessment Criteria 5 infrastructure and Servicing (c): Item (c) is added but is not bold and underlined as notified. "(c) buildings, structures and landscaping are avoided in the 5 metre no-build setback identified on the Aokautere Structure Plan (Map 7A.4)". The addition is not supported as the Aokautere Residential Structure Plan is too prescriptive and does not enable adjustment that is likely to be required as development occurs. Flexibility in wording to enable greater or less than 5m should be considered for the setback, an average of 5m but not less than 3m in width for greater than 4m, or similar.	Accept in part
S51.103	Heritage Estates 2000 Limited	R10.6.3.3	Support in part		Support subject to amendment to the notified text: R10.6.3.3 Assessment Criteria 6: The addition of Assessment Criteria 6 is supported with the following amendment 6. "Aokautere Residential Natural Hazards" in the title to the assessment criteria.	Accept
S51.104	Heritage Estates 2000 Limited	R10.6.3.4	Support		The text addition "and the Aokautere Residential Area" and map reference "and 10.6.3.3 (h)" is supported. The submitter remains opposed to the inclusion of the structure plan without greater flexibility for review and updating without a Schedule 1 process.	Accept
S51.105	Heritage Estates 2000 Limited	R10.7.4	Support		The deletion of "[Note: The following activities are also subject to R10.7.5.2 Non-Complying Activities.]" is supported	Accept
S51.106	Heritage Estates 2000 Limited	R10.7.4	Oppose		Opposed - The addition of "unless R10.7.5.2 applies, or in the case of Retirement Villages	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					in Greenfield Residential Areas, R10.7.5.3 applies."	
S51.107	Heritage Estates 2000 Limited	R10.7.4	Oppose	The submitter remains opposed to the inclusion of the structure plan without greater flexibility for review and updating without a Schedule 1 process.	Assessment criteria k: The added text commences with "In respect of R10.7.4.6, and where they are proposed in Greenfield Residential Areas, how any activity:" and is followed by bullet points. The bullet points duplicate (in part) aspects of the Assessment Criteria a-i. The inserted text for Retirement Villages and Residential Care Centres in Greenfield Residential Areas and is linked to structure plans/or precinct plans but this text relates City Wide to future Greenfield Residential Areas across the City rather than to the Aokautere Residential Areas. The text should be rewritten to be on PCG and is not considered to be consequential changes as a result of the insertion of new rules, as necessary.	Accept in part
S51.108	Heritage Estates 2000 Limited	R10.7.4	Oppose		Assessment criteria k. Note to Plan Users (deletions below the assessment criteria): Deleted text as it relates to R10.7.1.6 Limited Development Land in Aokautere: " • A plan must be submitted to identify appropriate stormwater design for the development, and: • demonstrate how peak run-off volume is to be mitigated • how low impact development principles are applied • identify a secondary flow path. " The deleted text appears relevant to R10.7.1.6 iii Drainage and water supply, particularly drainage and there is no explanation for the deletion of the guidance note with respect to stormwater design. The guidance note in the Plan appears helpful and should remain.	Reject
S51.109	Heritage Estates 2000 Limited	R10.7.5.3	Oppose	The submitter remains opposed to the inclusion of the structure plan without greater flexibility for review and updating without a Schedule 1	Opposed: Added text "R10.7.5.3 Retirement Villages in Aokatuere Residential Area Any new retirement village in the Aokautere	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				process. There may be good reasons to relocate the position of this activity relative to the structure plan later and non-compliance should not be triggered in this manner, particularly where the effects of the activity can be mitigated in any location.	Residential Area which is not located and developed in accordance with the Aokautere Structure Plan."	
S51.110	Heritage Estates 2000 Limited	R11.10.5	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan without greater flexibility for review and updating without a Schedule 1 process. The Plan should include a more enabling process.	Index deleted text R11.10.5.1 Offensive Activities and Crematoria and addition of "The following activities are Non- Complying Activities": (a) Offensive Activities, Industrial Activities, and Crematoria, "and Residential Accommodation at Ground Floor Level and Residential Activities at Ground Level in the Aokautere Neighbourhood Centre are Non-Complying Activities. and (b) The construction, reconstruction or alteration of any building or structure that does not comply with Performance Standard R11.10.2.2(j)".	Accept in part
S51.111	Heritage Estates 2000 Limited	11.10: Objective 6	Support in part	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	The added text is specific to the Aokautere Residential Area and is supported, but the Policies 6.1, 6.3, 6.6, 6.7 and 6.9 current wording are opposed where the wording connects in the Plan with predetermined design based on a structure plan/precinct plan dictate inflexible design solutions.	Accept
S51.112	Heritage Estates 2000 Limited	11.10: Policy 6.1	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	Policies 6.1, 6.3, 6.6, 6.7 and 6.9 current wording are opposed where the wording connects in the Plan with predetermined design based on a structure plan/precinct plan dictat[ing] inflexible design solutions.	Accept in part
S51.113	Heritage Estates 2000 Limited	11.10: Policy 6.3	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	Policies 6.1, 6.3, 6.6, 6.7 and 6.9 current wording are opposed where the wording connects in the Plan with predetermined design based on a structure plan/precinct plan dictat[ing] inflexible design solutions.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S51.114	Heritage Estates 2000 Limited	11.10: Policy 6.6	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	Policies 6.1, 6.3, 6.6, 6.7 and 6.9 current wording are opposed where the wording connects in the Plan with predetermined design based on a structure plan/precinct plan dictate inflexible design solutions.	Accept
S51.115	Heritage Estates 2000 Limited	11.10: Policy 6.7	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	Policies 6.1, 6.3, 6.6, 6.7 and 6.9 current wording are opposed where the wording connects in the Plan with predetermined design based on a structure plan/precinct plan dictat[ing] inflexible design solutions.	Reject
S51.116	Heritage Estates 2000 Limited	11.10: Policy 6.9	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	Policies 6.1, 6.3, 6.6, 6.7 and 6.9 current wording are opposed where the wording connects in the Plan with predetermined design based on a structure plan/precinct plan dictat[ing] inflexible design solutions.	Accept
S51.117	Heritage Estates 2000 Limited	R11.10.2.1	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	The modified text at bullet point 2: Offensive Activities, Industrial Activities, Crematoria, and Residential Accommodation at Ground Floor Level "and Residential Activities at Ground Floor Level in the Aokautere Neighbourhood Centre" which are Non-Complying Activities" is opposed for the same reasons specified earlier.	Accept
S51.118	Heritage Estates 2000 Limited	R11.10.2.1	Oppose	Why is this level of design control being promoted for Aokautere business where it is at odds with the provisions for the City? Absolute design control affects design innovation and may adversely affect businesses establishing in this location, particularly Franchise businesses. The current signage provisions of the plan often require RC and are suitable to ensure that signage makes a positive contribution to the city.	Oppose: Performance Standards (c) ii Text added "No signs shall be located above the fascia level of a building (see Figure 11.5A), with only one fascia sign per tenancy within the Aokautere Neighbourhood Centre."	Accept in part
S51.119	Heritage Estates 2000 Limited	R11.10.2.1	Oppose		Performance Standards (g) i & ii: Added text "(g) Residential Activities in the Aokautere Neighbourhood Centre (Map 7A.4C): i. No residential activities shall be located at the ground floor level;	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<p>ii. Residential activities shall not be the dominant activity on the site."</p> <p>The nature and scale of business has changed in NZ due to the Covid 19 pandemic and a combination of a ground floor rear flat and ground floor front business should not be excluded. The provisions should restrict business to the street frontage but not exclude residential entirely.</p>	
S51.120	Heritage Estates 2000 Limited	R11.10.2.2	Oppose		R11.10.2.2 performance Standard (a) Maximum Floor Area, iii: Added text "iii. In respect of residential activities in the Aokautere Neighbourhood Centre (Map 7A.4C), a minimum average of 50 dwellings per hectare shall be achieved." This is a prescriptive design outcome and may not be achievable for a variety of reasons, not least that the monotony of form may result, that it may not be supported by the market, may result in cost effective construction and affordability.	Accept
S51.121	Heritage Estates 2000 Limited	R11.10.2.2	Support in part	Height limits the depth to building frontage ratio for natural light into interiors and for energy efficiency.	<p>Performance Standard (b) Building Height, ii:Added text - ii. All other structures must not exceed 9m in height "unless located in the Aokautere Neighbourhood Centre (Map 7A.4C) where structures must not exceed 11m in height".</p> <p>Height limits the depth to building frontage ratio for natural light into interiors and for energy efficiency. More interesting roof forms and inhabitation of the roof space would be more achievable in design with an adjusted height recession arrangement and an increase in height. A control flexibility for extra height of 1m should be examined.</p>	Accept
S51.122	Heritage Estates 2000 Limited	R11.10.2.2	Oppose	The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility	<p>Oppose: Text amendments.</p> <p>d. All buildings "and tenancies" required to</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				for review and updating without a Schedule 1 process.	be built to the front boundary shall provide at least one pedestrian entrance at the street. e. "Within the Aokautere Neighbourhood Centre (Map 7A.4C) all pedestrian entrances shall be provided at the street frontage (excluding service lanes)." A combination of Street Frontage business and rear residential living could provide an excellent design outcome. The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	
S51.123	Heritage Estates 2000 Limited	R11.10.2.2	Support		R11.10.2.2 performance Standard (f) Verandas i. amendment is supported.	Accept
S51.124	Heritage Estates 2000 Limited	R11.10.2.2	Oppose		R11.10.2.2 (f) iv. Is opposed. The latter reads "Within the Aokautere Neighbourhood Centre (Map 7A.4C) lettering shall not dominate the canopy area by being secondary to the veranda." This is a prescriptive design outcome. Why is this level of design control being promoted for Aokautere business where it is at odds with the provisions for signage in other parts of the City?	Accept
S51.125	Heritage Estates 2000 Limited	R11.10.2.2	Oppose	In practice 75% of the height of the ground floor frontage has resulted in endless peer review by PNCC consenting in terms of urban design outcomes. The current rule is inflexible and in practice those seeking consent require a more flexible rule of between 60-75%.	Performance Standard (g) Shop front and Glazing (i) Large Neighbourhood Centres, Small Neighbourhood Centres and Local Stores (and note to plan users): Text amendments bullet point 1: "• All buildings shall have clear glazing for 75% of the height of the ground "primary" floor frontage and for no less than 75% of the ground "primary" floor frontage width. "On corner sites, the proportion of clear glazing on the secondary frontage shall not be less than one third of the secondary	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<p>frontage width. The exception is at the interface with Pacific Drive in the Aokautere Neighbourhood Centre (Map 7A.4C) where all buildings shall have clear glazing for 75% of the ground floor primary and secondary frontage."</p> <p>There is a genuine concern regarding the increased violence in NZ communities and ground floor retail would benefit from the ability to have a greater percentage of solid areas to built-into the frontages at a low level to prevent ram-raids. It is good urban design practice to have visual connection between the exterior and the interior, but the level must include consideration of other matters, such as life safety and property protection of the building users. The addition of text is opposed in the plan.</p>	
S51.126	Heritage Estates 2000 Limited	R11.10.2.2	Oppose		<p>Performance Standard (g) Shop front and Glazing (i) Large Neighbourhood Centres, Small Neighbourhood Centres and Local Stores (and note to plan users): Text amendments bullet point 4 added "Window size, proportion, grouping and/or subdivision of openings should take account of the overall architectural elevation of the building." This affects all Large Neighbourhood Centres, Small Neighbourhood Centres and Local Stores, and is not considered a consequential change of Plan Change G, the change is opposed. Text amendments bullet point 5 added "Fascia shall be sited below the sill of the first-floor windows in the Aokautere Neighbourhood Centre (Map 7A.4C) and must not cross adjoining buildings. (See Figure 11.5A)." This is poorly worded as to the intended design outcome and is again</p>	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<p>prescriptive. Note to plan users added:</p> <p>"For the purposes of R11.10.2.2(g)(i) the primary frontage of a building is the portion of a frontage that serves the main access point to a building or tenancy and faces the principal retail street through the centre, while the secondary frontage is the portion of a frontage facing a lower-order street through the centre and not providing the main access to the building or tenancy".</p>	
S51.127	Heritage Estates 2000 Limited	R11.10.2.2	Neutral		Performance Standard (h) Ground Floor Parking: Text amendment moves this to a subheading point with the same rule.	Accept
S51.128	Heritage Estates 2000 Limited	R11.10.2.2	Oppose		Performance Standard (j) Aokautere Neighbourhood Centre Precinct Plan: Text added at new "(j) Development in the Aokautere Neighbourhood Centre shall be in accordance with the Aokautere Neighbourhood Centre Precinct Plan (Map 7A.4C)" [opposed].	Reject
S51.129	Heritage Estates 2000 Limited	R11.10.3.1	Oppose		Added text "(i) signs" does not appear to be related to PCG and is opposed.	Reject
S51.130	Heritage Estates 2000 Limited	R11.10.3.1	Oppose		Assessment Criteria R11.10.3.1 (e) renaming and addition of R11.10.3.1(h): R11.10.3.1 Assessment Criteria (e) supported. R11.10.3.1 Assessment Criteria (h) wording amendment is opposed.	Accept
S51.131	Heritage Estates 2000 Limited	R11.10.3.2	Oppose		Performance Standard xv. added: Text added, "xv. Consistency with any relevant Precinct Plan or Structure Plan." This text addition is not a consequential change due to PCG and is not on the plan change. This added wording affects Whakaronga, Kikiwhenua, and Whiskey Creek (decision	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					pending) and future greenfield across the city.	
S51.132	Heritage Estates 2000 Limited	R11.10.3.2	Oppose	Text added at these clauses and rules is opposed for the same reasons previously stated.	Performance Standard Assessment Criteria (d) xii added, and (e) iii added and (e) iv added: The wording imposes directive affects all existing and new. Integrating with the existing streetscape and relating to the character of what is physically there can and does result in poor design outcomes. The use of 'avoidance' is unhelpful in the wording.	Accept in part
S51.133	Heritage Estates 2000 Limited	15.3.5: Resource Management Issues	Oppose		Resource Management Issues amended text at Issue 5 as it relates to activities associated with the use of the Recreation, Conservation and Amenity, Racecourse, Water Recreation, and Arena Zones: The text amendment reads: 5. The need to protect "and restore" areas of high amenity, "ecological" and conservation value from inappropriate development." [Oppose]	Reject
S51.134	Heritage Estates 2000 Limited	Whole of Plan Change	Oppose	Private Plan Change for Whiskey Creek has a decision pending. PCG does not explain to the submitter what alterations to the text of the plan result and affected the notified text in the plan as a result of the Whiskey Creek decision if the plan change is granted. The effects of PCG as notified have the potential to adversely affect the Whiskey Creek Plan Change. The s32 does not provide the submitter with clarity.	The submitter takes a precautionary approach and opposes any proposed text in PCG that affects the decision text of the Private Plan Change to Whiskey Creek.	Accept in part
S52.001	Elana Garcia	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	I do not support any loss of the Adderstone Reserve to development. Part of why we moved to this neighbourhood is the access to green space and room to play outdoors with our children. I would be sad to see the loss of the reserve for additional housing or commercial prospects (there is plenty being built across the ravine from us as we speak).	No Rezoning of Aokautere. Please consider an alternative to best meet the needs of our community.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S53.001	Larry Harrison	Structure Plans (General)	Oppose	Promontories - this cluster housing has a build line too close to hill face. Minimum 15 metres from hill face to protect against erosion, visual eyesore and too much housing resulting in stormwater management issues. The habitats in streams and surrounding bush will be at risk through increased stormwater from runoff above valley, which already struggles in a deluge. Too much at stake.	Promontories: D1-D5 rezoning: cluster housing. Maps 7A.4, 7A.4A, 7A.4B, 7A.4D. Stormwater G1-18 Map 7A, pg 32:Minimum 15m setback from hill-face for new builds. Minimum 5000m2 section size to ease water runoff for sections overlooking Moonshine Valley.	Accept in part
S53.002	Larry Harrison	Structure Plans (General)	Oppose	Promontories - this cluster housing has a build line too close to hill face. Minimum 15 metres from hill face to protect against erosion, visual eyesore and too much housing resulting in stormwater management issues.	Promontories: D1-D5 rezoning: cluster housing. Maps 7A.4, 7A.4A, 7A.4B, 7A.4D. Minimum 15m setback from hill-face for new builds. Maximum two storey dwellings. No three storey units.	Accept in part
S54.001	Barry Scott	Whole of Plan Change	Support in part	<p>With a growing population Palmerston North does need to build a lot more houses in the near future but this should be in a sustainable way.</p> <p>While I support urban growth on the unproductive clay soils of Aokautere rather than the fertile, agriculturally productive land north of the city, I am concerned about the degree of intensification proposed. The level of intensification is at a level never seen before in the city on land that is quite distant from the city and above bush reserves that are of high ecological and recreational value.</p>	Reduction in number and size of sections in this subdivision.	Reject
S54.002	Barry Scott	General - Stormwater, erosion and flooding	Oppose	With climate change we are seeing a dramatic increase in both the intensity and frequency of flooding in the Manawatu and throughout New Zealand. When we moved to Moonshine Valley in 1994 the Mangaotane stream (Bryant's stream) would flood every two to three years. Now it floods several times each year with a dramatic increase in erosion of the banks and deposition of sediment in the stream. One only need to walk into the entrance of Moonshine Valley Reserve to	<ol style="list-style-type: none"> Section boundaries should be at least 15 m back from the edge of the gullies as in the Turitea Valley not 5 m. The proposed ponds to capture the water appear to be too few and not large enough in size to really capture large volumes of water in storm events The size of sections close to the edge of the gullies is too small. 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>see the huge impact of this increased flooding. This valley is a microcosm of what is happening in all the streams and tributaries that flow into the Manawatu river.</p> <p>The increased sedimentation in the last few years has been exacerbated by the housing developments occurring on the surrounding land that drains through gullies into Mangaotane stream. The stream has Koura (freshwater crayfish), Kakahi (freshwater mussels), Giant Kokopu and Longfin eel.</p> <p>My greatest concern with the proposed Aokautere Urban Growth Plan is the impact of storm water run-off into Moonshine Valley Special Area and the impact on the land and the stream. Urban development brings with it a significant increase in concrete and asphalt surfaces with increased water run-off in storm events. While the proposed plan includes mitigation strategies these seem seriously inadequate.</p>	4.	Land overlooking Moonshine Valley should be retained as Rural-Residential zoning.	
FS18.024	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	Accept in part	That the submission is accepted	Accept in part
S54.003	Barry Scott	Whole of Plan Change	Oppose	The plan envisages a build of around 1050 new dwellings in a mixture of single through to three-storey houses at a density lower than any of the built-up areas within the city. While intensification of housing in the central part of a city is desirable	Reduction in number and size of sections in this subdivision.		Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>to create a vibrant and sustainable city doing this on the outskirts of the city is moving in an unsustainable direction:</p> <ul style="list-style-type: none"> - There will be a dramatic increase in car trips per day along Aokautere and Summerhill Drives into the city and put huge traffic pressure on Fitzherbert Avenue. - The distance (6-9km) from the heart of the city for much of the proposed development would make it one of the most car-dependent suburbs in the city. - More car traffic will increase CO2 emissions for the city, which is counter to the current sustainability goal of PNCC. - While the plan includes arteries for public bus transport unless the service is frequent, relatively cheap and convenient to use, residents will take the easy option of private car usage as they already do throughout much of the city. - Housing intensification at this level on the outskirts of the city is going to increase our greenhouse gas emissions when we should be moving to decrease them. - The plan is counter to the sustainability goals of He Rautaki Tāone Tautaiāo Eco City Strategy 2021-2031. 		
S54.004	Barry Scott	General - Traffic and transport	Support in part	For those choosing to use a cycle as a transport option the increase in traffic will pose a greater risk to safety.	Reduction in number and size of sections in this subdivision.	Reject
S55.001	Christine Scott	Whole of Plan Change	Support in part		I acknowledge that Palmerston North does need to build new houses in the near future and that using the less unproductive land in the Aokautere area is a better alternative than using good agricultural land. However more thought needs to be given to higher traffic flow, water run off and recreation areas.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S55.002	Christine Scott	General - Stormwater, erosion and flooding	Oppose	<p>My main concern with the proposed 1000 plus housing development is the huge number of homes crammed into the area with a resulting increase in water runoff into the gullies. There does not seem to be any proposal to link storm water to the existing city storm water system. Ground area into which rain water can be absorbed will be significantly decreased. If, for arguments sake, the area covered by houses, driveways, streets etc, covers 25% of the proposed development area (a very conservative estimate), this must result in approximately 25% increase in the amount of water running down into the gullies. The gullies may be able to handle this under a normal rain fall but increasingly, with climate change, rain events are becoming much more extreme with huge increases in volumes of water discharged down the gullies and into the Moonshine valley stream. In the past month we have had 3 Moonshine valley floods where water has covered the bottom of our section, flowed through our chook house and water covering our little bridge (which is approx. 1.5m above the level of the stream) by half a metre. We have lived here 25 years and until the last 2 or 3 years we have had less than half a dozen floods go over our land and prior to this year we have only had water go through our chook house 2 or 3 times.</p> <p>This last year has also seen a big increase in the amount of slumping and slips along the Moonshine Valley stream with a huge slip coming down in the Moonshine Reserve opposite our property. A few years ago it was easy to walk up the Moonshine Reserve, jumping the stream as it wound its way down but this has now been eroded away making it very difficult to cross each bend in the stream, plus there has been a huge slip come down on the right not far from the entrance to the reserve. The edge of the Moonshine Stream</p>	A change in size and number of sections to be included in this subdivision.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>has slumped badly in the Tutukiwi Reserve resulting in closure of the road into the carpark plus there have been large hunks of the bank removed in the grass reserve. There has also been a huge increase in the amount of silt come down the creek with all the housing that has gone in off Pacific Drive. Putting in ponds will have little effect in heavy rainfall events.</p> <p>The increase in housing off Pacific Drive is minor compared to what is proposed in this current 'Urban Growth Plan'. Yet we are already seeing the impact of the development that has occurred over the last 2-3 years. It is of great concern that the impact of the proposed development will be even greater, having a substantial negative impact on properties bordering the Moonshine stream and the gullies that run into Moonshine Valley.</p>			
FS18.025	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	Accept in part	That the submission is accepted	Accept in part
S55.003	Christine Scott	General - Traffic and transport	Oppose	<p>Already it is becoming increasingly difficult to merge onto Aokautere Drive from Pacific Drive, Johnstone drive, Cashmere Drive, etc plus increasingly dangerous for cyclists. Plus there is only one bridge over the manawatu river which services the Aokautere community.</p>	More thought needs to be given to traffic management, cycle lanes and bus services.		Accept
S56.001	Paul and Jan Dixon	Structure Plan: Map 7A.4E	Not Stated	<p>We understand the need to plan for future growth of the city but fear that the current proposal will increase dramatically the traffic on Turitea Road</p>	That any future development in the Aokautere/Turitea area does not erode this important leisure area.		Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
		Adderstone Reserve Option		thereby equally dramatically decreasing the amenity value of Turitea Rd. This road is currently heavily utilised by runners, walkers, cyclists and horseriders.....PN is indeed fortunate to have such a space so close to the city centre. It will be of even greater value to future generations.	Further, that PNCC considers developing high-density housing nearer to the city rather than sprawling dev. over farm land.	
S56.002	Paul and Jan Dixon	Whole of Plan Change	Neutral	My husband and I understand the need to plan for future growth of the city but fear that the current proposal will destroy some valuable city assets, valuable now but even more so for future generations.	That PNCC considers developing high-density housing nearer to the city rather than sprawling dev. over farm land.	Reject
S57.001	Sport Manawatū	General - Traffic and transport	Oppose	<p>The proposed development will increase traffic and risk to people using active transport. The recommended mitigation does not provide separated cycle lanes from a busy state highway and so will not reverse the current trend of declining numbers of cyclists. The recommendations to insert more roundabouts will further increase risk to cyclists as roundabouts are the most dangerous type of intersection for cyclists.</p> <p>The proposed development should not go ahead until there is construction of a separated cycling route connecting Johnstone Drive and Pacific Drive to Fitzherbert Bridge; and a school travel route to the new school (being planned for near to Peren Park). The new houses will generate more traffic and make this area even less attractive to people using active travel.</p> <p>Improved active-transport Infrastructure for the suburbs near Summerhill and Aokautere Drives is needed as numbers cycling in Palmerston North are declining despite Council aspirations to the contrary. The proposed increase in houses will just increase car traffic and reinforce existing barriers to less carbon-intensive transport unless Council decides to prioritise transport other than</p>	<p>We seek amendments to the proposed development, namely that before the new development is started:</p> <ol style="list-style-type: none"> 1. A separated cycle route is developed that connects: <ol style="list-style-type: none"> 1. Johnstone Drive with Pacific Drive (shared path as proposed) 2. Separated cycle for Pacific Drive (only a painted lane proposed) 3. Separated path from Pacific Drive to Fitzherbert Bridge 4. No roundabouts built on cycle route. 2. Infrastructure is developed to enable children to safely walk and cycle to the new school proposed for Peren Park (as we understand it is about to be built). 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				cars. Increasing bus frequency requires extra passengers - otherwise the buses are just adding to congestion. As the traffic assessment notes the usage of buses is unlikely to change without changes to parking but much of parking in Palmerston North is under private control and very cheap when compared to other cities.		
FS16.002	Waka Kotahi NZ Transport Agency		Support	Waka Kotahi seeks better integration and provision for public transport and active modes of transport prior to development, connecting the growth area with city centre, schools and nearby amenities. Waka Kotahi seeks to be involved in regard to any proposals relating to active and public transport.	Accept in part Waka Kotahi seeks this submission is allowed.	Accept in part
S57.002	Sport Manawātū	General - Traffic and transport	Oppose	<p>The planned provision for cyclists does not meet best practice guidelines. TCD Manual Part 5 will provide details regarding the widths required for wide and narrow transit lanes. In the interim, New Zealand best practice is to provide transit lanes wide enough for cyclists to ride adjacent to motor vehicles, ie 4.2 m or wider [see cited reference in original submission].</p> <p>But Urban Connector A only requires a space of 3.9 metres and limits the cycle land to 1.8 metres wide. Urban Connector B provides 2.3 metres for the parked car but only 1.8 metres for the cyclists which is the NZTA "desirable minimum length" [see cited reference in submission] but is not good practice.</p> <p>Notes that Wellington requires a much wider space for car parks (and so wonder why much narrower widths are used in Palmerston North) - "Car parks on road reserve must be at least 3m wide and 6m long" [cites reference].</p>	<p>We agree with the Transportation Assessment that the new development should not go ahead until new active transport infrastructure is in place to provide safe access from this area to the CBD but believe infrastructure of a higher standard is required. Accordingly, we recommend a separated cycle route is developed that connects:</p> <ol style="list-style-type: none"> 1. Johnstone Drive with Pacific Drive (shared path as proposed); 2. Separated cycle for Pacific Drive (an upgrade from the painted proposed lane); 3. Separated path from Pacific Drive to Fitzherbert Bridge; and 4. No roundabouts built on cycle route. 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				<p>The provision of a narrow cycle lane will not encourage more cyclists onto the road, as these roads are either busy or connect to a State Highway which is busy and so will only appeal to enthused and confident riders.</p> <p>The standard of cycle lanes needs to be more than a painted lane and a bit of space on the side of the road if more people are going to be encouraged to cycle [cites various references].</p>			
FS16.003	Waka Kotahi NZ Transport Agency		Support	Waka Kotahi seeks better integration and provision for public transport and active modes of transport prior to development, connecting the growth area with city centre, schools and nearby amenities. Waka Kotahi seeks to be involved in regard to any proposals relating to active and public transport.	Accept in part	Waka Kotahi seeks this submission is allowed.	Accept in part
S57.004	Sport Manawātū	General - Traffic and transport	Oppose	<p>Safety concerns: Building cycle lanes will not work if there remain dangerous parts on the cycle route. The Transportation Assessment reports finds 24 crashes in the last five years of which three involved cyclists (page 16). The Transportation report conflates active transport to work (page 22) which is not statistically valid as pedestrian and cyclist injury trends differ and no injury noted in the report involves a pedestrian.</p> <p>Analysis of the census and crash data indicates there is extra risk for cyclists [see original submission for details].</p> <p>These intersections will get busier and more complicated with the increasing traffic generated by new houses thereby increasing the real and perceived risk of cycling in this area. This will be made worse when intersections are modified to make travel easier for cars (as extra lanes are built to accommodate greater traffic).</p>	<p>We agree with the Transportation Assessment that the new development should not go ahead until new active transport infrastructure is in place to provide safe access from this area to the CBD but believe infrastructure of a higher standard is required.</p> <p>Accordingly, we recommend a separated cycle route is developed that connects:</p> <ol style="list-style-type: none"> 1. Johnstone Drive with Pacific Drive (shared path as proposed); 2. Separated cycle for Pacific Drive (an upgrade from the painted proposed lane); 3. Separated path from Pacific Drive to Fitzherbert Bridge; and 4. No roundabouts built on cycle route. 	Accept in part	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>NZTA guidance [ref in original submission] notes that roundabouts have the highest risk per cyclist.</p> <p>We therefore oppose any roundabouts being built on this route unless cyclists have a separated route to avoid the roundabout and that does not require more effort to use (as cyclists are lazy and will take the easiest route).</p> <p>Building active-travel infrastructure prior to the new development will save money. Creating a cycle route that attracts more users is likely to be expensive when the work changes existing infrastructure.</p>		
S57.005	Sport Manawatū	General - Traffic and transport	Oppose	<p>New school transport infrastructure required</p> <p>The transportation assessment makes no mention of the new school that is to be built in Aokautere. With the extra traffic and high speeds of Aokautere and Summerhill Drives, it is unlikely that many if any children will walk, scooter or cycle to school. But traffic accessing Ruapehu Drive and the school will create further congestion and risk for pedestrians and cyclists. We therefore recommend that a new study is done to determine the impact of the new school on traffic and likely further impacts once the new subdivisions are in place.</p> <p>From a health perspective, it seems wrong that children are unable to safely walk to school but crossing roads with 60 and 70 kmh speed limits surely makes this impossible. We would recommend that the speed limit should be reduced to 30kmh (perhaps only at school-travel times) for crossings on Aokautere and Summerhill Drives where these enable children to get to school; and at the intersections of Ruapehu Drive with Aokautere and Summerhill Drives.</p>	Infrastructure is developed to enable children to safely walk and cycle to the new school proposed for Peren Park (as we understand it is about to be built).	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
FS16.004	Waka Kotahi NZ Transport Agency		Support	Waka Kotahi seeks better integration and provision for public transport and active modes of transport prior to development, connecting the growth area with city centre, schools and nearby amenities. Waka Kotahi seeks to be involved in regard to any proposals relating to active and public transport.	Accept	Waka Kotahi seeks this submission is allowed.	Accept
S58.001	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	General - No specific provision referenced	Oppose	<p>Plan Change G relates largely to land already zoned for urban development either residential or rural residential but extends that area to the east and south. In that respect it is not a new "Greenfield Residential Area".</p> <p>The Plan Change seeks to impose a specific design solution on the development of the area without any evidence on the market demand for different forms of housing in this location compared to other City locations or the economic feasibility of the design proposed.</p> <p>In some locations land is actually down zoned from Residential to Conservation and Amenity without any detailed s32 evaluation of that change.</p> <p>The Plan Change represents a major shift from enabling development which is then designed by applicants and tested through the resource consent process to directing and imposing a specific design solution with little flexibility to adapt to market demands and detailed design.</p> <p>This is implemented by way for what is termed a "Structure Plan". The submitters consider that what is proposed to be included in the Plan is not a structure plan but is in fact a detailed design master plan.</p> <p>A Structure Plan is a broad framework to guide the development or redevelopment of an area by</p>	The submitters position is that a joint process should have been in place with the major landowners at the outset and a partnership process implemented to ensure that agreement was reached on feasible staged development ahead of notification of this Plan Change.		Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>defining land use patterns and the nature and indicative location of required infrastructure including important transportation links. The District Plan already includes Structure Plans for the existing Greenfield Residential Areas of Whakarongo and Kikiwhenua that are in accord with this indicative approach.</p> <p>This contrasts dramatically with what is proposed to be included in the District Plan through this Plan Change which shows every proposed residential lot, defined open space and neighbourhood centre site required to be in accordance with the Plan Change.</p> <p>What is even more concerning is that this approach is being imposed on the area without ensuring that the design visions and commercial objectives of the landowners/ developers who are required to fund and implement the development have been incorporated and an agreed design response advanced. This is despite a period of three years working on this Plan Change.</p>			
FS16.011	Waka Kotahi NZ Transport Agency		Oppose	<p>Removing the requirement for subdivision and development to provide for an accessible, safe and efficient transport network that is well planned and in accordance with a structure plan.</p> <p>Should Plan Change G proceed it is essential that appropriate transport infrastructure is required to be provided prior to development.</p>	Accept	Waka Kotahi seeks these submissions are disallowed	Accept
FS18.003	Heritage Estates 2000 Ltd		Support	The submitter agrees that PC-G seeks to impose a specific design solution through its Structure Plan and that such an imposition is unnecessary.	Reject	That the submission is accepted.	Reject
S58.002	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Section 32 Report: Appendix 12: Aokautere	Oppose	Concerns regarding this process have previously been expressed to Council officers. Fundamentally if the landowner developer is not satisfied that a design matches market demand and is economically feasible then the financial risk will	The submitters oppose the neighbourhood centre being a mandatory requirement. The submitter also opposes the extent of medium density residential being directed by the Plan Change.		Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
		Centre Retail Report		<p>not be taken and no development will occur until the conditions are suitable.</p> <p>This is well illustrated by the direction to deliver a neighbourhood centre in accordance with the detailed concept on Map 7A. In the limited engagement that has occurred the submitters have expressed concern about the feasibility of this neighbourhood centre.</p> <p>The issue is tested in the report for the Plan Change by Urbacity. This clearly states that to be successful and viable early in the development process the centre needs to be on Pacific Drive so that it is highly accessible to existing residential areas. The submitters agree with that position. Where it is proposed to be located will not be successful because, as Urbacity clearly state, the number of households necessary to enable the centre requires a high level of medium density but the medium density is unlikely to be successful without the early development of the centre. He recommends that the Council acquire land is the right location for the centre, being on Pacific Drive and tender out the construction and leasing of the centre.</p>	The submitters agree with Urbanity's expert advice on the neighbourhood centre and the location of the centre should be relocated so that it is all on Pacific Drive and not just the corner of one site as currently proposed.		
FS18.004	Heritage Estates 2000 Ltd		Support	The submitter agrees that PC-G seeks to impose a specific design solution through its Structure Plan and that such an imposition is unnecessary.	Reject	That the submission is accepted.	Reject
S58.003	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	General - No specific provision referenced	Oppose	The submission should have been a submission wholeheartedly in support of the Plan Change but that is regrettably not the case. Concerns regarding this process have previously been expressed to Council officers. Fundamentally if the landowner developer is not satisfied that a design matches market demand and is economically feasible then the financial risk will not be taken and no development will occur until the conditions are suitable.	The submitters position is that a joint process should have been in place with the major landowners at the outset and a partnership process implemented to ensure that agreement was reached on feasible staged development ahead of notification of this Plan Change.		Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>[This is] illustrated by the last minute changes to accommodate the proposed retirement village within the Structure Plan just prior to notification of the Plan Change. This is despite the Council being fully aware of this proposal for more than 12 months and in that time being directly involved in the Ministry for the Environment led process to determine and application for project consents through the COVID 19 Fast Track Consenting Act.</p> <p>The Section 32 evaluation claims to have engaged with the key landowners at various stages of the process but then states at para 108, "There remains an element of risk around landowner reaction to elements of the Structure Plan approach ". The submitters concur with that statement.</p>			
FS18.005	Heritage Estates 2000 Ltd		Support	The submitter agrees that PC-G seeks to impose a specific design solution through its Structure Plan and that such an imposition is unnecessary.	Reject	That the submission is accepted.	Reject
S58.004	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Section 32 Report - Appendix 11: Stormwater Management Strategy	Oppose	<p>The submitters are very concerned to find fundamental errors in some of the supporting technical reports that underpin the Plan Change.</p> <p>The Stormwater and Geotechnical reports and the Proposed Zone Plan Map show the Aokautere Church Stream extending through the North Village site to the existing residential area to the south east. In some reports this is also shown as an existing gully.</p> <p>This is incorrect, there is no stream in this location and no gully. The gully was consented and filled in 2007/8 although the work was not fully completed.</p> <p>This appears to have triggered a proposed wetland area at the heart of this residential</p>	The proposed wetland area at the heart of this residential environment on the terrace is opposed. It is not necessary to commit valuable development or open space area to wetland when there are ample other options including gully wetland treatment and rain gardens.		Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				<p>environment on the terrace. This is opposed.</p> <p>It is not necessary to commit valuable development or open space area to wetland when there are ample other options including gully wetland treatment and rain gardens. Such an approach has been specifically opposed by Council itself in other cases. Further the GHD report does not recommend this option it just raises it as a possible option.</p>			
FS18.032	Heritage Estates 2000 Ltd		Support	<p>Fundamental errors in some of the supporting technical reports that underpin the plan change. The effects of PCG cannot be quantified in the notified documents. The reports do not contain sufficient base information to enable the submitter to brief and engage a stormwater expert to peer review, the effects of stormwater are interrelated with erosion, Geotech and ecology/planting</p>	Reject	That the submission is accepted	Reject
S58.005	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Structure Plans (General)	Support in part	<p>Gully stormwater detention is supported however the main location for this for the North Village area will be immediately behind the new gully crossing which combines efficient access connection with designed detention.</p>	<p>Any structure plan should be amended to show this location for the detention. The broad location for this gully crossing is supported but the alignment shown is opposed. This matter is currently being addressed through LU6299 which provides for a gully road crossing and stormwater detention. The crossing of Gully G3 shown as "E" is also opposed as it is unlikely to be economically viable and other alternatives should be considered.</p>		Reject
S58.006	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Map 10.1A	Oppose	<p>The submitters are opposed to the retention of Map 10.1 which is superseded by Map 10.1A and should be removed as it is out of date and effectively replaced.</p>	Remove Map 10.1.		Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S58.007	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Structure Plan: Map 7A.4	Support in part	The provision for a retirement village within the structure plan is supported in principle.	The site area should extend southeast to the existing residential edge. The Structure Plan seeks a road access connection through 153 Pacific Drive. This is possible but will likely be secondary access to the retirement village only.	Accept
S58.008	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	General - Multi-unit residential development	Oppose	The extent of medium density or multi-unit residential housing area is opposed.	The quantum of medium density needs to match a careful assessment of market demand which should have been undertaken at the outset of this project. The promontory clusters also need to be tested as to feasibility given the road access development costs to these sites.	Reject
S58.009	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Structure Plan: Map 7A.4	Oppose		The proposed gully edge road to Gully G3 is opposed in terms of the extent of undeveloped road frontage. A more nuanced approach is required that provides access to the gully with viewing points at that location and some breaks in the built form along this edge.	Accept in part
FS18.035	Heritage Estates 2000 Ltd		Support	These submission points are in oppose elements of the Structure Plan and Zoning Maps based. The submitter is opposed to a specific design solution being imposed through its Structure Plan without flexibility to respond if the effects PCG generates are different in nature to those envisaged by the masterplan process/structure plan - without a Schedule 1 RMA process.	Accept in part That the submission is accepted	Accept in part
S58.010	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Structure Plan: Map 7A.4	Support in part		The structure plan includes a connection from Abby Road to Johnstone Drive across Gully 10. That connection has already been the subject of a Notice of Requirement to designate the work and is supported in principle.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S58.011	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Zoning Maps	Oppose	The submitters oppose the change from residential zoning to Conservation and Amenity Zone of the area of land immediately south of the gully crossing [connection from Abby Road to Johnstone Drive across Gully 10]. This area of land has been previously partly filled and has no particular natural or amenity values.	This land should be left as Residential Zone and its development enabled.	Reject
S58.012	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R10.7.4	Oppose	A number of the design criteria are inappropriate for the environments that a retirement village will seek to create, nor are the prerequisite transport requirements necessary in all circumstances. Furthermore, it is apparent that these criteria are sought to apply to all Greenfield Residential Areas which parties with an interest of the other areas are unlikely to be aware of.	The submitters oppose the added Assessment Criteria for Retirement Villages and Residential Centre added in at R 10.7.4 (k).	Accept in part
FS16.015	Waka Kotahi NZ Transport Agency		Oppose	The requirement for assessment criteria for Retirement Villages and Residential Centres. Should Plan Change G proceed it is essential that appropriate transport infrastructure is required provided prior to development. This will support a well-functioning urban environment, provision for active and public transport modes and safety and efficiency of the transport system.	Accept in part Waka Kotahi seeks this submission is disallowed.	Accept in part
S58.013	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R10.7.5.3	Oppose		The submitters oppose the requirement for transport network improvements before any subdivision and also the proposed Non Complying activity rules including R10.7.5.3.	Accept in part
S58.014	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 4.6	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S58.015	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 4.8	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.016	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 4.9	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.017	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Objective 5	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.018	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 5.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.019	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 5.3	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the	[No specific relief sought]	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				Plan Change and this has widespread implications for the Plan provisions.			
S58.020	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 5.4	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]		Accept in part
S58.021	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 5.5	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]		Accept in part
S58.022	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 5.8	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]		Accept in part
S58.023	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 5.9	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]		Accept in part
FS16.014	Waka Kotahi NZ Transport Agency		Oppose	Policy 5.9 aims to avoid subdivision and development occurring in advance of the availability of operational transport	Accept in part	Waka Kotahi seeks this submission is disallowed	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>infrastructure. Opposed to the removal of this clause.</p> <p>Should Plan Change G proceed it is essential that appropriate transport infrastructure is required to be provided prior to development.</p>		
S58.024	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 5.15	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept
S58.025	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A: Policy 6.6	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.026	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	7A:4 Methods	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.027	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R7A.5.2.2	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the	[No specific relief sought]	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				Plan Change and this has widespread implications for the Plan provisions.		
S58.028	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R7A.5.2.3	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.029	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R7A.5.5.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.030	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	10: Objective 15	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.031	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	10: Policy 15.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.032	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	10: Policy 15.11	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of	[No specific relief sought]	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.		
S58.033	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	10.4: Methods	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.034	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R10.6.1.5	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.035	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R10.6.3.2	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.036	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R10.6.3.3	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S58.037	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R10.7.4	Oppose	10.7.4.6: All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.038	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R10.7.5.3	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept
S58.039	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11.10: Objective 6	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.040	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11.10: Policy 6.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.041	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11.10: Policy 6.2	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters	[No specific relief sought]	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.		
S58.042	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11.10: Policy 6.3	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.043	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11:10: Policy 6.4	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept
S58.044	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11:10: Policy 6.5	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.045	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11.10: Policy 6.6	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S58.046	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11.10: Policy 6.7	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.047	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11:10: Policy 6.8	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.048	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	11.10: Policy 6.9	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept
S58.049	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R11.10.2.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.050	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R11.10.2.2	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the	[No specific relief sought]	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				Plan Change and this has widespread implications for the Plan provisions.		
S58.051	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R11.10.3.2	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.052	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R11.10.5	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Accept in part
S58.053	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	15:5: Policy 1.5	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.054	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R15.5.4.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought]	Reject
S58.055	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R15.5.6.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of	[No specific relief sought]	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.			
S58.056	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	R15.5.5.1	Oppose	All the submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	[No specific relief sought].	Reject	
S58.057	CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.	Whole of Plan Change	Oppose	<p>The Plan Change seeks to impose a specific design solution on the development of the area without any evidence on the market demand for different forms of housing in this location compared to other City locations or the economic feasibility of the design proposed.</p> <p>The Plan Change represents a major shift from enabling development which is then designed by applicants and tested through the resource consent process to directing and imposing a specific design solution with little flexibility to adapt to market demands and detailed design.</p>	All the submission points [see full submission and other submission points] all have implications for the objectives, policies and rule framework for the area. The submitters oppose all aspects of the Plan provisions that are not consistent with the submission points. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.	Accept in part	
FS18.006	Heritage Estates 2000 Ltd		Support	The submitter agrees that PC-G seeks to impose a specific design solution through its Structure Plan and that such an imposition is unnecessary.	Accept in part	That the submission is accepted.	Accept in part
S59.001	Transpower NZ Ltd	General - No specific provision referenced	Neutral	Of specific interest to the Aokautere Urban Growth area is the Bunnythorpe-Wilton line, being 220kV transmission lines forming the National Grid located centrally through the site, as broadly shown in Figure 1 [see full submission]. Transpower's assets (and their ability to be operated, maintained and developed) are essential to achieving development and growth, including	<p>Given the national significance of the National Grid and the policy direction set by the NPSET, Transpower seeks:</p> <ol style="list-style-type: none"> 1. That the NPSET is referenced in the Aokautere Urban Growth area documents, given the potential 	Accept in part	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>that anticipated for the Aokautere Urban Growth area.</p> <p>The need to operate, maintain, upgrade and develop the National Grid is a matter of national significance that is recognised in an RMA context by the National Policy Statement on Electricity Transmission 2008 ("NPSET").</p> <p>Of relevance to the Aokautere Urban Growth area, the NPSET recognises that ongoing investment in the National Grid and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.</p> <p>Policies 10 and 11 of the NPSET provide direction that is directly relevant to the scope of the Growth area in relation to reverse sensitivity effects and buffer corridors. Policies 10 and 11 of the NPSET have been given effect to in the District Plan with provisions that regulate land use and development in a buffer corridor near the National Grid (particularly within Section 23: Network Utilities.</p> <p>Transpower is generally neutral with regard to the principle of urban growth in the area. However, under the NPSET and the Operative District Plan, it is a matter of national significance that the operation, maintenance, upgrading and development of the National Grid is protected. Any growth or intensification close to the National Grid needs to be carefully considered taking into account the development constraints established by the District Plan in relation to the Bunnythorpe-Wilton transmission lines.</p> <p>There is existing pressure to allow for development close to the National Grid, any</p>	<p>constraints that the National Grid may have on areas for urban growth; and</p> <ol style="list-style-type: none"> 2. Given the level of development detail indicated by the Structure Plans for the area, Transpower strongly recommends that Council carefully assesses the extent to which residential development may be constrained with reference to the National Grid Yard rules in the operative District Plan Sections 6 and 7 and any new provisions that will be required for the relevant residential sections (as required by the National Grid Yard setbacks) and factor this in to the growth. 3. Amend Plan Change G to include specific provisions in relation to the National Grid, including the requirement to consult with Transpower for any subdivision within the 39m National Grid Subdivision Corridor (39m on either site) and for any land use structures within the 12m National Grid Yard (12m on either side) . These should be specific to the new zone to avoid any potential confusion as to if they apply. Any subdivision in this area is regulated by restricted discretionary activity status and is subject to a number of assessment criteria. Usually this requires consultation with Transpower, and Transpower's written approval will be required for subdivisions in this area. 4. Any new dwelling or sensitive activity within the National Grid 	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>increase in potential density or development in these areas will add more pressure for people wanting to develop, under and near high voltage transmission lines and structures.</p> <p>It is critical that any development near the National Grid occurs in an appropriate and safe way, and this needs to be factored in at the growth development level. The framework established by the Operative District Plan National Grid Corridor provisions allow for this careful management to occur. This will ensure risks such as electric shocks are minimised to the greatest extent possible, access for vital maintenance and upgrade work is not constrained and reverse sensitivity effects are avoided, ensuring the infrastructure can continue to operate in the long term.</p> <p>Transpower prefers, wherever possible, to manage risks proactively. Proactive management through appropriate planning provisions such as zoning and rules for the National Grid corridor is the most effective way of ensuring development occurs in a manner that is compatible with the National Grid and gives effect to the NPSET.</p> <p>Consistent with the Operative District Plan provisions, the National Grid corridor needs to be identified as constraint, particularly in relation to residential development. The current documents and plans for urban growth areas do not show the National Grid and therefore it is unclear whether the National Grid has been taken into account.</p> <p>In specific regards to the Aokautere Urban Growth area is the two Bunnythorpe-Wilton lines, being 220kV transmission lines through the growth area. As these are double circuit steel towers lines the "National Grid Yard setback" from the outer edge of any National Grid support structure is 12m and 12m from either side of the centerline of</p>	<p>Yard setbacks (12m on either side) should a non-complying activity.</p> <ol style="list-style-type: none"> 5. The zone provisions and the maps need to be very clear that the National Grid is partly located within the area and that it is important that Transpower's need to operate, maintain, upgrade and develop the National Grid is a matter of national significance (recognised by the NPSET). 6. The section 32 report will need to be updated to include the National Grid and what provisions should be included to address the impact on development. 7. Plans and provisions of the new zone will need to show the National Grid, as a potential constraint for growth. <p>Transpower seeks that the Aokautere Urban Growth area is amended as set out above, or other such relief to achieve the same outcome, and that such recommendations are adopted in the final growth area.</p>	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>the overhead National Grid line. Any new dwelling or sensitive activity within these setbacks should a non-complying activity.</p> <p>In addition, a National Grid Subdivision Corridor of 37m on either side of the centerline of the above ground National Grid line will apply. Any subdivision in this area is regulated by restricted discretionary activity status and is subject to a number of assessment criteria. Usually this requires consultation with Transpower, and Transpower's written approval will be required for subdivisions in this area.</p> <p>A number of recent dwellings have been constructed in close proximity to the National Grid, there appears to have been limited consultation with Transpower, either as part of the subdivision process or land use for construction of the dwellings. The corridor is less than the National Grid Yard setback requirements along Pacific Drive [see photo provided].</p> <p>Transpower is generally supportive of the approach in the Aokautere Urban Growth area to enable sustainable managed growth. However, the section 32 report will need to be updated to include the National Grid and what provisions should be included to address the impact on development. Additionally plans and provisions of the new zone will need to show the National Grid, as a potential constraint for growth.</p>		
S59.002	Transpower NZ Ltd	Zoning Maps	Neutral	<p>Of specific interest to the Aokautere Urban Growth area is the Bunnythorpe-Wilton line, being 220kV transmission lines forming the National Grid located centrally through the site, as broadly shown in Figure 1 [see full submission]. Transpower's assets (and their ability to be operated, maintained and developed) are essential to achieving development and growth, including</p>	<p>Given the national significance of the National Grid and the policy direction set by the NPSET, Transpower seeks:</p> <ol style="list-style-type: none"> 1. That the Aokautere Urban Growth area identifies the National Grid transmission lines on the relevant maps; 	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>that anticipated for the Aokautere Urban Growth area.</p> <p>The need to operate, maintain, upgrade and develop the National Grid is a matter of national significance that is recognised in an RMA context by the National Policy Statement on Electricity Transmission 2008 ("NPSET").</p> <p>Policies 10 and 11 of the NPSET provide direction that is directly relevant to the scope of the Growth area in relation to reverse sensitivity effects and buffer corridors. Policies 10 and 11 of the NPSET have been given effect to in the District Plan with provisions that regulate land use and development in a buffer corridor near the National Grid (particularly within Section 23: Network Utilities).</p> <p>The National Grid corridor needs to be identified as constraint, particularly in relation to residential development. The current documents and plans do not show the National Grid and therefore it is unclear whether the National Grid has been taken into account.</p> <p>In specific regards to the Aokautere Urban Growth area is the two Bunnythorpe-Wilton lines, being 220kV transmission lines through the growth area. As these are double circuit steel towers lines the "National Grid Yard setback" from the outer edge of any National Grid support structure is 12m and 12m from either side of the centerline of the overhead National Grid line.</p> <p>In addition, a National Grid Subdivision Corridor of 37m on either side of the centerline of the above ground National Grid line will apply.</p>	<p>2. The zone provisions and the maps need to be very clear that the National Grid is partly located within the area and that it is important that Transpower's need to operate, maintain, upgrade and develop the National Grid is a matter of national significance (recognised by the NPSET).</p> <p>3. Plans of the new zone will need to show the National Grid, as a potential constraint for growth.</p> <p>Transpower seeks that the Aokautere Urban Growth area is amended as set out above, or other such relief to achieve the same outcome, and that such recommendations are adopted in the final growth area.</p>	
S60.001	Horizons Regional Council	Whole of Plan Change	Support in part	Horizons generally supports plan changes to provide for growth that have as their basis a structure plan and that align with urban growth	Our submission seeks to ensure the proposed plan change also addresses our	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				strategic planning by the territorial authority. 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 infrastructure with land use.	concerns as the regional authority for the affected area.		
FS18.007	Heritage Estates 2000 Ltd		Support in part	The submitter agrees that the plan change aligns with the Council's strategic growth areas signalled in non-statutory documents in the sense that this gives effect to the One Plan Objective 3-3 and Policy 3-4, however, the submitter disagrees that (and opposes) the structure plan as notified achieves One Plan Objective 3-3 and Policy 3-4 without modification.	Accept	That PCG enables alternatives and modified outcomes to the notified structure plan through the wording of the plan where integrated infrastructure is demonstrated to achieve a similar outcome.	Accept
S60.002	Horizons Regional Council	General - Stormwater, erosion and flooding	Support in part	<p>There are a number of waterways, ephemerals and overland flow paths within this area. Palmerston North City Rapid 0.5% (1 in 200 year) Annual Exceedance Probability flood modelling has been undertaken to indicate water depths. As the flood modelling is Palmerston North City Council's (PNCC's) information and not that of Horizons, we cannot comment on its accuracy with respect to the flood risk. However, we note that the modelling shows that most of the modelled flood risk is within or near the waterways and within the gully system.</p> <p>Horizons One Plan Policy 9-2 (Development in areas prone to flooding) generally discourages new habitable buildings or extensions to existing habitable buildings in areas that are likely to be inundated during a 0.5% AEP (1 in 200 year) flood event. However, where flood hazard avoidance can be achieved the activity may occur. Where the flood hazard cannot be avoided, Policy 9-2 states that the risk must be mitigated.</p>	Horizons seeks provision for flood management that gives effect to One Plan Policy 9-2.		Accept
FS16.001	Waka Kotahi NZ Transport Agency		Support	Waka Kotahi supports the effective management of flood hazards and if the plan change proceeds that there is an integrated approach to managing stormwater and flood hazards that considers the	Accept	Waka Kotahi seeks that this submission point be allowed and should the plan change proceed that further	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				downstream/cumulative effects on existing and proposed infrastructure.		investigations are undertaken to better understand the potential flooding and stormwater hazards on existing infrastructure such as associated with State Highway 57.	
FS18.034	Heritage Estates 2000 Ltd		Support in part	The submitter supports Horizon's requested relief that flood management gives effect to the One Plan Policy 9-2. However, the submitter opposes That PCG's Structure plan as notified gives effect to the One Plan Policy 9-2 based on the information available in the notified PCG technical reports. The Horizons submission disclaims any accuracy of the flood model.	Accept	That PCG enables modifications and alternatives to the Structure Plan notified for the area, through the wording of the plan where the alternatives and modifications retain integrated infrastructure for growth based on accurate flood modelling.	Accept
S60.003	Horizons Regional Council	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	<p>As noted in the section 32 report, "the topography of the plan change area exposes development to potential erosion/subsidence hazards".</p> <p>Horizons One Plan Policy 9-4 directs the way in which future development and activities in areas susceptible to natural hazard events must be managed. Horizons One Plan Policy 4-2 provides direction for small scale land disturbance, including when adjacent to some water bodies in "hill country erosion management areas" (land with a pre-existing slope of 20 degrees or more).</p> <p>Horizons One Plan Chapter 13 includes rules to manage land disturbance, including in "hill country erosion management areas". Permitted activities are subject to compliance with conditions, such as Rule 13-1 which includes conditions to ensure erosion and sediment control methods are installed prior to and maintained during the land disturbance activity and to ensure that the works do not occur on land within 5</p>	If erosion in waterways is considered a risk due to stormwater discharge, then this issue needs to be addressed prior to development. We advise you to discuss potential consenting requirements with our Consents Team. At consenting stage, Horizons River Management Group will seek information to fully understand that the downstream effects from the development site (i.e. stream stabilisation within the gullies, network configurations (including pipe sizes, discharging locations, centralised storage locations) comply with Horizons' One Plan. Since bio-retention and detention storage require maintenance works, Horizons River Management Group will also seek the creation and implementation of a maintenance strategy.	Accept	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>metres of the bed of a river that is permanently flowing, an ephemeral waterway within an active bed width greater than 1 metre, or a lake.</p> <p>We note that Appendix 11 of the section 32 report refers to possible instream stabilisation to avoid erosion risk.</p> <p>One Plan Chapter 14 Discharges to Land and Water permitted activity Rule 14-18 includes: "The activity must not cause erosion of any land or the bed of any water body beyond the point of discharge unless this is not practicably avoidable, in which case any erosion that occurs as a result of the discharge must be remedied as soon as practicable".</p>		
S60.004	Horizons Regional Council	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	<p>There are two key aspects to the management of stormwater:</p> <ol style="list-style-type: none"> 1. 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 2. inundation and the potential for stormwater to become, or exacerbate, flood hazard. <p>With regard to the first of these aspects in particular, the National Policy Statement for Freshwater Management (2020) Section 3.5(4) requires that:</p> <p>"Every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments".</p>	In relation to stormwater management, Horizons seeks provision for stormwater management to achieve an outcome that is consistent with One Plan Rule 14-18.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>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.</p> <p>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. We note that provisions have been proposed to achieve hydraulic neutrality, as is noted in the section 32 report: "Ensure stormwater management achieves hydraulic neutrality through the development and that there is no increase in stormwater effects on surrounding areas. Related to this is the establishment and management of a 5m no build setback from the gullies to provide for stormwater management for the area".</p>		
S60.005	Horizons Regional Council	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	<p>Horizons River Management Group encourage the use of on-site mitigation measures to control the rates of run-off from any development. Increased run-off from any developments has the potential to exacerbate downstream flooding issues, whether this be localised stormwater issues, or flooding from rivers, streams or other water courses. Additional stormwater generated by impermeable surfaces (e.g. new roading, concrete, buildings etc.) could exacerbate stormwater run-off and</p>	Provisions and housing/building density, should require development to provide appropriate permeable surface areas to minimise the effects of stormwater flooding. Horizons River Management Group seek that the mitigation measures are completed prior to inhabitation.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>flooding.</p> <p>Horizons River Management Group has reviewed the Stormwater Management Strategy in Appendix 11 of the section 32 Report. It proposes to attenuate the increased peak flow post development via bio-retention and flood storage.</p>		
S60.006	Horizons Regional Council	Section 32 Report - Appendix 7: Ecology Report Addendum	Support in part	<p>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.</p> <p>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 (which shows indicative extents where they may be potential biodiversity sites) has been shared with PNCC during plan preparation and pre-notification consultation.</p> <p>We are aware that an ecological assessment has been undertaken and that Schedule F habitats have been identified. 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 (NES-F) also regulates activities in and within setbacks from wetlands.</p>	<p>We raise a concern over the way the ecological assessment has grouped intermittent and ephemeral waterways together, as a fundamental step to the assessment. We identify that 'intermittently' meets the definition of a river under the RMA, and thus it should be grouped with continually flowing waterways. The report considers anything that is intermittent/ephemeral to have 'low' constraint (table 2). We do not think this is appropriate, particularly in light of Policy 7 of the NPS-FM 2020, or in terms of activities in the bed of a river in the One Plan.</p> <p>In addition, where the ecological assessment discusses water monitoring, gully 1 should not be considered appropriate for "before" monitoring in its current state. This is due to the damage from illegal activity as a result of past development.</p>	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>Depending on the context, consent may be required under the One Plan for activities in intermittent streams. We note that the constraint value identified in this report is also carried through to the Stormwater Management Strategy (in Appendix 11 of the section 32 report).</p>		
S60.007	Horizons Regional Council	General - Traffic and transport	Support in part	<p>Horizons One Plan Policy 3-7(c) provides direction to territorial authorities in regards to sustainable transport options: "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".</p> <p>Parts of One Plan Policies 3-1, 3-2, 3-4 and 3-7 are included to give effect to parts of the Regional Land Transport Strategy 2021-2031 (RLTP), which seeks to protect the strategic transport network and create opportunity for the uptake of public transport options in the future. Horizons' comments on proposed provisions relating to transport networks, modes and safety are made in the context of the RLTP. The RLTP includes five regional objectives, of which the following are most applicable here:</p> <ul style="list-style-type: none"> - Transport users in the region have access to affordable transport choices that are attractive, viable and encourage multi-modal travel; - The transport network is safe for all users; - The impact of transport on the environment, and the transport system's vulnerability to climate change, is minimised; and - Transport and land use are integrated to support well connected communities that promote a strong regional economy and liveable region. 	<p>Horizons Transport Team ask that in developing the Aokautere area, PNCC takes a greater consideration of public transport for the area. Horizons seek the inclusion of provisions that require the development layout to enable the safe movement of public transport.</p> <p>The location of infrastructure to enable public transport services should be strategically aligned with higher density areas and community facilities, including the neighbourhood centre.</p>	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>Provisions will need to align with the strategic direction of the RLTP, as well as the Regional Public Transport Plan (2022-2032). The RPTP includes six regional objectives of which the following are most applicable here:</p> <ul style="list-style-type: none"> - Provide high quality, safe and accessible public transport infrastructure and information that supports an efficient and connected transport network, and multi-modal travel; - Contribute to reductions in carbon emissions from transport and improving air quality through increased use of public transport and decarbonising the public transport fleet; and - Pursue improved, equitable access to public transport across the region. <p>As the Road Controlling Authority for Palmerston North, PNCC has an important role in supporting public transport in the city.</p>			
FS16.005	Waka Kotahi NZ Transport Agency		Support	Better integration and provision for public transport and active modes of transport prior to development, connecting the growth area with city centre, schools and nearby amenities. Involvement any proposals relating to active and public transport.	Accept	Waka Kotahi seeks this submission is allowed.	Accept
S60.008	Horizons Regional Council	General - Traffic and transport	Support in part	Horizons Transport Team would like to highlight that the recently completed review of the Palmerston North bus network includes a bus route operating down Pacific Drive, making use of the turnaround point on Atlantic Drive. During the review, it was also identified that the Aokautere Growth Area should be provided with a second bus route, to be introduced once the area is more developed. This second route would also provide improvements in coverage to residents along Ruapehu Drive and Summerhill Drive, which is not able to be properly serviced with a single bus route.	It important that all future developments consider for the provisioning of public transport, with consideration into the roading network being designed in such a way that it enables development of the public transport infrastructure. We ask that consideration is also given to supporting multi-modal connections to the public transport network, given that the 'first mile and last mile' of a passenger journey will usually require them to use another mode of travel such as walking or cycling.		Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>A second bus route in the Aokautere area is not a matter of if there will be a service but when, with consideration for a second route to be include in future mid-term service reviews.</p> <p>The Transport Team are happy to continue working alongside officers on the infrastructure needs of a public transport network.</p>		
S60.009	Horizons Regional Council	General - No specific provision referenced	Support in part	<p>Energy efficiency</p> <p>Horizons One Plan Policy 3-7(b) provides direction to territorial authorities in regards to energy efficient development.</p>	"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".	Accept
S60.010	Horizons Regional Council	General - No specific provision referenced	Support in part	Productive land - Horizons' regional scale information has classified the site as LUC Class 2, 3 and 6.	The One Plan Objective 3-4 and Policy 3-5 direct territorial authorities to consider the benefits of retaining Class 1 and 2 versatile soils for use as production land.	Accept
S60.011	Horizons Regional Council	Section 32 Report - Appendix 7: Ecology Report Addendum	Neutral	<p>We also note that:</p> <ul style="list-style-type: none"> - the discharge of stormwater to the Turitea Stream (a Schedule B SOS-A value in the One Plan) will require consent under Rule 14.25, and - Giant kōkōpu, classified as at risk, declining have been found in Moonshine Valley Creek in the past. This is not currently recognised under the One Plan, but any discretionary consent assessments may take this into consideration. 	[No specific relief sought]	Accept
S61.001	Ngawai Farms Limited	Zoning Maps	Support in part	<p>Dispersed portions of Mr Water's land would be rezoned from Rural to Conservation and Amenity Zone.</p> <p>The rezoning of land to Conservation and Amenity Zone would adversely affect Mr Waters in undertaking the current farming operation at the property. Although it is proposed that this land is vested with Council as part of the gully network, it would require the loss of land for Mr Waters</p>	<p>Retain Mr Waters' property in its original Rural Zone and Rural-Residential overlay. If Council rezoned portions of his property to Conservation and Amenity Zone, provision on the process of Council acquiring this land. The process of acquiring this land remains unclear as does how these sites would be monitored, managed, fenced off and restored. He requests that this be further discussed.</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				thereby impacting on his economic wellbeing.			
FS18.008	Heritage Estates 2000 Ltd		Support	Although the notified summary of the submission states that submission 61 supports PC-G in part, the submission speaks to opposition to the PC-G, particularly the rezoning mapping/structure plan. That the Public Works Act process for Council to acquire the land of private landowners to mitigate the effects of PC-G and repurpose the land for public use is unresolved.	Accept in part	That the submission be accepted	Accept in part
S61.002	Ngawai Farms Limited	Zoning Maps	Support in part	The Rural Residential Overlay which once covered the entirety of the property would be severely limited to the central portion of the site. The reduced Rural Residential Overlay would limit the development potential for Mr Waters. Council's requirements would be more stringent regarding subdivision potential and overall development of the property.	Retain the Rural-Residential overlay for Mr Waters land zoned Rural.		Accept in part
FS18.009	Heritage Estates 2000 Ltd		Support	Although the notified summary of the submission states that submission 61 supports PC-G in part, the submission speaks to opposition to the PC-G, particularly the rezoning mapping/structure plan. That the Public Works Act process for Council to acquire the land of private landowners to mitigate the effects of PC-G and repurpose the land for public use is unresolved.	Accept in part	The the submission be accepted	Accept in part
S61.003	Ngawai Farms Limited	Zoning Maps	Support in part	Located within Mr Water's property is a portion of land to be rezoned residential.	As this property is not fully located within the boundaries of one owner, we seek this site to be rurally zoned and retain its Rural-Residential Overlay.		Accept
FS18.0010	Heritage Estates 2000 Ltd		Support	Although the notified summary of the submission states that submission 61 supports PC-G in part, the submission speaks to opposition to the PC-G, particularly the rezoning mapping/structure plan. That the Public Works Act process for Council to acquire the land of private landowners to mitigate	Accept	That the submission be accepted.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				the effects of PC-G and repurpose the land for public use is unresolved.		
S61.004	Ngawai Farms Limited	Zoning Maps	Support in part	In accordance with Appendix 2, the western portion of the site that has road frontage to Turitea Road would contain an area that does not have a zone. It is currently zoned Rural with the Rural Residential Overlay.	Retain the rural zoning of this land and confirm the zoning of the western portion of the site that has road frontage to Turitea Road.	Accept in part
FS18.011	Heritage Estates 2000 Ltd		Support	Although the notified summary of the submission states that submission 61 supports PC-G in part, the submission speaks to opposition to the PC-G, particularly the rezoning mapping/structure plan. That the Public Works Act process for Council to acquire the land of private landowners to mitigate the effects of PC-G and repurpose the land for public use is unresolved.	Accept in part That the submission be accepted	Accept in part
S61.005	Ngawai Farms Limited	Structure Plans (General)	Support in part	<p>The proposed PCG, in accordance with Appendices 2 and 3, demonstrates a roading network to be located on Mr Water's property that provides connectivity to proposed peri-urban, local and urban connector roads and is an integral part of the proposed roading network. The acquisition of this land for roading purposes is detrimental to the current farming operation. There seems to be no provision for access to the rest of Mr Water's property, adjoining to the northeast of the proposed rezoned area. However provisions of future roading to the remainder of Mr Water's property could be provided via a revised structure plan that would include a roading extension from Council Designation No. 106 - Aokautere Water Supply leading to the east to connect to the remainder of Mr Waters property.</p> <p>A revised structure plan may need to include the provision for an alternative roading network contained outside Mr Waters property. This is on the basis that there is a limited provision on his property to be developed for residential purposes.</p>	<ol style="list-style-type: none"> 1. A revised structure plan to include provisions for providing roading access to the remaining of Mr Waters property to the north-east. Could include a roading extension from Council Designation No. 106 - Aokautere Water Supply leading to the east to connect to the remainder of Mr Waters property. 2. An alternative roading network that does not include Mr Waters property. The revised structure plan could explore the option for a direct connection to Turitea Road from Mr Green's property and an alternative route that diverts away from connecting to Designation No. 106. 3. If Council require this land to provide the roading network proposed, the process of how the Council will acquire this land. 	Accept

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S61.006	Ngawai Farms Limited	General - No specific provision referenced	Support in part	The sudden increase in rates if and when the property is to be rezoned. His concern is the sudden increase in rates at such time the Proposed PCG is to proceed.	Although not addressed in the Proposed PCG, Mr Waters would like a clear understanding of how the rezoning of his property would affect the rates.	Reject
S61.007	Ngawai Farms Limited	Section 32 Report - Appendix 8: Acoustic Assessment	Support in part	In accordance with Appendix 8, the acoustic assessment concludes the following: "The modelling demonstrates that a reasonable set back from the firing ranges is approximately 400m unless the ridgeline intercedes. It is recommended that no residential dwelling sites be located south of the ridgeline on the Waters block".	The acoustic assessment limits any future development of Mr Waters property which should be assessed at the time of subdivision. Although the imposition of a performance standard would thereby limit the residential development of Mr Water's property, the noise generated by the firing range should be dealt with at the time of future development rather than through the PCG process.	Accept in part
S62.001	Kat Lyons	Whole of Plan Change	Oppose	I am not in support of extensive greenfields development - that is, I am against us developing large tracts of land as proposed in this plan. Instead, we should develop upwards (several stories), on brownfields, especially on land closer to the city centre. This view is primarily due to the climate emergency. We need to conserve the vegetation that we already have, and we need housing to be built close to existing workplaces and infrastructure.	I seek a rejection of this proposal in its entirety.	Reject
S62.002	Kat Lyons	Whole of Plan Change	Oppose	Additionally, I am against development in Aokautere because building subdivisions far from the city centre does not encourage the residents to use active, low-emissions transport. Even with small workplaces and community hubs, Aokautere remains far from our main hospitality/entertainment, workplaces, high schools, medical services, etc. Instead, this plan encourages car-dependence. At best, the plan relies on Horizons providing excellent public transport, which it currently fails to achieve throughout the region, even within the city centre. Our existing cycling infrastructure is also abysmal	I seek a rejection of this proposal in its entirety.	Reject

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				<p>- it is not safe and does not feel safe. The council needs to get this right, throughout the city, rather than to extend itself further as proposed here.</p> <p>We need to encourage people to cycle and walk to reduce the health, wellbeing, financial, and climate issues of residents being car-dependent. The proposed subdivision does not achieve this.</p>		
S63.001	Waka Kotahi	Whole of Plan Change	Oppose	<p>Waka Kotahi opposes in part the Proposed Plan Change [because] the plan change will generate growth contrary to the Palmerston North Integrated Transport Initiative ('PNITI') business case and the Accessing Central New Zealand (ACNZ) business case.</p> <p>Proposed Plan Change G is inconsistent with the strategic direction established by Palmerston North Integrated Transport Initiative (PNITI) which has been accepted in principle by Palmerston North City Council and Waka Kotahi. PNITI identifies routes throughout Palmerston North as regionally significant transport connections. PNITI supports significant investment to the tune of \$3-4 billion over the next 10-15 years planned for the region which will further cement the region's position as a critical part of New Zealand's distribution network.</p> <p>The core inconsistencies generated by the proposed plan change is undermining the route preservation of State Highway 57. PNITI identified State Highway 56 to be detuned with the purpose of shifting heavy vehicles on to State Highway 57. Note that this is a long-term action of approximately 20 to 30 years. The preservation of this route is part of a wider interregional freight connection. This is also outlined in the ACNZ business case.</p> <p>Plan Change G would result in development to be</p>	Waka Kotahi seeks the plan change is declined in its current form, or the plan change is adapted to include clear coordination with the outcomes sought by PNITI.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				expanded along State Highway 57 ultimately requiring the speed limit to reduce from the current 70km/h to 50km/h from Albany Drive to Aokautere School with a 30km/h from Summerhill to Pacific Drive due to the pedestrian risk. PNITI identifies this section of SH 57 as reducing to 80km/h, only as part of the longer term actions in the 30-year programme. This increase travel time will likely decrease the desirability of this route for interregional travel. Waka Kotahi aims to minimise the segment of SH 57 impacted by reduced speeds in order to reduce severance, conflict with inter-regional freight, and increase freight efficiency.			
FS18.012	Heritage Estates 2000 Ltd		Neutral	<p>Submitter notes that Waka Kotahi advises through its submission that PC-G that they oppose the plan change because it is inconsistent with the strategic direction established by Palmerston North Integrated Transport Initiative ('PNITI') which has been accepted in principle by PNCC.</p> <p>The submitter seeks a decision on PC-G consistent with the integrated growth initiatives for Palmerston North that have statutory weight in decision-making.</p>	Reject	That the statutory weight of PNITI is confirmed prior to the call for evidence.	Reject
S63.003	Waka Kotahi	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	<p>Safety: Waka Kotahi generally accepts the findings of Appendix 5: Transportation Assessment prepare by Harriet Fraser Traffic Engineering & Transportation Planning. However, Waka Kotahi wishes to highlight that the Transportation Assessment does not identify an existing LOS deficit along the core state highway intersections. Specifically:</p> <ul style="list-style-type: none"> • State Highway 57/Summerhill Drive has an existing LOS A (Table 3), • State Highway 57/Pacific Heights Drive has an existing LOS A (Table 4), • State Highway 57/Johnsonville Drive has an existing LOS A (Table 5). 	<p>Waka Kotahi seeks further clarity on how the proposed plan change will manage and fund any upgrades that are required to the road network as a result of the development. Waka Kotahi seeks that the plan change does not proceed unless the consequential infrastructure upgrades can be adequately funded. It is noted that the NLTF is unlikely to be sufficient.</p> <p>Waka Kotahi seeks the plan change is declined in its current form, or the plan change is adapted to include identification of how future development is to fund any</p>		Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>Note that LOS A is the highest identification.</p> <p>The safety issues identified in Section 3.6 are found to be minor and non-injury crashes which do not indicate a current priority for safety treatments in the area.</p> <p>The plan change may generate a Level of Service ('LOS') deficiency without appropriate mitigation or funding identified: The Transportation Assessment identifies a drop in the safety of the abovementioned state highway intersections as a result from the proposed development. Accordingly, any safety improvements required as a result of the development facilitated by the plan change could result in more than minor safety effects. At present, there is no clear understanding on how these upgrades are proposed to be funded.</p>	<p>upgrades to the state highway network required as a result of the development facilitated.</p>	
S63.004	Waka Kotahi	Whole of Plan Change	Neutral	<p>Waka Kotahi acknowledge that there may be an existing pedestrian safety deficiency across State Highway 57 from IPU Tertiary Institute [to] the residential areas on Pacific Drive. To improve the safety deficiency works are being considered under the walking and cycling program. Waka Kotahi is not in a position to confirm a solution to this deficiency at this time, however, will share the details with Palmerston North City Council once available. It is noted that these improvements were not identified through PNITI.</p> <p>The plan change is likely to increase the worsening of pedestrian safety by way of increasing residents.</p>	<p>Waka Kotahi seeks further information on how pedestrian safety across the state highway will be managed via the plan change.</p> <p>Waka Kotahi seeks the plan change is declined in its current form, or the plan change is adapted to include:</p> <ol style="list-style-type: none"> 1. Identification of how future development is to fund any upgrades to the state highway network required as a result of the development facilitated. 2. Mitigation of worsening the active mode severance between SH57 and the plan change area. 	Accept in part

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S63.005	Waka Kotahi	Whole of Plan Change	Neutral	<p>Waka Kotahi supports the provision for a neighbourhood centre as part of Proposed Plan Change G. However, we acknowledge that the bulk of employment opportunities for future residents will generally be located beyond the Aokautere growth area. As such, signalling an underlying assumption that people will drive in and out of the city daily contributing to an increase in private vehicle movements.</p> <p>The NPS-UD provides a policy direction for well-functioning urban environments which have good accessibility, including by way of public or active transport and support reductions of greenhouse emissions. This is strong guidance on the type of outcome which plans should be progressed; my interpretation is that new, state highway projects to service growth would not be well-aligned to this in most situations.</p> <p>To achieve the outcomes sought by the GPS on Land Transport, behaviour change for mode shift must be given effect to. Waka Kotahi supports well-functioning urban environments which facilitate a reduction in emissions and supports shift mode. This will have an impact on our future investments, particularly those driven by growth when we are needing a reduction in vehicle kilometres travelled ('VKT').</p> <p>Waka Kotahi is not in a position to endorse urban expansion of Aokautere on the basis presented in the proposed plan change that it's located adjacent to an existing urban environment. Waka Kotahi has a strong preference to delivering additional housing within existing urban environments.</p>	<p>Waka Kotahi seeks to encourage an increase in brownfield and urban areas prior to expanding into areas that are in conflict with strategic documents and those that will increase VKT. [See full submission for details on Waka Kotahi's functions, powers and responsibilities, and the relevant strategic transport policy framework].</p> <p>Waka Kotahi seeks: The plan change is declined in its current form, or the plan change is adapted to include: Better integration of how active modes of transport will be provided for connecting the growth area with the city centre, schools and nearby amenities. A more detailed analysis on how VKT and transport emissions reductions will be achieved.</p>	Accept in part
S63.006	Waka Kotahi	Whole of Plan Change	Neutral	[See full submission for details on Waka Kotahi's functions, powers and responsibilities, and the relevant strategic transport policy framework].	Waka Kotahi seeks the establishment of the Palmerston North Future Development Strategy (FDS) prior to accepting greenfield expansion.	Reject

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				<p>Greenfield urban expansion is better supported by identification within the Future Development Strategies.</p> <p>The FDS and associated implementation plan (clause 3.18) are the key tools identified in the NPS-UD to achieve alignment between infrastructure investment and future land use outcomes.</p>	The implementation plan would be the most useful place to identify when/where/what infrastructure improvements are needed, including SH57.	
S64.001	Scott Knowles	General - No specific provision referenced	Support	<p>I'm voicing my enthusiastic support for the vision, courage and effort that has gone into the Aokautere Plan. I was impressed with its first iteration as presented at an IPC/IPU event in 2019, and I'm pleased to see that many features remain intact.</p> <p>As a long time resident of Pacific Drive, I would be directly impacted by this plan, but more importantly, by the consequences of a lack of such plan. I have watched the ad hoc growth of this area for two decades. It has produced a tangle of uncoordinated, opportunistic, unsympathetic developments that isolate people more than engage them. Every indication is that this will continue until the major landowners run out of green fields.</p> <p>This Aokautere plan is a comprehensive re-think of local development. Although not so novel in other parts of the world, it shows real stretch of New Zealand norms. I'm impressed that Palmy could become an example and national leader in residence planning! Truly, the good and thoughtful aspects of this plan are too numerous to list here.</p>	Go for it!	Accept
S64.002	Scott Knowles	General - Open space and recreation	Support		What happened to the original full length 'Wetland Park' idea, whereby it had a long winding stream/reserve leading away from Royal Crescent (heading southeast)?	Reject

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S64.003	Scott Knowles	General - Aokautere Neighbourhood Centre	Support	Comparison could be made to Summerset at Summerhill or Speldhurst at Kimberley near Levin.	A retirement village and population is welcome. However there is a risk that it could be an uninspiring focus of the central area, with repetitive design elements and homogenous construction. Comparison could be made to Summerset at Summerhill or Speldhurst at Kimberley near Levin. Worse, it might be gated and off limits to neighbours, giving the unwelcoming feel of a privileged enclave or a prison, depending on your perspective.	Accept in part
S64.004	Scott Knowles	General - No specific provision referenced	Support		I hope that the original design of 'Gully Edge Streets' is retained. The natural areas of gullies, slopes and streams should be enjoyed by everyone, not just homeowners with fortunate backyard views.	Accept
S64.005	Scott Knowles	General - No specific provision referenced	Support	The elegance of the plan and the beauty of neighbourhoods could be lost over time as a succession of homeowners implement short-sighted self-serving modifications to home and grounds.	Has much consideration been given to enduring covenants over the sections? The appeal of an Aokautere address should include confidence that housing won't be a free-for-all.	Reject
S64.006	Scott Knowles	General - No specific provision referenced	Support		I support including well-planned rental accommodation. Aokautere living should be available even without a home loan. The examples of Simplicity Living build-to-rent might be studied.	Accept in part
S64.007	Scott Knowles	General - Traffic and transport	Support	I see from PNCC materials that traffic movement through the Summerhill / Aokautere / Fitzherbert areas has had much research and deliberation. I hope it works.	Roading in and out of the suburb will be an issue for the 900+ new sections. I see from PNCC materials that traffic movement through the Summerhill / Aokautere / Fitzherbert areas has had much research and deliberation. I hope it works. Please keep your sights on a future where accommodating private cars isn't the first aim.	Accept
S64.008	Scott Knowles	Whole of Plan change -	Support		Regarding repurposing Adderstone Reserve (a separated notification), I support this as it	Reject

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		Adderstone Reserve option			seems a necessary cost to realise the larger, greater vision of the PC G Aokautere Plan.	
S65.001	Steve Welch	General - Multi-unit residential development	Oppose	I find it hard to understand why the PNCC will allow building to be planned within a 5m setback of the 30 Moonshine Valley gully edge that represents the highest boundaries of 11 lifestyle properties. Turitea developments have been restricted to 15m and regarding gully/valley edges that are not, in my opinion, as at risk in terms of drainage that will affect existing natural water flow through and across the land...	I oppose proposing housing proximity to the "gully" edge of Moonshine Valley property boundaries. Consult more personally and proactively with affected property owners and redesign plans along the Moonshine Valley boundary.	Accept
S65.002	Steve Welch	General - Multi-unit residential development	Oppose	It seems bizarre to all the 30 Moonshine Valley residents with whom I have spoken that the proposal places multi-unit dwellings, apparently of at least 3 stories and 11m height (basically small blocks of flats), closely up against the highest boundaries of various Moonshine Valley lifestyle properties. The fact also that these flats will be segregated on spurs away from the predominant single dwellings means that a "ghetto" effect will be likely. The flats will undoubtedly be more affordable and it seems obvious that this design is intended to keep up the selling value of land for single dwelling sites thus making property more unaffordable and making more profit for the developer. Surely the PNCC should be promoting more affordable housing not allowing strategies such as this that will help boost prices.	I oppose multi-unit housing positioning in "ghettos" along spurs closest to Moonshine Valley 'gully' edges. I would have though flats would be better being more central to the development and scattered around so that prejudices cannot build.	Accept in part
S65.003	Steve Welch	General - Stormwater, erosion and flooding	Oppose	Adoption of storm water storage tanks/ponds as a strategy to minimise changes to existing natural water flow through and across the land is of great concern. There is not enough information provided on the actual size or design of these for me to be able to fully understand the strategy. What is obvious though is that the building work and the ponds will change the water table and the	Oppose: 1. Adoption of storm water storage tanks as a strategy to minimise changes to existing natural water flow through and across the land. 2. Storm water storage tank positioning.	Accept in part

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				flow at the gull edges and any well thought out plan is reliant upon strict adherence by the developer, something that has not happened in the nearby developments so far. It is fact that the development so far has adversely affected Moonshine Valley streams and flora. It is obvious too that the ponds will present a risk of busting/leaking and they are being positioned so that any such unexpected flow will be down the gully sides of Moonshine Valley Road properties. This just seems stupid.		
FS18.026	Heritage Estates 2000 Ltd		Support	This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents. The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.	Accept in part That the submission is accepted	Accept in part
S65.004	Steve Welch	General - Rural-residential development	Oppose	I have been told that it is incumbent upon PNCC to ensure that any new subdivision does not have an adverse affects upon subdivisions, this would be especially so for the unique and specially zoned rural-residential Moonshine Valley that the PNCC has taken pains to nurture over the years. The plans in the PCG are contrary to this policy.	Oppose: The impact from this new residential subdivision upon the existing specially zoned rural-residential Moonshine Valley subdivision. Consult more personally and proactively with affected property owners and redesign plans along the Moonshine Valley boundary.	Accept in part
S65.005	Steve Welch	General - Stormwater, erosion and flooding	Oppose	My own property will be deeply affected by the current PCG. There will be a pond on the corner of our property immediately uphill from our stand of 40yr old pines, gums, redwood, and cherry trees. This ground here is very dry and the trees provide excellent shelter from southerlies. The root masses of these trees will be affected by change in	Oppose - the impact upon my own property. Consult more personally and proactively with affected property owners and redesign plans along the Moonshine Valley boundary.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				either wetter or dryer condition caused by the pond and building drainage.			
FS18.027	Heritage Estates 2000 Ltd		Support	This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents. The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.	Accept	That the submission is accepted	Accept
S65.006	Steve Welch	General - Multi-unit residential development	Oppose	Additionally these trees effectively provide a line of sight barrier (if incomplete) between the rear of our house, that includes bedrooms, and the 11m blocks of flats that are planned to look down at our windows. The trees will absolutely dominate the near view of the flats to the extent of blocking winter sun and most of the views that are described in the PCG as a reason for their positioning. Conversely if the trees die or fall due to the water changes then our previously idyllic lifestyle block will be overlooked by a multitude of dwellings. How can this be right?	Consult more personally and proactively with affected property owners and redesign plans along the Moonshine Valley boundary.		Accept
S65.007	Steve Welch	General - Multi-unit residential development	Oppose	The impact of noise, pollution, litter, reduced privacy, crime etc from the planned building near our boundary will destroy the appeal/attractiveness of our home of approx 20 years. I believe that in obvious cases such as the Southerly positioned Moonshine Valley residents, that a more personal approach should be taken by the PNCC to better work in with existing lifestyles and to understand the impact of their plans	Consult more personally and proactively with affected property owners and redesign plans along the Moonshine Valley boundary.		Accept in part
S65.008	Steve Welch	General - Multi-unit residential development	Oppose	I find it hard to understand why the PNCC will allow building to be planned within a 5m setback of the 30 Moonshine Valley gully edge that	Oppose: Proposed housing proximity to the "gully" edge of Moonshine Valley property boundaries.		Accept in part

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				represents the highest boundaries of 11 lifestyle properties. Turitea developments have been restricted to 15m and regarding gully/valley edges that are not, in my opinion, as at risk in terms of the adverse affect of noise and other urban characteristics such as increases in pollution, litter, and crime that may impact existing lifestyle property owners.	Consult more personally and proactively with affected property owners and redesign plans along the Moonshine Valley boundary.	
S66.001	Jessica Costall	General - No specific provision referenced	Support in part	While I recognise that Palmerston North has a growing population and needs more housing in the future, and in fact have submitted in favour of rezoning part of Adderstone Reserve for this purpose, I do not believe rezoning of such a large parcel of agricultural land in Aokautere is feasible or environmentally-responsible at this time. The scale of this proposed development is considerable and it will increase the reliance on cars, increasing air pollution and creating a less safe environment, particularly for pedestrians and cyclists.	Do not rezone such a large area for residential housing, unless the Council is also willing to: Investigate whether housing needs could be met within the inner city - there are lots of vacant commercial buildings not being used and falling into disrepair, for example. 1.	Accept in part
S66.002	Jessica Costall	General - Traffic and transport	Oppose	There is only one vehicle bridge crossing the Manawatu River within the current city limits and therefore there is only one key road leading between the CBD and Summerhill/Aokautere. Other river cities, notably Whanganui and Hamilton, have more bridges, and therefore have transportation networks that can cope better with new housing developments on either side of their rivers. Any increase in population on this side of the river will put a lot of extra traffic onto Summerhill Drive, the bridge and Fitzherbert Avenue. We have already seen a considerable increase in traffic along Summerhill Drive as a result of the new subdivisions around Johnstone Drive. People struggle to turn from side streets such as Ruapehu Drive, onto Summerhill Drive, especially if they need to make a right-hand turn. The Council needs to seriously consider installing traffic lights at these intersections.	Do not rezone such a large area for residential housing, unless the Council is also willing to: 1. Create frequent express bus services between Aokautere and the CBD, and heavily subsidise their fares. 2. Alter Summerhill Drive and other roads to improve pedestrian, cyclist and vehicle safety - by installing traffic lights at intersections such as where Ruapehu Drive joins Summerhill Drive, reducing speed limit to 50km/hr, improving pedestrian crossings, establishing a median strip for vehicles turning right off Summerhill Drive (this is not in place for residents of	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<p>Springdale Grove/Heathcote Place, for example), and creating a physically separated cycle lane.</p> <ol style="list-style-type: none"> 3. Other roads will also need to be improved to accommodate higher traffic flow, for example, where traffic from Summerhill merges from the overpass onto Tennent Drive just before the bridge, and the short road linking downhill Summerhill traffic to Atawhai and Massey. 4. Commit to establishing a second vehicle and pedestrian bridge across the Manawatu River in the vicinity of Aokautere. 5. Investigate whether housing needs could be met within the inner city - there are lots of vacant commercial buildings not being used and falling into disrepair, for example. 	
S66.003	Jessica Costall	General - Traffic and transport	Oppose	<p>There are insufficient schools on this side of the river. While the Ministry of Education may build a new school in Summerhill in the future, this is unlikely to provide unmet needs for all levels of schooling - i.e., a new primary school may be built but it is unlikely an additional secondary school would be established. This will again, lead to traffic congestion along Summerhill Drive, particularly at peak times.</p>	<p>Do not rezone such a large area for residential housing, unless the Council is also willing to:</p> <ol style="list-style-type: none"> 1. Alter Summerhill Drive and other roads to improve pedestrian, cyclist and vehicle safety - by installing traffic lights at intersections such as where Ruapehu Drive joins Summerhill Drive, reducing speed limit to 50km/hr, improving pedestrian crossings, establishing a median strip for vehicles turning right off Summerhill Drive (this is not in place for residents of Springdale Grove/Heathcote Place, for example), and creating a physically separated cycle lane. 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<ol style="list-style-type: none"> 2. Other roads will also need to be improved to accommodate higher traffic flow, for example, where traffic from Summerhill merges from the overpass onto Tennent Drive just before the bridge, and the short road linking downhill Summerhill traffic to Atawhai and Massey. 3. Commit to establishing a second vehicle and pedestrian bridge across the Manawatu River in the vicinity of Aokautere. 	
S66.004	Jessica Costall	General - Traffic and transport	Oppose	The existing public transport options are not frequent or fast enough to entice users. Express bus shuttles that go between the CBD and Aokautere may go some way to alleviating traffic, but only if services are frequent, reliable, and cheap - otherwise commuters will stick with the convenience of their own private vehicles.	Do not rezone such a large area for residential housing, unless the Council is also willing to create frequent express bus services between Aokautere and the CBD, and heavily subsidise their fares.	Accept in part
S66.005	Jessica Costall	General - Traffic and transport	Oppose	One of the major attractions of the Summerhill suburb is the rich network of walking paths and the planted gully network. But pedestrian safety will be compromised by an increase in traffic along Summerhill Drive. Pedestrian crossings need to be made safer, perhaps with traffic lights or even walkways that go above the road. I am in favour of extending a footpath on the Adderstone Reserve side of Summerhill Drive, connecting residents of the new subdivisions with the shopping centre.	Do not rezone such a large area for residential housing, unless the Council is also willing to: <ol style="list-style-type: none"> 1. Alter Summerhill Drive and other roads to improve pedestrian, cyclist and vehicle safety - by installing traffic lights at intersections such as where Ruapehu Drive joins Summerhill Drive, reducing speed limit to 50km/hr, improving pedestrian crossings, ...and creating a physically separated cycle lane. 2. Commit to establishing a second vehicle and pedestrian bridge across the Manawatu River in the vicinity of Aokautere. 	Accept in part

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S66.006	Jessica Costall	General - Open space and recreation	Oppose	The existing gully network is not being adequately maintained. For example, newly established native plantings in Springdale Reserve are being rapidly overtaken by banana passionfruit and other noxious weeds, despite residents like myself attempting to carry out weed control themselves. It is all very well for the Council to say they will establish further walkways and plantings as part of this proposed redevelopment, but if they are not looking after the recreational areas that currently exist I am pessimistic about what will happen to any future plantings.	[No specific relief sought]	Reject
S67.001	Jill White	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	I am supportive of the general proposals in this section of the proposed plan change. However, given the potential climate change situation faced in this country as elsewhere, it is critical that measurement and consideration of this aspect of future wellbeing is to the fore in deciding appropriate land use and its future protection.	That climate change considerations be to the fore when making stormwater management and other relevant decisions.	Accept
S68.001	Russell Poole	Whole of Plan Change	Support in part	<p>Council's initiative towards generating a more orderly and functional development off the Pacific Drive area is to be welcomed. Essentially, however, the plan looks like a game of catch-up, because so much is already locked in by the existing development, as the draft plan acknowledges.</p> <p>Problematic features (where I think the catch-up is unlikely to redress matters, at least not fully) include:</p> <ul style="list-style-type: none"> - remoteness from facilities and amenities, forcing most residents to make their journeys by car; - a series of bottlenecks from the side streets on to Pacific Drive and then from Pacific Drive itself on to Aokautere Drive (the new access to Aokautere Drive from Johnstone Drive does not significantly improve this situation); - narrow sinuous streets that militate against public transport; 	[No specific relief sought]	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>- housing built close to the lip of the gullies with little or no provision for soakage in an area where localised slips and slumping are clearly evident and potential exists for future subsidence;</p> <p>- a dearth of suitable locations on which to build multi-unit housing.</p> <p>Despite the above reservations, most of which Council can do nothing about, the draft plan contains some good ideas to consider.</p>		
S68.002	Russell Poole	General - Traffic and transport	Support in part	<p>The proposal to create access into the suburb from Turitea Road:</p> <p>Resilience, particularly in an emergency, will be gained by the provision of this alternative route, which does not rely on Pacific Drive. At the same time, the proposed connections to the suburb from Turitea Road appear somewhat tortuous, to judge from the map. There will also be a bottleneck where traffic has to exit on to Old West Road (westwards) or Turitea Road (eastwards), the latter followed by a second bottleneck into Summerhill Drive. These factors mean that predictably in practice most drivers will prefer Pacific Drive, as a wide relatively straight route. As a result, traffic volumes on that route will not be materially reduced. Traffic volumes are not high at present but we can expect them to increase markedly as the area becomes more built up. The same may apply to Turitea Road in due course.</p>	[No specific relief sought]	Accept in part
S68.003	Russell Poole	General - Multi-unit residential development	Support in part	<p>The proposed provision for multi-unit housing.</p> <p>This seems to me, in and of itself, a necessary and progressive step. At the same time, it will be difficult to implement effectively, as currently formulated. The draft plan envisages the construction of multi-unit housing at the very furthest reaches of the suburb, located at the far end of "necks" of land. I see two main problems</p>	With these points in mind, a better location for high-density housing would seem to be beside the main artery, Pacific Drive. Most of the sections along this road have long since been coopted for less intensive occupation but one exception is the Pacific Drive portion of Adderstone Reserve, whose future use is up for discussion as part of the current consultation. I suggest that here is a logical	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>with that:</p> <p>These proposed locations place the multi-unit housing at maximum distance from Pacific Drive, which is, as noted above, the sole artery for the suburb. There seems to be no scope whatever, given the terrain and the existing street lay-out, for alternative arterial routes giving more immediate access to the proposed multi-unit housing.</p> <p>It is precisely the residents of the multi-unit housing who might be most receptive to using public transport, were it to be made available. But, given the existing street lay-out (which really would be more appropriate in a gated community), buses will have to thread their way along narrow side-streets to reach the multi-unit housing. There is no apparent provision for turning circles or bus stops.</p> <p>Residents of multi-unit housing might also be more inclined than other residents to use local shops but they could scarcely be more remotely situated from the existing shopping. Even the proposed small neighbourhood shopping centre by Pacific Drive south of Johnstone Drive will scarcely be handy, even supposing it is commercially viable.</p>	<p>place to place multi-unit housing. If subsequently the IPU were to release some of its vacant land on the east side of Pacific Drive, the multi-unit housing could be extended northwards on to the IPU land. Residents in this location would have the advantage of easy access to existing public transport. They would also be within walking distance of existing local shopping (in the Summerhill Shopping Centre), which in turn would broaden the economic base for retailers and hospitality businesses.</p>	
S68.004	Russell Poole	General - Multi-unit residential development	Support in part	<p>The draft plan envisages the construction of multi-unit housing at the very furthest reaches of the suburb, located at the far end of "necks" of land. A concentration of multi-unit housing on these narrow necks of land will drastically reduce their soakage capacity, with the attendant risk that stormwater and silt will spill over into the gullies below. This is already occurring, as is evident to anyone who monitors the state of the streams and ephemeral creeks that flow into the Manawatū River from the Aokautere side. Further</p>	<p>With these points in mind, a better location for high-density housing would seem to be beside the main artery, Pacific Drive. The Pacific Drive portion of Adderstone Reserve... is a logical place to place multi-unit housing.</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>destabilisation of this already unstable land is a likely outcome of the plan as conceived.</p> <p>Recent housing damage in Nelson, Wellington and Tauranga should teach us that what might at a stretch be viable today (or yesterday) will not be so in the fairly near future.</p>		
S68.005	Russell Poole	General - Open space and recreation	Support in part	<p>The proposed creation of additional reserves in the gullies. I see this as, in principle, another commendable idea in the draft plan. A concern, however, is how far this component is compatible with the remainder of the plan. In the existing development, housing presses up close to the lip of the gullies and in some cases property boundaries even extend down into the gullies from the flat land above. It seems extraordinarily shortsighted that that has been allowed to happen; the lack of a uniform clear demarcation between private property and reserve land will militate against systematic revegetation.</p> <p>Another problem, as I have already noted, is stormwater drainage, which has the potential to scour out the slopes below the proposed housing and carry silt into the streams, creating hostile conditions for aquatic life.</p>	For the gullies to become sustainable reserves they will need better protection than they appear to have at present or is envisaged in the plan.	Accept in part
S68.006	Russell Poole	Whole of Plan change - Adderstone Reserve option	Support in part	<p>Stormwater drainage, has the potential to scour out the slopes below the proposed housing and carry silt into the streams, creating hostile conditions for aquatic life. For the gullies to become sustainable reserves they will need better protection than they appear to have at present or is envisaged in the plan.</p>	As regards the other portion of Adderstone Reserve under discussion being repurposed for housing, I think this would be a good use of the land so long as adequate offsets can be allowed at either side, i.e. before the Adderstone and Mangaōtāne (Abby Road) gullies. That would help to reduce the stormwater problems referred to in my previous paragraph.	Accept in part
S69.001	Karen Lyons	General - Traffic and transport	Oppose	<p>I do not support the plan as it stands. Yes, we do need more houses as the population grows, but there needs to be more thought put into the plan. There is no or very little public transport, so</p>	That the plan to build in Aokautere is delayed until Palmerston North has a more cohesive plan to reduce emissions and take	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				emissions from cars will increase. Even with more amenities in the area children will still need to get to school/sport/after school activities. People will have to commute into town. One estimate has an extra 8000 car trips per day to Aokaurere Drive.	the climate crisis into account when looking at how the city could grow.	
S69.002	Karen Lyons	General - No specific provision referenced	Oppose		Any planned houses ought to cover a range of economic brackets - not just upper end houses.	Accept
S69.003	Karen Lyons	General - Open space and recreation	Oppose		Generally in Palmerston North there needs to be more attention paid to going up rather than spreading out, not simply to have a denser housing area, but to allow for green spaces, not the ubiquitous concrete, around dwellings. This is even more important in greenfield developments such as the Aokautere one.	Accept
S69.004	Karen Lyons	General - No specific provision referenced	Oppose		Developments should avoid the "gated community" look such as there is now along Aokautere Drive. Much better to encourage tree planting to screen traffic and its attendant noise.	Accept
S70.001	Epenesa Faaiuso	General - No specific provision referenced	Support in part	<p>As the strategic plan indicates that there will be a shortage of housing (which is an issue we face now) in the next 10 to 30 years. The new zone will help alleviate some of the housing issues.</p> <p>My concern is that the land will be developed with only financially profit in mind (short term) and not much of community aspirations (long-term) as well. An aspiration for many families, including our Pacific peoples, is to have home ownership which benefits their family and community but also future generations. These families are usually in lower social economic backgrounds and are from minority communities. The affordability and understanding of the process of owning your own home are very important to help those vulnerable in our community. I used the word 'home' not</p>	<p>PNCC recognise the difficulty Pacific people experience in finding options for housing within the Palmerston North area. Also, to have a system that creates equitable opportunities for Pacific People through:</p> <ol style="list-style-type: none"> 1. Council-owned properties in the new areas that meet the needs of our Pacific families. 2. Assisting Pacific families (equitable resources) to access home ownership, for example, interpreters, and legal or financial support. 3. Identifying an area in which Pacific providers can develop housing 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				'properties' (plural) as the gap between the wealthy (landlords/developers) and poor (renters) widens. If PNCC could provide help to reduce barriers to home ownership and enable equitable access for Pacific families. It is about allowing our Pacific families to have choices but this is difficult if they have not been included / afterthought in the process.	which meets the needs of our Pacific community.	
S71.001	Susan and Yann Le Moigne	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	<p>This road is currently serving well the existing residents of Abby Road and Woodgate Road. However, it is a narrow road and not suitable to become a connecting road to the proposed subdivision as the volume of traffic will be too great. The onstreet parking during the day and particularly in the evenings and weekends causes the road to become single lane and any further volume of traffic on Abby Road from the proposed subdivision will render it dangerous for drivers and for active transport users that use the road to connect to homes and Adderstone Reserve. Drivers will be dodging around parked vehicles and speeding to reach Pacific Drive. There is the high likelihood that with the proposed connection linking Abby Rd to Johnstone Drive, the existing Abby Road portion will become a rat race as drivers try to beat the traffic between Johnstone Road and Pacific Drive. This kind of driving behaviour is prevalent across all New Zealand cities and there is nothing to suggest it will not happen here as the traffic volumes and travel times increase due to the developments.</p> <p>By allowing Abby Road to be opened up to the proposed subdivision it then becomes an enabler to encourage people to use their cars rather than consider other transport options. By blocking the Abby Road access to cars from the new subdivision but keeping open an off-road shared path, new residents may consider using active transport modes or walking to the public</p>	<p>We oppose connecting the existing Abby Road (Point E on the Aokautere Structure Plan Map 7A.3E) to the proposed subdivision on Adderstone Reserve and the adjoining land. We propose that the existing Abby Road should become a cul-de-sac and all the traffic from the new subdivision is directed over the proposed connection to Johnstone Drive, where there is the choice to go left or right to leave the suburb.</p> <p>A shared off-road pathway for active transport users could then be created from Adderstone Reserve and the new development to the existing Abby Road, and this will provide a safe route for these users, along a much quieter road than is currently being planned. This would be in line with the PNCC's 2021-31 strategies of promoting safer active transport.</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>transport system on Pacific Drive which is an efficient means of reaching the city centre, or to the supermarket on SH57.</p> <p>This thinking would be in line with the PNCC's 2021-31 active transport strategies where the measures of success are increasing walking and cycling, increasing bus passenger numbers, decreasing carbon emissions and decreasing reliance on private motor vehicles.</p>		
S71.002	Susan and Yann Le Moigne	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	<p>This shared path should be moved to the northern side (City side) between the Ruapehu Dr, it is wider and has a better view of the traffic coming from the east. The south side is narrow (especially at the Pacific Dr. point) and cyclists, walkers and other active transport users will be too close to the heavy traffic and high volume of vehicles that use SH57, particularly the large trucks coming from Hawkes Bay and that are traveling south (as well as the quarry trucks).</p>	<p>We oppose No.3 on Aokautere Structure Plan Map 7A.3E; Proposed Shared path on South side of Aokautere Drive between Johnstone Drive and Pacific Drive. We propose that it should be moved to the northern side of SH57 from Ruapehu Dr. to the Adderstone Reserve entrance.</p> <p>It should be separate from the road, a white line and green paint will not protect users. Safe pedestrian/cycle crossings need to be installed across SH57 to help these active transport users safely navigate across this extremely busy road (only one (P) seems to have been proposed).</p>	Accept in part
S71.003	Susan and Yann Le Moigne	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	<p>Reasons for this are:</p> <p>Water run-off: The hard surfaces of roads and houses will increase water run-off into the gullies which will cause sedimentation build up in the waterways, and increase the occurrence of slips which the land is prone to. Many small and medium sized slips can be seen happening in the gullies every wet season. A buffer zone will help absorb some of the water before it flows down some of the steep sided gullies, especially those which do not currently have any significant vegetation on them. All the gullies' waters flow eventually to the Manawatu.</p>	<p>We propose that better protection for the gullies G1-G18 in the proposed plan is required.</p> <p>Buffer zones of land approximately 30 metres wide between housing and roads and the gullies' edges should be created to help protect the gullies. Whilst not all the gullies have yet been planted out steps should be put in place to protect them before development takes place.</p>	Accept in part

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				The PNCC's Palmy 2021-31 Eco city goal priority number 1 (pg 4) is to respect and enhance the mauri of the Manawatu, so protecting the gullies' margins with a buffer zone will help meet this goal by reducing sedimentation and slips.		
S71.004	Susan and Yann Le Moigne	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	Emerging canopy trees: such as totara, kahikatea, matai, rewarewa, tawa and hinau and other trees will be at risk from pruning, poisoning or removal if housing is too close to the gullies, as they will potentially cause shade and block views, this is already an issue at the Pacific Drive end of Adderstone Reserve, with six twenty year old trees being felled by a neighbour.	We propose that better protection for the gullies G1-G18 in the proposed plan is required. Buffer zones of land approximately 30 metres wide between housing and roads and the gullies' edges should be created to help protect the gullies. Whilst not all the gullies have yet been planted out steps should be put in place to protect them before development takes place.	Accept in part
S71.005	Susan and Yann Le Moigne	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	Fly tipping by close-by residents: By having a buffer zone between the housing and the gullies, flytipping and green waste tipping into the gullies would be minimised. It will also reduce the temptation by the developers and builders to tip their waste into the gully as can be seen in Upper Pari, Manga-O-Tane gullies and elsewhere. Green waste flytipping will introduce noxious and invasive weeds in the gully as has happened in the past. Encroachment by future property owners to use the common land for their own purposes as can be seen around many regenerating gullies where exotic and invasive weedy plants are planted amongst indigenous plants.	We propose that better protection for the gullies G1-G18 in the proposed plan is required. Buffer zones of land approximately 30 metres wide between housing and roads and the gullies' edges should be created to help protect the gullies. Whilst not all the gullies have yet been planted out steps should be put in place to protect them before development takes place. A buffer zone would also allow for walking paths to be created around the gullies and provide access into the gullies for revegetation, pest control and weed maintenance projects.	Reject
S71.006	Susan and Yann Le Moigne	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	There does not appear to be any safe off-road shared pathways allowed for through the proposed development. Off-road shared pathways allow for a wide variety of users from school children, elderly people, people with mobility issues, commuters, micro transport users as well	We propose that a safe off-road shared pathway for active transport users through the proposed Aokautere development is provided for. Whilst there is a shared pathway at point Q in the Aokautere Structure Plan Map 7A.3E	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>recreational users to move safely around the neighbourhood.</p> <p>A planned off-road shared pathway through the development connecting all the various parts of the suburb would facilitate active transport use and reduce dependence on motor vehicle use. The Railway Reserve pathway in Nelson is an excellent example of such an off-road shared path, it links the city centre with Richmond. It has many access/exit routes along the way to different parts of the neighbourhood, a wide range of people use it for many purposes such as commuting, getting to school, shopping as well as for recreation. The high volume of people using this path is due to the fact that it safe and away from traffic and connects people to where they want to go, it is also planted out and doubles as precious green space for people to enjoy.</p>	<p>and useful for Valley Views it does not aid in helping active transport in the upper levels of the subdivision.</p> <p>With current government policies advocating for reductions in gas emissions from transport and PNCC's own 2021-31 strategic goals for a sustainable, eco-city that encourages active transport then planning for a shared off-road pathway in the Aokautere Structure Plan as an alternative means for people of all ages and abilities to move about (not on the road) should be considered.</p>	
S72.001	Kerry Park	Structure Plan: Map 7A.4E Adderstone Reserve Option	Oppose	<p>My submission opposes the proposed plan change G to provide for additional housing because of the increased demands the proposed storm water management system will have on Moonshine Valley and the adverse effects created by erosion, due to storm water being directed to the Moonshine Valley water catchment area.</p> <p>The Tutukiwi Reserve stream runs adjacent to my property border and in periods of moderate to heavy rainfalls, the water has increased from a 3-metre stream into a 20-metre torrent and has at times, submerged the whole corner of the Tutukiwi Reserve bordering my fence line. In these instances, the 3-metre stream becomes a 50-meter flood plain.</p> <p>On 23rd August 2022, the Tutukiwi Reserve car park was fully underwater after one night of heavy rain and the Tutukiwi Reserve stream does flood</p>	<p>I wish to have amended the D1-D5 multi-unit housing proposal. I would like to see any multi unit housing taken well away from the gully's that the current proposal has them adjacent to. This is to reduce the negative impact of stormwater on the surrounding gullies and streams.</p> <p>I suggest moving the D1-D5 Multi Unit Housing sites further away from the gullies that feed the Tutukiwi Reserve stream, Aokautere Church stream and the Moonshine Valley Reserve stream.</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>regularly after only moderate rainfall.</p> <p>The proposed D1-D5 Multi unit dwellings are positioned on the borders of gullies that flow water into the Aokautere Church stream, the Moonshine Valley Reserve stream and the Tutukiwi Reserve stream.</p> <p>The Adderstone Reserve public walkway is already showing signs of erosion, making it dangerous for the public to enjoy this communal area.</p> <p>The walking planks over the stream in Hokonui Heights have been washed away in the recent rain events due to the increasing rainfalls we are experiencing.</p> <p>Before any proposed development has begun, the gully's surrounding Moonshine Valley and the streams within the valley are having to cope with naturally increasing rainfalls.</p> <p>Stormwater runoff after the proposed development will exacerbate the erosion and the demands of the streams and gullies will worsen due to this proposal diverting storm water into the Moonshine Valley catchment area.</p> <p>[Photos provided]</p>		
S73.001	Kevin Low	Whole of Plan Change	Not Stated	<p>I am delighted that Council has decided to take a lead on shaping one of the more important growth locations in the city. I have observed the neighbourhood grow over the last two decades without any overarching strategy and at the whims of developers.</p> <p>Since that time, most cities have migrated away from bland, cookie-cutter style and vehicle-centric plans for building new communities and, in</p>	<p>That the plan change process and housing consents be stopped until such time that the following issues are addressed:</p> <ol style="list-style-type: none"> 1. That a plan can be demonstrated to comply with the council-adopted statutory requirements that council has with regard to reducing net emission by 30% by 2031. 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>recognition of the current climate change emergency, are embracing new concepts such as co- housing, shared services, and and 15 minute neighbourhoods (where basic services are no more than a 15 minute bike ride or walk away).</p> <p>Regrettably, I see little evidence of Council or their experts addressing transport (1), Landscape (6) or retail (8) have considered the mandated need to halve net emissions by 2035, and no attempt to comply with the Government target to reduce vehicle kilometres travelled by 20% by the end of this decade.</p>	<p>2. That housing developers be required to demonstrate compliance of their plans to meet a reduction of vehicle kilometres travelled by 20% by the end of this decade.</p>	
S73.002	Kevin Low	Whole of Plan Change	Not Stated		<p>I would like to see the plan expanded to incorporate elements of the following:</p> <ol style="list-style-type: none"> 1. A primary school 2. A day-care centre 	Reject
S73.003	Kevin Low	Whole of Plan Change	Not Stated		<p>I would like to see the plan expanded to incorporate a sports field.</p>	Reject
S73.004	Kevin Low	Whole of Plan Change	Oppose	<p>Most cities have migrated away from bland, cookie-cutter style and vehicle-centric plans for building new communities and, in recognition of the current climate change emergency, are embracing new concepts such as co-housing, shared services, and and 15 minute neighbourhoods (where basic services are no more than a 15 minute bike ride or walk away).</p>	<p>I would like to see the plan expanded to incorporate elements of the following:</p> <ol style="list-style-type: none"> 1. Two village centres with facilities such as a convenience store (not supermarkets), cafe, variety takeaway food, and chemist or medical centre. 2. Remove zoning limitations to allow for light commercial activity such as shared office communities to be within walking distance. 	Reject
S73.005	Kevin Low	Whole of Plan Change	Not Stated	<p>Most cities have migrated away from bland, cookie-cutter style and vehicle-centric plans for building new communities and, in recognition of the current climate change emergency, are</p>	<p>I would like to see the plan expanded to incorporate elements of the following:</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				embracing new concepts such as co- housing, shared services, and and 15 minute neighbourhoods (where basic services are no more than a 15 minute bike ride or walk away).	<ol style="list-style-type: none"> 1. Consideration to shared household amenities along the principles of co-housing. 2. Provision for storage in each street or group of dwellings for shared amenities such as shared vehicle, cycles, lawnmowers, gardening implements and storage. 	
S74.001	Elizabeth Endres	Structure Plans (General)	Oppose	<p>I absolutely oppose multi unit housing in this area of Aokautere.</p> <p>This type of housing belongs in the inner city not in a semi rural area.</p> <p>This high density housing on land prone to slips is a recipe for disaster. You only need to look at the number of subsidence events in the area. Extreme weather events are now occurring regularly and are no longer 1 in 50 and 100 year events as has been experienced this year alone. We should be learning from these events and not trying to mitigate disaster as this plan appears to try to do. High density housing is going to create considerable more run off and compound already problematic stability of the extensive gully network.</p>	To abolish all multi unit and high density housing in this area of Aokautere.	Reject
S74.002	Elizabeth Endres	Whole of Plan change - Adderstone Reserve option	Oppose	<p>I also absolutely oppose any housing within the Adderstone Reserve.</p> <p>We should be preserving our reserve areas and commending the green corridors folk that have done an amazing job of planting the area. These gully areas are delicate ecosystems and should be left well alone.</p>	To leave Adderstone Reserve as a green space with no housing.	Accept
S75.001	Gareth Orme	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	My input is around the integration of this expanded area in relation to its periphery. This extends to the safety and hauora of not only those who will populate this extension of Palmerston North but also the current residents.	Adequate drainage to allow the land to be usable. The recent impact on Nelson, Marlborough and its capacity to handle extreme water run-off exposed the flow on effect of developing areas above populated	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				It also extends to infrastructure management with a focus on storm and wastewater management. The recent impact on Nelson, Marlborough and its capacity to handle extreme water run-off exposed the flow on effect of developing areas above populated valleys and sloping land; we need to be cognisant of the 'whole of system'.	valleys and sloping land; we need to be cognisant of the 'whole of system'.	
S75.002	Gareth Orme	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	<p>My input is around the integration of this expanded area in relation to its periphery. This extends to the safety and hauora of not only those who will populate this extension of Palmerston North but also the current residents.</p> <p>This largely arises from the capacity increase to vehicle traffic, pedestrians, personal electric commuters, cyclists and services. The impact: Assuming 1000 new houses, with an average of 2 vehicles per household (2018 census) then there is inevitably an increase to traffic of (conservatively) 1000 cars commuting to work, school, errands at each end of the day, the bus services, contractors, maintenance, visitors.</p> <p>Access: There is a growing risk with the notable increase in population on the eastern side of the Manawatu River and that is concentrating all of the traffic and access through the Fitzherbert route. Over and above the inherent risk created with the sheer volumes of 1000 new households and the ancillary activity it creates, there will be a time when the entire "Massey side" will have limited or no access to the city over the Manawatu river and this clearly will have a financial and safety impact.</p>	Since the residential area is growing on the eastern arm of Summerhill and north-east of Pacific Drives it would be logical to create a secondary access route into the city across the Manawatu River east of the current route. This would further diminish the necessity to cross dangerous intersections for current residents.	Reject
S75.003	Gareth Orme	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	There is currently notable risk for residents exiting the Johnstone Drive, Pacific, Ruapehu, Silkwood and Cashmere intersections in vehicles and far greater risk for cyclists and pedestrians.	In the immediate term there needs to be specific consideration of Intersections of:	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<ol style="list-style-type: none"> 1. Cashmere Drive and Aokautere Drive/SH57 - A good candidate for a roundabout. 2. Ruapehu Drive and Aokautere Drive/SH57 - Inclusion in the signalled Pacific Drive intersection design; or Hard median protected merging bay (right turn from Ruapehu to SH57). 3. Ruapehu Drive and Summerhill Drive - Potential for a signalled intersection (concern around hidden queues over crest of Summerhill during peak flow). 4. (P) Map 7A4E - New pedestrian crossing: less than ideal place for a crossing as it is just around a bend when heading east then ensuring the first few cars that stop are at risk of being rear-ended by traffic flowing from the city. Alternative might be between Cashmere Drive and Silkwood Place where there is notably better visibility. 	
S75.004	Gareth Orme	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	I certainly support the stated principle: 'Building a connected community'. My input is around the integration of this expanded area in relation to its periphery. This extends to the safety and hauora of not only those who will populate this extension of Palmerston North but also the current residents.	<ol style="list-style-type: none"> 1. Provision for properly constructed leisure parks - not just green area - create a community atmosphere. 2. Adequate drainage to allow the land to be usable. 3. Seating, trees, paths, children's areas. 4. Flat turf for neighborhood games (e.g. Football, cricket pitch/nets, touch, petanque, tennis ...). 	Accept
S76.001	Rifle Rod and Gun Club Manawatu Inc Martin Hunt	Zoning Maps	Oppose	Rifle Rod and Gun Club Manawatu Inc oppose changing the land zoning from rural to residential. This would mean we would share our boundary with residential zoned properties, or be in close proximity to residential properties, with the increased potential for noise complaints.	Rifle Rod and Gun Club Manawatu Inc. oppose the re-zoning of the neighbouring land. If the land was to be re-zoned then the Club would require any homes and businesses built with one kilometre of our property be	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>By opposing the re-zoning of this land, we are flagging our concerns about the Club being subject to noise complaints. The discharge of firearms always has the potential for noise complaints. Being close to residential properties means the Club would almost certainly face opposition from new neighbours.</p> <p>With re-zoning we would have an increased number of neighbours. All these neighbours would be zoned residential.</p> <ol style="list-style-type: none"> 1. This higher density of neighbours increases the probability of noise complaints. 2. District plan noise limits of residential properties are significantly lower than rural zoned properties. Again, this increases the probability of noise complaints. 3. Amenity noise expectations of owners and occupiers of residential properties are much lower than those living in the rural zone, and this will result in increased complaints being received by the Club and by Council. 4. The Club is concerned about reverse sensitivity issues that will arise from the plan change. <p>The Club has been existence since 1946. Rifle Rod and Gun Club Manawatu Inc. has been in operation at our current address of 333 Turitea Road, Palmerston North since the early 1960's. The Club has maintained a good relationship with its neighbours for all this time.</p> <p>The Club already manages the noise coming from our property by: Managing the hours of operation - 9am to 5pm in winter months, 9am to 6pm in summer months No shooting on Christmas Day No shooting until 12 noon on ANZAC Day Suspending shooting when requested by neighbours for local weddings and other special occasions.</p>	<p>built with professionally designed and approved insulation, in conjunction with no complaints consent notices on properties. If the land was to be re-zoned any PNCC consent should include that the land owners are aware that a Gun Club is within close proximity .</p> <p>As a further mitigation measure, we request there is a clear demarcation point at the top of the ridgeline of the Waters property which provides significant noise buffering to any residential development further to the north. Any land or any dwellings constructed on the ridgeline or south of it will experience RRG activity noise in an unimpeded way with only distance providing any respite. Potential dwelling sites to the west of the Waters farm access road will also be directly exposed to RRG noise except they will be further away.</p>	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				The club contributes to the public good by allowing the NZ Police to train their staff in firearms proficiency at the Club, and by providing a safe and professional teaching environment where young people can gain sporting skills for hunting and international competition.		
S77.001	Rangitāne O Manawatū	General - No specific provision referenced	Support	<p>Protection and enhancement of values within the Aokautere gully system.</p> <p>Previous developments have infilled and/or encroached into the Aokautere gully systems. For example, extensive areas of gully system have been lost to the Pacific and Atlantic Drive developments. We think extensive gully edge encroachment is likely across the entire Aokautere area. This practice has had a high effect on Rangitāne values, especially our relationship with our traditional sites and travel routes into the Tararua Range, the mauri and natural flow of wai, and probable loss of taonga species and their habitats.</p> <p>These values are protected as a matter of national importance under section 6(e) of the Resource Management Act, where the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga shall be recognised and provided for.</p> <p>The Aokautere Structure Plan and Plan Change G recognise and provide for the cultural landscape. The landscape-led development approach restricts development in the gullies, restores gully vegetation and green corridors, and enables access to the gully systems for recreation so that our community can value these spaces as we do.</p>	<ol style="list-style-type: none"> 1. Development in gully systems is avoided in all cases, except where critical infrastructure, such as road connections and the recreation network, is installed. 2. Existing indigenous vegetation ecosystems in gully systems are protected. 3. Gully systems will be ecologically and culturally restored. 4. Future development responds to the escarpment-gully edge landforms, avoiding encroachment into the gully systems using a 5-m buffer strip. This minimises earthworks requirements and maintains public view shafts. 5. Roads that follow gully edges are retained and housing that backs onto gully edges is minimised so that the gullies are maintained as public assets. 6. The gullies are zoned conservation and amenity areas, as proposed. 	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S77.002	Rangitāne O Manawatū	General - No specific provision referenced	Support	<p>Te Mana o te Wai: The gully systems within Aokautere have a range of ecosystem types, including intermittent, ephemeral and permanent waterways, wetlands and ponds, and terrestrial vegetation. The mauri from the whenua (lands) of Aokautere is collected in these gully ecosystems and feeds the Manawatū Awa and Turitea Stream. We have a statutory acknowledgement over these waterways within the Rangitāne o Manawatū Claims Settlement Act (2016). As part of the implementation for the National Policy Statement for Freshwater Management 2020, we have developed a statement to describe what Te Mana o te Wai means to us in our local context. Our statement applies to the Manawatū Catchment Freshwater Management Unit, which includes:</p> <ul style="list-style-type: none"> - the Manawatū Awa - coastal lakes - their catchment, tributaries and connections, including groundwater, wetlands and lagoons. <p>Our statement is as follows: "The most significant quality that flows through wai is mauri. The mauri is generated throughout the catchment and is carried through the connected tributaries, groundwater, wetlands and lagoons. It is the most crucial element that binds the physical, traditional and spiritual elements of all things together, generating, nurturing and upholding all life, including that of Rangitāne o Manawatū. The health and well-being of Rangitāne is inseparable from the health and well-being of wai. The Manawatū Awa, its catchment, tributaries and connections, wetlands and lagoons are taonga and valued for the traditional abundance of mahinga kai and natural resources."</p> <p>Previous development has increased sedimentation rates, which has had a negative</p>	<ol style="list-style-type: none"> 1. Bioretention devices (rain gardens or wetlands) are incorporated into the road layout and all discharge from impervious surfaces is directed to these devices for filtration and cleansing, as proposed. 2. Flooding is mitigated through use of green infrastructure, such as detention ponds. 3. The flood mitigation detention ponds or other flood control methods should not be considered as water quality treatment devices, as proposed. 4. The streetscape is designed to link stormwater treatment and planting with the retired gully systems. This should be retained as proposed. 5. Amenity street planting, wetlands and/or rain gardens use locally sourced native trees that connect the street network with the gully systems. 6. Gullies are stabilised with native plantings to minimise in-stream/habitat erosion risks and stormwater is discharged at the bottom of gullies rather than overland flow. This should be retained. 	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				effect on water quality and aquatic ecosystem health. Sedimentation of waterways is a common result of construction but can be avoided if carefully managed. Aokautere has had extensive earthworks and gully infilling. Many of the aquatic ecosystems have been affected by sedimentation because of poor environmental management practices. Stormwater is discharged directly to the environment and can be quite cloudy, indicating significant contamination levels.		
S77.003	Rangitāne O Manawatū	General - No specific provision referenced	Support	<p>Connected communities, housing choice and mixed density:</p> <p>Parts of Aokautere have been developed over the past few decades. Typically, developers have provided larger sections and houses to the market at premium prices. This has resulted in parts of the community, in particular our Māori community, being excluded from Aokautere due to affordability. Developers have not provided smaller homes, in particular one- or two-bedroom houses, suitable for young or small families, singles and the elderly. Parts of Aokautere are disconnected from the village and amenity areas, which discourages active transport modes. For example, Pacific Drive is long and filled with cul-de-sacs.</p>	<ol style="list-style-type: none"> 1. Plan Change G provides a range of housing choices and densities, and requires developers to provide a range of development outcomes that meet a broad range of community needs. This should be retained. 2. Higher density around the village and recreational areas should be retained. 3. Plan Change G knits together areas of existing and new developments in a more cohesive spatial plan. Street connectivity, open space connectivity and the recreation network is important and should be retained. 	Accept
S77.004	Rangitāne O Manawatū	General - No specific provision referenced	Support	<p>Accidental discoveries and archaeology:</p> <p>Previous developments have gone ahead without our participation. Being able to implement our tikanga prior to ground-breaking and throughout construction is critical as our role as kaitiaki.</p> <p>As described by the Rangitāne o Manawatū CIA, the plan change area was not occupied by any other iwi and other iwi having an interest from a cultural perspective is inappropriate. We accept that there are possible downstream effects, but</p>	<p>Plan Change G specifically introduces accidental discovery protocols, which require developers to engage with us to manage our cultural expectations as part of the subdivision. This provision should be retained.</p> <p>Rangitāne o Manawatū is identified as the iwi to work with regarding accidental discoveries. This should be retained.</p>	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision	
				because we intend to improve water quality outcomes, these effects would be beneficial.			
FS18.015	Heritage Estates 2000 Ltd		Oppose	<p>PC-G introduces accidental discovery protocols to manage Rangitāne o Manawatū cultural expectations as part of a subdivision into the district plan.</p> <p>Rangitāne o Manawatū has established rights under section 6(e) of the RMA 1991, statutory acknowledgment within the Rangitāne o Manawatū Claims Settlement Act (2016) and under the New Heritage New Zealand Pouhere Taonga Act 2014, accidental discoveries and archaeology through these provisions are currently inherent to the ODP. The proposed duplication through new protocols in the plan is considered unnecessary and should not be included in the plan.</p>	Reject	That the submission is not accepted	Reject
S77.005	Rangitāne O Manawatū	7: Objective 3	Support	Existing indigenous vegetation and ecosystems in gully systems should be ecologically and culturally protected, restored and enhanced.	Retain as notified.	Accept	
S77.006	Rangitāne O Manawatū	7: Policy 3.7	Support	This policy is supported, particularly subclauses (g) (i) and (j).	Retain as notified	Accept in part	
S77.007	Rangitāne O Manawatū	R7.15.2.1	Support	<p>The additional matters of discretion ensure adequate consideration of stormwater runoff, effects on the gully network and cultural values.</p> <p>Addressing archaeological discoveries in performance standards is supported - see (f).</p>	Retain as notified.	Accept in part	
S77.008	Rangitāne O Manawatū	7A: Objective 4	Support	Support ensuring stormwater management does not result in adverse effects on the environment.	Retain as notified.	Accept in part	
S77.009	Rangitāne O Manawatū	7A: Policy 4.6	Support	Flooding mitigation through green infrastructure, including accommodation of detention ponds and infrastructure is supported.	Retain as notified.	Accept in part	
S77.010	Rangitāne O Manawatū	7A: Policy 4.9	Support in part	Measures to integrate water sensitive design for management of water quality and quantity are	Clarify to ensure it is clear that flood mitigation detention ponds or other flood	Accept	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				supported, however, the flood mitigation detention ponds or other flood control methods should not be considered as water quality treatment devices, as proposed.	control methods are not water quality treatment devices.	
S77.011	Rangitāne O Manawatū	7A: Policy 5.1	Support	Plan Change G provides a range of housing choices and densities, and requires developers to provide a range of development outcomes that meet a broad range of community needs. This should be retained.	Retain as notified.	Accept in part
S77.012	Rangitāne O Manawatū	7A: Policy 5.2	Support	Plan Change G provides a range of housing choices and densities, and requires developers to provide a range of development outcomes that meet a broad range of community needs. This should be retained.	Retain as notified.	Accept
S77.013	Rangitāne O Manawatū	7A: Policy 5.3	Support	Plan Change G provides a range of housing choices and densities, and requires developers to provide a range of development outcomes that meet a broad range of community needs. This should be retained.	Retain as notified.	Accept
S77.014	Rangitāne O Manawatū	7A: Policy 5.4	Support	Plan Change G knits together areas of existing and new developments in a more cohesive spatial plan. Street connectivity, open space connectivity and the recreation network is important and should be retained. Higher density around the village and recreational areas should also be retained.	Retain as notified.	Accept in part
S77.015	Rangitāne O Manawatū	7A: Objective 6	Support	Existing indigenous vegetation and ecosystems in gully systems should be ecologically and culturally protected from inappropriate use and development.	Retain as notified.	Accept
S77.016	Rangitāne O Manawatū	7A: Policy 4.6	Support	Support ensuring stormwater management does not result in adverse effects on the environment.	Retain as notified.	Accept in part
S77.017	Rangitāne O Manawatū	7A: Policy 4.7	Support	Support ensuring stormwater management does not result in adverse effects on the environment.	Retain as notified.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S77.018	Rangitāne O Manawatū	7A: Policy 4.8	Support	Support ensuring stormwater management does not result in adverse effects on the environment.	Retain as notified.	Accept in part
S77.019	Rangitāne O Manawatū	7A: Policy 4.9	Support	Support ensuring stormwater management does not result in adverse effects on the environment.	Retain as notified.	Accept in part
S77.020	Rangitāne O Manawatū	7A: Policy 6.1	Support	<p>Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.</p> <p>Future development responds to the escarpment-gully edge landforms, avoiding encroachment into the gully systems using a 5-m buffer strip. This minimises earthworks requirements and maintains public view shafts.</p> <p>Roads that follow gully edges are retained and housing that backs onto gully edges is minimised so that the gullies are maintained as public assets.</p>	Retain as notified.	Accept in part
S77.021	Rangitāne O Manawatū	7A: Policy 6.2	Support	<p>Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.</p> <p>Future development responds to the escarpment-gully edge landforms, avoiding encroachment into the gully systems using a 5-m buffer strip. This minimises earthworks requirements and maintains public view shafts.</p> <p>Roads that follow gully edges are retained and housing that backs onto gully edges is minimised so that the gullies are maintained as public assets.</p>	Retain as notified.	Accept in part
S77.022	Rangitāne O Manawatū	7A: Policy 6.3	Support	<p>Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.</p> <p>Existing indigenous vegetation and ecosystems in</p>	Retain as notified.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				gully systems should be ecologically and culturally protected from inappropriate use and development.		
S77.023	Rangitāne O Manawatū	7A: Policy 6.4	Support	Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.	Retain as notified.	Accept in part
S77.024	Rangitāne O Manawatū	7A: Policy 6.5	Support	Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.	Retain as notified.	Accept in part
S77.025	Rangitāne O Manawatū	7A: Policy 6.6	Support	Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features. Support vesting of the gully network in council for conservation and amenity.	Retain as notified.	Accept in part
S77.026	Rangitāne O Manawatū	7A: Policy 6.7	Support	Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.	Retain as notified.	Accept
S77.027	Rangitāne O Manawatū	7A: Policy 6.8	Support	Generally supportive of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.	Retain as notified.	Accept
S77.028	Rangitāne O Manawatū	R7A.5.2.2	Support	The use and incorporation of water sensitive design, including bioretention devices (rain gardens or wetlands) into the road layout and measures to ensure all discharge from impervious surfaces is directed to these devices for filtration and cleansing is supported.	Retain as notified.	Accept
S77.029	Rangitāne O Manawatū	R7A.5.2.1	Support	Support the additional matters of discretion to ensure adequate consideration of effects on the gully network and cultural values.	Retain as notified.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S77.030	Rangitāne O Manawatū	R7A.5.2.2	Support in part	<p>The mauri from the whenua (lands) of Aokautere is collected in gully ecosystems and feeds the Manawatū Awa and Turitea Stream. Locally sourced species are necessary to ensure Mauri is not diminished through new use and development.</p> <p>An additional performance standard required under a comprehensive development plan would ensure that locally sourced species are considered during consenting processes.</p>	<p>Include an additional performance standard to ensure native planting is locally sourced. And Any alternative or consequential amendments that may be necessary or appropriate.</p>	Accept
S78.001	Wayne Phillips	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	<p>Stormwater Management is the most critical area of this development which has my support with the following caveat. That the GHD Conclusions and Recommendations, pg37, are followed stringently with particular emphasis on the north eastern boundary adjoining the Moonshine Valley properties below the F1 to F5 plateau multi-unit developments.</p> <p>The suggested detention ponds will only retain a finite quantity and not handle the increasing weather events climate experts are predicting. These ponds will also provide a breeding ground for mosquito colonies and create a major hazard to the safety of young children living in the adjacent developments.</p>	<ol style="list-style-type: none"> 1. That the GHD Conclusions and Recommendations, pg37, are followed stringently with particular emphasis on the north eastern boundary adjoining the Moonshine Valley properties below the F1 to F5 plateau multi-unit developments. 2. The proposed 5m setback should be revisited and further detail provided to mitigate peak flow control of stormwater runoff from development of the F1 to F5 plateau's runoff spilling over into the Moonshine Valley properties, which are already suffering runoff erosion and stream scouring throughout the valley. <p>Confirmation of the following additions to the Plan:</p> <ol style="list-style-type: none"> 1. That a 10m buffer zone at the rear of the F1 to F5 clusters be created and fully planted with native species to absorb any runoff into Moonshine Valley and a further 5m setback to the building line at the rear of those properties. 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<p>2. That the detention ponds be replaced with a fully piped underground drainage system across the rear of the properties at the boundary feeding directly into the closest of the four Major Discharge locations on the plan.</p> <p>3. That the multi-unit proposal be changed to a single unit status to reduce the hard ground cover (and therefor runoff), on the respective plateau's. This will also reduce people movements, vehicle numbers, parking provision, traffic movement and resident safety on these no exit streets.</p>	
S79.001	Rob Campbell	General - Traffic and transport	Support in part	<p>I am not in favour of extending Abby Road through to Johnstone drive. This link will affect the natural aspect of the existing gully over/through which this road will pass.</p> <p>As a general rule I would prefer that we work with the natural features in this area rather than amend them. The potential for damage to the gully environment from motorised traffic at any level is something that I believe we should avoid.</p> <p>The road will potentially benefit a limited number of households, by allowing them to exit onto SH57 via either Pacific Drive or Johnstone Drive. I accept that the proposed changes to the Adderstone Reserve (which as an aside I support) will increase this number to an extent but regardless the maximum number of residents likely to benefit will be fixed and not particularly significant.</p>	<p>Amend the proposal by removing the proposed extension of Abby Road to Johnstone Drive. I would prefer that Abby Road be marginally widened (which I believe is possible) and that the connection with Pacific Drive be amended to include a roundabout, to ensure reasonable traffic flow.</p> <p>I support the proposal to put traffic signals at the Pacific Drive/SH 57 intersection.</p> <p>I would however like to see a roundabout considered at the intersection of Johnstone Drive and SH 57, to assist traffic flow from this major artery.</p>	Accept in part
S80.001	Elizabeth Fisher	General - Stormwater, erosion and flooding	Oppose	<p>Excessive Subdivision on the 'farmland' presents significant increase in the amount of stormwater and runoff onto my land. The impermeable footprint from dwellings, roading, individual residents concreting their sections causing more</p>	<p>My recommendations are:</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>runoff to gather in large amounts, as it cannot be absorbed naturally into the already saturated and greatly reduced natural land footprint, thus causing flooding, erosion, slips and comprising hillsides and gullies on my land.</p> <p>I have three major gullies on my land which carry large amounts of runoff which is manageable at present. The extra volumes of water from the Multi Unit Residential Housing footprint will naturally run down gullies and hillsides into my ponds and Tutukiwi ponds quickly filling them flooding onto my road as well as undermining the Tutukiwi stream banks of which part my road sits above.</p> <p>Historically, slopes are prone to slip on this side of the valley. Instability of the hillsides along with the vibrations from traffic and earthquakes through the earth substructure are concerning regarding the Retention Ponds. These can easily rupture releasing tons and tons of water down the gullies onto the land, ponds and stream below. Endangering the aquatic life the valley residents have nurtured for many years.</p>	<ol style="list-style-type: none"> Not to build multi unit residential housing along Moonshine Valleys boundary. The subdivision of this farmland be restricted to a minimum of 1 ha. to act as a transition area from the small sections of Woodgate to the Special Character designated area of Moonshine Valley. That the dwellings be setback at least 15 meters from the boundary as has been the rule in Turitea Valley which we don't have in this proposal and they (Turitea) don't have the Special Character Designation. Yet we are both part of the 'Green Belt'. <p>These recommendations would help protect our land, the indigenous vegetation, robust aquatic habitat, bird and animal populations from light/noise pollution, especially our abundant nocturnal wildlife.</p>		
FS18.028	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	Accept in part	That the submissions be accepted	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S80.002	Elizabeth Fisher	General - Multi-unit residential development	Oppose	These recommendations would help protect our land, the indigenous vegetation, robust aquatic habitat, bird and animal populations from light/noise pollution, especially our abundant nocturnal wildlife.	My recommendations are: <ol style="list-style-type: none"> 1. Not to build multi unit residential housing along Moonshine Valleys boundary. 2. The subdivision of this farmland be restricted to a minimum of 1 ha. to act as a transition area from the small sections of Woodgate to the Special Character designated area of Moonshine Valley. 3. That the dwellings be setback at least 15 meters from the boundary as has been the rule in Turitea Valley which we don't have in this proposal and they (Turitea) don't have the Special Character Designation. Yet we are both part of the 'Green Belt'. 	Accept in part
S81.001	Steve Rowe	General - Traffic and transport	Oppose	<p>The elephant in the room is that there is only one bridge over the Manawatu river.</p> <p>I have lived on the Aokautere side of the river and everything you need to do, you have to come over the Fitzherbert bridge into town. This bridge is already too congested with existing traffic, it will not handle cars from another 1000 sections. If this proposal is allowed to go ahead, residents on the Aokautere side will soon be demanding a second bridge as it will be needed to handle the increase traffic.</p> <p>Who will pay for this bridge? The PNCC can not afford to pay for another bridge at a cost of \$100 million plus. I believe the council has hundreds of millions of dollars to find in the next 10 - 15 years for other infrastructure up grades that it does not know where it is coming from apart from huge rate increases. PNCC rate payers have no money for a second bridge.</p>	Only allow this proposal to go ahead if a substantial dedicated bridge levy of \$50,000 per section is applied to any new section on the Aokautere side. This not only includes this proposed rezoning, but any other subdivision on the eastern side of the Manawatu river.	Reject

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				<p>I will only support this development if the property owner/developer is levied on each section for a bridge contribution. The starting rate should be \$50,000 per section for a bridge levy. 1000 sections would produce \$50,000,000 bridge fund to the future. If this makes this development uneconomic, so be it.</p> <p>I don't believe it good enough for somebody to land bank farm land, convince council to change the zoning, and walk away with \$50 million tax free, and then leave the mess behind for the rate payers to fund.</p>		
S82.001	Craig Hindle	General - No specific provision referenced	Oppose	The proposed development area from what we can work out is going to increase noise levels both short and long term.	Withdrawal of the proposed plans and continued protection of the areas within the proposals.	Reject
S82.002	Craig Hindle	General - Traffic and transport	Oppose	There will be an increase in vehicles and congestion as an infrastructure plan is not supplied.	Withdrawal of the proposed plans and continued protection of the areas within the proposals.	Reject
S82.003	Craig Hindle	Whole of Plan change - Adderstone Reserve option	Oppose	We moved into the area because of the reserve and the knowledge that because it is a reserve it would not be developed. The development of this area will have a detrimental affect on the nature of the reserve and surrounding areas. The definition of a reserve is a tract of land managed so as to preserve its flora, fauna, and physical features. This is Palmerston Norths City Council custodial responsibility which it will fail to carry out if it was to follow both of the proposals put forward. This means in truth that Palmerston North City Council would therefore fail all of the residents within Palmerston North.	Withdrawal of the proposed plans and continued protection of the areas within the proposals.	Accept in part
S83.001	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support		Support A, B, C, D, E, F, G, H, I, J, K, M, O, P and Q. It would be more efficient to have the added connectivity throughout the neighbourhood, and to have a neighbourhood centre at B.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S83.002	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support	Multi-unit housing will be important for Palmerston North into the future to more efficiently use land space, and as a cheaper more easily maintained option for small families or singles/couples.	Support A, B, C, D, E, F, G, H, I, J, K, M, O, P and Q. I support proposed changes to Adderstone Reserve to make space for more residential houses.	Accept in part
S83.003	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support		Support A, B, C, D, E, F, G, H, I, J, K, M, O, P and Q. The junction upgrades are needed at M, N, O for safety and efficiency, and a junction upgrade is also needed at the intersection between Old West Road and Summerhill Drive, and the intersection between SH57 and Johnstone Drive. It is great to see the proposed Pedestrian Crossing at P, and the new shared pathway at 3, as currently it is very dangerous crossing the road by pedestrians and young cyclists, as there is a high speed limit and blind S bends in the road. I propose the pedestrian crossing at P be an underpass or over pass for increased safety, or the underpass/overpass could be done closer to the summerhill shopping centre.	Accept in part
S83.004	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support	It is great to see the proposed Pedestrian Crossing at P, and the new shared pathway at 3, as currently it is very dangerous crossing the road by pedestrians and young cyclists, as there is a high speed limit and blind S bends in the road.	Support A, B, C, D, E, F, G, H, I, J, K, M, O, P and Q and 3. I propose the pedestrian crossing at P be an underpass or over pass for increased safety, or the underpass/overpass could be done closer to the summerhill shopping centre.	Accept in part
S83.005	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support	I support better management of stormwater in the Aokautere Growth Area, as to date developers have provided substandard stormwater systems. I support better management of earthwork effects, as given the nature of steep terrain in the reserves there is a risk of erosion.	Support A, B, C, D, E, F, G, H, I, J, K, M, O, P and Q. The drainpipe that has been laid under the proposed road at the cross gully link appears to be too narrow, as during high rain fall it appears water over flows the road, so it is proposed a larger diameter drain pipe is laid.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S83.006	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support in part	We have a spectacular Eastward view from our property at 88 Johnstone Drive, thus have chosen not to fence along that boundary or plant high plants, and it would be disappointing and a bit of an invasion of privacy for a walkway to be placed along the boundary of our section.	G1: I support the inclusion of walkways in the reserves in the community, however ask that a walkway is not placed in G1 that is too close (i.e. within 5 metres of the boundary) to properties along Johnstone Drive. As an alternative, people could walk along Johnstone Drive footpaths, and the footpath that will go along the road down the cross gully link.	Accept in part
S83.007	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support		It would be great to have a two way cycle path that goes to Cliff Road from either Edenmore Terrace, Vaocluse Heights, Cashmere Drive or Ruapehu Drive, to provide a safer and more pleasant access to Fitzherbert Bridge by bike. Support public bus connections from Aokutere to town, so our son can catch the bus to get to PNINS.	Accept in part
S83.008	Ben Somerton	Structure Plan: Map 7A.4E Adderstone Reserve Option	Support		I support proposed changes to Adderstone Reserve to make space for more residential houses.	Reject
S84.001	Tabitha Prisk	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	I do not support the proposed provisions unless more consideration is given to the effects on Turitea Road. Turitea Road is already in disrepair. Creating this new growth area with roads which feature footpaths and cycle lanes which will then connect to Turitea Road is a recipe for disaster. Turitea Road is in poor condition; it is narrow at best and has no cycle lanes or footpaths. It is short- sighted and naive to think that the residents in the Aokautere Growth area will not utilise the foot paths and cycle lanes on their road which will connect to Turitea Road and thus they will continue along Turitea Road on the non- existent foot paths and cycle lanes there. This will cause far too much congestion on Turitea Road. The Transport Assessment stated only that	I seek the Palmerston North City Council to put this plan on hold until Turitea Road is upgraded so that the enormous amount of traffic that will be utilising the road can do so safely. Turitea Road needs to be upgraded and widened. Additionally the two one lane bridges along Turitea Road would also need to be upgraded and widened to accommodate the additional traffic--vehicle, bicycle and pedestrian.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				"further review of the safety of the intersections to accommodate additional traffic on the Valley Views and Turitea Road approaches is recommended." This comment does not come close to addressing the demands that will be placed on Turitea Road with the increased traffic and congestion.			
FS16.007	Waka Kotahi NZ Transport Agency		Support in part	Agree further consideration to the effects and required mitigation measures required on Turitea Road. Waka Kotahi supports further investigation into transport infrastructure upgrades required from Plan Change G including understanding the effects and required mitigation measures and/or infrastructure upgrades required in adjoining corridors such as Turitea Road.	Accept in part	Waka Kotahi seeks this submission is allowed.	Accept in part
S85.001	Gaylene Tiffin	Section 32 Report - Appendix 11: Stormwater Management Strategy	Oppose	Stormwater going into our gully at Moonshine Valley A01 and the multi-unit development. I strongly oppose this subdivision. The technical report from GHD has not included any of the work they did on our property showing the destruction that has happened. This is continually getting worse. [Photos included]	STOP the subdivision now, and fix the damage that has occurred already. I invite the council and any other interested parties to 14 Moonshine Valley to see the damage that has occurred, divets that are now metres deep and wide, fences buried, trees falling, slips, pasture land that is now full of rubbish weed and general rubbish.		Accept in part
FS18.033	Heritage Estates 2000 Ltd		Support	Fundamental errors in some of the supporting technical reports that underpin the plan change. The effects of PCG cannot be quantified in the notified documents. The reports do not contain sufficient base information to enable the submitter to brief and engage a stormwater expert to peer review, the effects of stormwater are interrelated with erosion, Geotech and ecology/planting	Accept in part	That the submission is accepted	Accept in part
S86.001	Jayne Hewson	Structure Plans (General)	Oppose	I do not want Valley Views to join up with the subdivision that householders will use to exit the subdivision, boy racers will turn into a racetrack and will provide criminals with multiple getaway options. It is a small country road that under this	Do not join Valley Views to the subdivision and retain the rural residential nature of the area.		Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				plan will be turned into a ring road for this subdivision. We are a rural community with stock, horses, small children on bikes, dogs, dog walkers, etc and this plan will alter the whole fabric of the road and cause a significant deterioration in the rural nature of Valley Views.		
S86.002	Jayne Hewson	Whole of Plan Change	Oppose	<p>This subdivision will introduce a significant increase in traffic on the eastern side of the Manawatu River which will increase traffic on Summerhill Drive and the Fitzherbert Bridge and cause congestion, difficulty exiting Summerhill subdivision, getting off SH57 on to Aokautere Drive, etc plus problems for cyclists and pedestrians attempting to access the Summerhill shopping centre from Pacific Drive area.</p> <p>There is a need to put in place a northern Manawatu River road bridge crossing to move traffic into/through the city away from the Fitzherbert Bridge and to provide access to the city to residents in Aokautere. This will also provide better access to the hospital, airport, rail hub, north bound roads and will remove traffic from the city centre area. It would also link up with the river bike/walking trail and provide smaller loops for residents to use. This option will also provide redundancy of routes for civil defence and civil emergency and quicker access.</p>	Put in place a northern road bridge crossing the Manawatu River to move traffic and provide better access to areas of the city away from Summerhill and the Fitzherbert Bridge.	Reject
S87.001	Ashok Poduval	General - Traffic and transport	Support in part	The road infrastructure upgrades need to be completed first before any development consents are given. If development progresses without these road infrastructure upgrades, there is a greater risk of accidents and compromise of road safety. Even currently, entry and exit from Pacific Drive onto Aokautere Drive during office hours is stressful and risky as the speed limit is 70 Kmph.	<ol style="list-style-type: none"> Junction of Pacific Drive and Aokautere Drive should be a roundabout and not a signal. A traffic signal will lead to greater traffic hold ups as it is a three way intersection and not a four way intersection, so the sequencing of lights will favour traffic along /Aokautere Drive/SH57. A roundabout should suffice from a safety perspective and will assist smoother flow of traffic. 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<ol style="list-style-type: none"> 2. The current speed limit on Summehill Drive is 60 Kmph until the intersection with SH57, after which it is 70 Kmph. The speed limit should be reduced to 50 Kmph along Summerhill Drive, Aokautere Drive /SH57 until the intersection with Johnstone Drive. 3. Entry onto Aokautere Drive /SH57 from Silkwood Place and Cashmere Drive should be via a STOP sign. 4. There needs to be a roundabout and not a signal at the intersection of SH57 and Johnstone Drive for the reasons stated in (1) above. 5. There is no requirement for a roundabout at the intersection of Johnstone Drive and Pacific Drive. Most residents of Johnstone Drive exit through SH57 and not through Pacific Drive onto SH57 during office hours. A STOP sign at the intersection of Johnstone Drive & Pacific Drive will be sufficient. 6. The current cul-de-sacs need to be preserved as residents have built/purchased property based on these roads being cul-de-sacs. 	
S87.002	Ashok Poduval	General - No specific provision referenced	Support in part	I support the proposal and the specific provisions in principle, subject to certain amendments as stated in the decision that I seek from the Council.	All proposed residential construction in the areas shown in the map, particularly to the south, must be restricted to single level to maintain the aesthetic value of the neighbourhood.	Reject
S88.001	Mary-Ann Bailey	Section 32 Report - Appendix 5: Traffic Assessment	Not Stated	As a resident of Pineland Drive and a user of Turitea Road daily I am concerned about the increase in traffic on the Turitea Road. There is no real guarantee that Turitea Road will not be a competing access road if for people it becomes a	The single lane bridges on the Turitea road to become double lane and Turitea, from Old West Road to Nga Here Park Road to be widened enough to ensure the safety of cyclist and pedestrians and vehicular traffic	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				quicker or easier option. This road is quite narrow and has a lot of cyclists on it already - more may come especially if it proves a short route to where they want to go. Often I find the narrowness of the road, on coming traffic, pedestrians, horses and cyclists a very real concern to the safety of all. There is a 'shared' sign but all the sharing in the world does not take into consideration people wanting to be a places on time.	able to pass them with the confidence not to cause them harm and not to have to slow down more than a few kilometers below the 80 km speed limit.	
S89.001	Joy Vanderpoel	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	<p>1. "improvements should be made to facilitate safe right turns from SH57 Old West Road into SH57 Aokautere Drive, which could be achieved with a wider central median and longer merge lane".</p> <p>This is totally inadequate for this busy intersection which often sees vehicles backed up down Old West Road, particularly when a truck and trailer is trying to turn Right onto Aokautere Drive. With the increased traffic trying to turn Right from Summerhill Drive into Old West Road, accessing the large developments down Tiritea Rd and Valley Views, the right turn out of Old West Road will become even more problematic. An extended merge lane won't solve this.</p> <p>2. "It is recommended that Ruapehu Drive (northern end) operates with left in/ left out with an opportunity for U-turns created further to the south One possibility would be to introduce a roundabout at the Williams Terrace intersection with Summerhill Drive".</p> <p>This doesn't help the right turn out of Mountain View Road! Given that the next paragraph notes that "an option for safely accommodating cyclists travelling between the northern end of Ruapehu Drive and the City should be developed", surely traffic lights at the northern Ruapehu Drive/ Summerhill Drive intersection would be the obvious solution for both vehicles and cyclists</p>	<ol style="list-style-type: none"> 1. Amend the recommendations as they don't go far enough to mitigate the effects of increased traffic volume. 2. An extended merge lane won't solve this. This intersection [junction of SH57 Old West Road and SH57 Aokautere Drive] needs traffic lights. 3. Surely traffic lights at the northern Ruapehu Drive/ Summerhill Drive intersection would be the obvious solution for both vehicles and cyclists turning onto Summerhill Drive from both Mountain View Road and Ruapehu Drive. Consideration could also be given to the roundabout at Williams Terrace, but this would need to be additional to the traffic control option at Ruapehu Drive. 4. There is no mention of traffic control for vehicles turning right from the southern end of Ruapehu Drive. While there is currently a merging lane this is already woefully inadequate at peak times. If traffic lights are provided at the SH57 Aokautere Drive/ Pacific Drive intersection, further signalling should be included at 	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				turning onto Summerhill Drive from both Mountain View Road and Ruapehu Drive.	Ruapehu Drive and synchronised with the Pacific Drive traffic lights.	
S90.001	Colin Perrin	General - Multi-unit residential development	Oppose	<p>Visual Impact....multi unit dwellings on v. small sections right along the top of our hills. Have to be at least double storey to get them in.</p> <p>Mitigation: A. Council have a 5m setback from the Valley boundary which they reckon will be sufficient to protect the slopes...NO. That, if anything, will aggravate the instability of the slopes and cause more slips. Already some slips and lots of historical ones all along that side. 5m is just too small.</p> <p>Setback and minimum 1 ha sections will help with storm water and visual impact.</p>	<p>Setback of dwellings at least 15m from boundary as has been ruled for buildings overlooking Turitea Valley. Moonshine Valley has a Special Character designation. Turitea Valley does not and yet they have this rule and we do not. Will help a lot with Visual Impact.</p> <p>Subdivision of this farmland be restricted to a minimum of 1ha to act as a transition area from the small sections of Woodgate to the Special Character area of Moonshine Valley.</p>	Accept in part
S90.002	Colin Perrin	General - Stormwater, erosion and flooding	Oppose	<p>Storm water from the impermeable footprints of these dwellings and roads. Also any concreting on the sections which Council say will be restricted but they do not police it.</p> <p>Mitigation: Council have a 5m setback from the Valley boundary which they reckon will be sufficient to protect the slopes...NO. That, if anything, will aggravate the instability of the slopes and cause more slips. Already some slips and lots of historical ones all along that side. 5m is just too small.</p> <p>Council are putting in Retention ponds to collect all the storm water off the developments. Sited at intervals along the top of the slopes. These are to enable constant and gentle release of water. By midwinter they will be full and any rain event after that will cause flooding straight down the slopes. More instability and erosion. In addition will only take a good earthquake shake to damage these ponds, if not destroy them, and down comes a large volume of water all in one go.</p>	<p>Setback of dwellings at least 15m from boundary as has been ruled for buildings overlooking Turitea Valley.</p> <p>Subdivision of this farmland be restricted to a minimum of 1ha to act as a transition area from the small sections of Woodgate to the Special Character area of Moonshine Valley.</p> <p>Setback and minimum 1 ha sections will help with storm water and visual impact.</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				We have noticed more water in roadside drains and streams over the last couple of years and with global warming there will be more impact.		
FS18.029	Heritage Estates 2000 Ltd		Support	This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents. The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.	Accept in part That the submission is allowed	Accept in part
S90.003	Colin Perrin	General - Indigenous Biodiversity	Neutral	Erosion and silt affecting our stream is awful now. Far far worse if this subdivision allowed. Damage to aquatic life from the silt...Endangered Giant kokopu and endangered long fin eels will be badly affected. Also have short fin eels, koura, kakahi, shrimps, bullies. The stream through my property is currently good quality water with aquatic life visible.	Setback of dwellings at least 15m from boundary as has been ruled for buildings overlooking Turitea Valley. Subdivision of this farmland be restricted to a minimum of 1ha to act as a transition area from the small sections of Woodgate to the Special Character area of Moonshine Valley. Setback and minimum 1 ha sections will help with storm water.	Accept in part
S90.004	Colin Perrin	General - Traffic and transport	Oppose		With the proposed new housing and the already congested intersections, i.e. Summerhill and Old West road, please consider mitigation i.e. roundabout or similar.	Accept
S91.001	David Prisk	Section 32 Report - Appendix 5: Traffic Assessment	Support in part	While I do not oppose growth in Turitea and Aokautere, what is currently proposed is problematic. It seems as though the proposal to build approximately 1000 more houses in Aokautere has been done without properly considering the	With that said, there will need to be proper cycle lanes on Summerhill Drive and Aokautere Drive and better footpaths leading into the city. The Fitzherbert Bridge will need to be widened, or a second bridge, at least of equal size and able to accommodate foot and cycle traffic, will need to be built	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>infrastructure necessary to accomodate the people expected to live in those houses.</p> <p>Based on current use of the wholly inadequate public transport system in Palmerston North, it seems unlikely that residents of the proposed new area will use buses to get to and from the city with any greater frequency than they do now. This will be a commuter neighbourhood, and a massive increase in car traffic will be inevitable.</p>	<p>further up the Manawatu River. This does not appear to be part of the current plan. There will need to be multiple traffic lights along Summerhill Drive and Aokautere Drive, or there will need to be massive roundabouts constructed.</p>	
S91.002	David Prisk	Section 32 Report - Appendix 5: Traffic Assessment	Support in part	<p>While I do not oppose growth in Turitea and Aokautere, what is currently proposed is problematic.</p> <p>Turitea Road and Ngahere Park Road will need to be widened and improved, with proper cycle and walking lanes and proper two-lane bridges built. These roads cannot handle the traffic they have now and to imagine that there will be no spillover from the newly proposed neighbourhoods is at best wishful thinking. Cycling, tramping, and horseback riding make Turitea and Ngahere Park Roads extremely dangerous now, both for those driving cars and those using the roads for recreation; with up to 3000 more people potentially accessing these roads through a connector, it is virtually certain that someone will be seriously injured or killed if no improvements are made. These roads are in poor repair and narrow, and the bridges are ill-suited for traffic of any kind.</p> <p>This is not to criticise the idea of a road connecting these rural roads to new neighbourhoods, but to insist that the rural roads receive the care and attention necessary to make them safe. Anything less is disrespectful of those who already rely on these roads for daily travel, and all those who</p>	<p>I ask that this plan not move forward until specific, concrete plans and budgeting are provided for improvements to Turitea and Ngahere Park Roads</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				might potentially use these roads as an auxiliary route into the city or for recreation.		
S91.003	David Prisk	Section 32 Report - Appendix 10: Landscape Character Assessment	Support in part	<p>While I do not oppose growth in Turitea and Aokautere, what is currently proposed is problematic.</p> <p>It is concerning that no mention is made of improving basic services to houses already on Turitea and Ngahere Park Roads (including Kereru, Oram, and Guyland Drives). Despite being forced to view sprawling urban neighbourhoods instead of rolling hills and green paddocks, there seems to be no plan to provide compensation to these areas with city water, sewer, or fibre broadband. It seems we are being at least doubly punished for where we've chosen to live.</p>	[No specific relief sought]	Reject
S92.001	Tracey Yung	General - Rural-residential development	Oppose	<p>I believe the special character status of Moonshine Valley will be irreversibly damaged by heavy development on the land above and directly beyond the valley. Submission cites District Plan 7.3.6 Explanation, pg 19, which refers to Moonshine Valley Rural Residential Area as being identified as a special character area, and the reasons for this.</p> <p>(Actually I'd like to ask council why on earth develop up here to the density proposed when there is so much flat land available out cloverlea way or between P.Nth and Ashhurst? Why up on a hill with a single road in or out?? I don't understand at all).</p>	<p>I would like to see a set back of dwellings at least 15m from boundary. This has already been ruled for buildings overlooking Turitea Valley. As a Special Character designation here in Moonshine Valley, we should at least have the same. Turitea Valley is not a special character area and yet they have this rule. We should have it also.</p> <p>I would like to see a transition in section size as you move further from the centre of the new build area (Woodgate etc) out to the Special Character area of Moonshine Valley. I'd like to see subdivision of this farmland be restricted to a minimum of 1ha per lot. I'd also like for current interested parties in Moonshine Valley to be offered by the council the right to purchase the land directly beside/behind them. We, for one, would be very interested in purchasing the land beside and behind us. I am sure others would be the same.</p>	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
FS18.030	Heritage Estates 2000 Ltd		Support	<p>This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents.</p> <p>The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion, geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.</p>	Accept in part	That the submission is allowed	Accept in part
S92.002	Tracey Yung	General - Stormwater, erosion and flooding	Oppose	<p>Stormwater run off.</p> <p>Our section is already experiencing more flow down our hill, this water is already affecting our section. This is going to multiply ten fold once intensive development kicks in. I have read your reports and don't believe you have the solutions in place to rectify this. This is a big concern. What happens if the development does go ahead and the water collection points get full. I believe this will over flow into our sections and into the reserves we have on either side of us.</p>	I would like additional work done on water management. I want a guarantee that properties and reserves will NOT be adversely affected by the development.		Accept
S92.003	Tracey Yung	General - Indigenous Biodiversity	Oppose	<p>I read in your reports that it won't only be straight flooding and erosion destroying our special character reserves. This development WILL also affect our special character waters here in Moonshine Valley via damage from silt to our aquatic life in Moonshine Valley stream...Endangered Giant kokapu and endangered long fin eels will be severely compromised. We also host short fin eels, koura, kakahi, shrimps, bullies.</p> <p>We are part of NZ's hard worked for green corridor, I am not satisfied by what I've read that this is going to remain and flourish. That's not ok.</p>	I would like additional work done on water management. I want a guarantee that properties and reserves will NOT be adversely affected by the development.		Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S92.004	Tracey Yung	General - Traffic and transport	Oppose	I am hugely concerned about how on earth our road system up here will cope with all the additional traffic. Our roads are substandard, there is no room to expand them to add extra lanes, and the bottle neck at the bottom of Summerhill Drive is going to be crazy.	I would like a bridge from Staces Road across to the bottom of Kelvin Grove. It has been discussed many times in the past. I believe this will hugely help traffic congestion.	Reject
S92.005	Tracey Yung	Whole of Plan change - Adderstone Reserve option	Neutral	I do not like the idea of removing some of the Adderstone Reserve and building homes there. This is a dangerous precedent. A reserve is a reserve and I dont agree with altering it.	I ask for no development of Adderstone Reserve.	Accept
S93.001	Jeff Watson	Section 32 Report - Appendix 13: Parks and Reserves Servicing Memorandum	Support in part	<p>I generally support Plan Change G with the exception of the proposed changes to the Adderstone Reserve which I do not support.</p> <p>The loss of any reserve space within Palmerston North should only occur where there is a wider community good associated with the loss. In the case of Adderstone Reserve there is negligible community good to be gained via the proposed changes.</p> <p>Once this area of reserve is lost it will never be recovered and I strongly believe that Council has an important role to play in ensuring that the city structure is optimised for future as well as current generations. The optimisation of city space must include the creation and maintenance of as much green space as possible for formal (sporting) activities as well as casual recreational activities. The loss of a substantial part of Adderstone Reserve to enable the creation of a handful of Residential Lots appears to be a very poor trade-off.</p> <p>With a national desire to allow in-fill and high density housing any reserve area (large or small) becomes increasingly important as areas in which children (and adults) can enjoy the outdoors. Given the nature of most children's activities, flat</p>	<p>The changes that I seek in relation to Plan Change G are:</p> <ol style="list-style-type: none"> The removal of the proposed changes to Adderstone Reserve. The optimisation of city space must include the creation and maintenance of as much green space as possible for formal (sporting) activities as well as casual recreational activities. With a national desire to allow in-fill and high density housing any reserve area (large or small) becomes increasingly important as areas in which children (and adults) can enjoy the outdoors. Given the nature of most children's activities, flat areas are more desirable than hills and valleys. The proposed change to Adderstone Reserve removes much of the flat areas available for use within the Reserve, thus significantly reducing its suitability for a range of casual recreational uses. The adoption of all other proposed changes associated with this plan change. 	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				areas are more desirable than hills and valleys. The proposed change to Adderstone Reserve removes much of the flat areas available for use within the Reserve, thus significantly reducing its suitability for a range of casual recreational uses.		
S94.001	Gert Starker	General - Traffic and transport	Support in part	Support the plans, but this will significantly increase the traffic coming down Summerhill Drive to Palmerston North central, especially at peak traffic flow times. It already is a busy road at peak times.	I request that this junction (Summerhill Drive, Ruapehu Drive, Mountain View Road) be upgraded to a roundabout.	Reject
S95.001	Anna Berka	General - No specific provision referenced	Not Stated	<p>This urban plan sits at odds with New Zealand country's climate commitments, which require radical shift towards active transport facilitated by compact and intelligent urban design, in which key work and service destinations are no more than 15 minutes walking or cycling from the home. Given that low emission urban planning regulations are on our doorstep, and likely to necessarily be part and parcel of urban design throughout the country within the next 5 years or so - and that this as you know comes far too late as it is - and given that PNCC have at least two staff members whose entire job description to ensure we get this right - I find this very disappointing. This housing development is an opportunity to 'do it right' and put Palmy on the map with regards to best practice. This housing development will be with us indefinitely, and any future structural redesign or retrofitting will come with a hefty price tag.</p> <p>Along this line of thought: - the plan does not prioritise land use efficiency through compact urban design: the majority of the development is medium density suburban standalone houses. This is at odds with your own projections for increased demand in single and double occupant housing in Palmerston North.</p>	Clarification as to how this development will affect the PN Climate Strategy and aligns with the National Emission Reduction Plan.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S95.002	Anna Berka	General - Traffic and transport	Neutral	<p>This urban plan sits at odds with New Zealand country's climate commitments, which require radical shift towards active transport facilitated by compact and intelligent urban design, in which key work and service destinations are no more than 15 minutes walking or cycling from the home.</p> <p>Along this line of thought, the plan: - Fails to acknowledge existing cycling behaviour from the Aokautere area to Massey and into town. Most cyclists commuting to school or work will take either Cashmere Drive - Cliff Road, or they may take Ruapehu Drive and join Summerhill Drive on its descent to the bridge, because it is far safer and shorter than cycling along Aokautere/Summerhill Drive. It is important to note that Aokautere Dr/Summerhill Drive is in its current form absolutely not considered a safe travel route for cyclists, because of proximity of vehicles, speeding, glass and car parts on the roadside, and will remain so unless you build in a cycle path that is physically separated from vehicles using the main road.</p> <p>If your intention is increase cycling uptake, and make it accessible to parents with children, which the PNCC climate strategy would necessitate - it may make more sense to make these interior routes dedicated cycling routes, removing the blockade at the end of the Cliff Road which currently forces cyclists to dismount and walk through it. The proposal to convert Ruapehu/Summerhill Drive intersection into a left in left out only intersection will only add to cyclists frustration. It is currently very difficult to get on to Summerhill Drive during peak traffic.</p>	Whether you will reallocate the dedicated cycling route from Aokautere/Summerhill Drive to interior routes via Ruapehu Drive and Cashmere/Cliff Road and amend your plans to improve these cycleways accordingly.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S95.003	Anna Berka	General - Traffic and transport	Neutral	<p>This urban plan sits at odds with New Zealand country's climate commitments, which require radical shift towards active transport facilitated by compact and intelligent urban design, in which key work and service destinations are no more than 15 minutes walking or cycling from the home. Given that low emission urban planning regulations are on our doorstep, and likely to necessarily be part and parcel of urban design throughout the country within the next 5 years or so - and that this as you know comes far too late as it is - and given that PNCC have at least two staff members whose entire job description to ensure we get this right - I find this very disappointing. This housing development is an opportunity to 'do it right' and put Palmy on the map with regards to best practice. This housing development will be with us indefinitely, and any future structural redesign or retrofitting will come with a hefty price tag.</p> <p>Along this line of thought, the plan:</p> <ul style="list-style-type: none"> - Is not centred around a integrated plan for non-motorised transport that considers how public transportation, walking, biking and public transit will work together to enable residents to easily access key school, work and service destinations. - Makes virtually no attempt to reduce private vehicle use (though urban layout, efficient public transport networks, and transport demand management). 	Clarification as to how this development will affect the PN Climate Strategy and aligns with the National Emission Reduction Plan.	Reject
S96.001	Anne Ridler	Section 32 Report - Appendix 5: Traffic Assessment	Not Stated	<p>Appendix 5, page 26: 5.2 Cashmere Drive/Aokautere Drive: This section appears to state that there is no requirement to build a right-turning bay from SH57 into Cashmere Drive, or have a merging lane for those turning right out of Cashmere Drive. I disagree with this assessment and submit that a right- turning bay should be built from Aokautere Rd into Cashmere Dr for 3</p>	<p>I would like PNCC to ensure a right-turning bay is built from Aokautere Drive into Cashmere Drive. Ideally, a merge lane for those turning right from Cashmere Dr onto Aokautere Dr would also be incorporated. A right-turning bay would make it safer for cyclists coming into the city along Aokautere Rd to turn right onto Cashmere Drive. An</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>reasons:</p> <p>1. Turning right into Cashmere Dr is currently dangerous. When heading west on Aokautere Rd it is common to be in a string of traffic as everyone gets stuck behind a slow vehicle going up the hill which then speeds up on the flat. This means there is a good chance you will have a closely-following vehicle (or not uncommonly, be getting actively tail-gated) by the time you get near the turn into Cashmere Dr. You then come around a semi-blind corner just before the turn so have limited time to evaluate oncoming traffic and hence make a decision about whether you can make the turn quickly, sit in the middle of the busy road (often with oncoming trucks) or pull left and wait until it is clear in both directions. If the latter option is chosen, because of the semi- blind corner, pulling back onto the road is not without hazards. Despite careful use of the right indicator and brake lights I have nearly been rear-ended a couple of times while attempting this manoeuvre. It seems ludicrous that a tiny cul-de-sac like Silkwood Pl has a right-turning bay when Cashmere Dr does not. Aokautere Rd is only going to get busier, which will exacerbate the issue.</p> <p>2. The Council aim is to encourage more commuting via bicycle. By far the most pleasant and safest bike route to the city or to Massey is to bike down Cashmere Drive, turn right onto Vaocluse and then link onto Cliff Rd (NB Summerhill Dr for cyclists is hazardous, smelly, noisy and covered in broken glass; a proper cycle lane as proposed will still not fully address these issues). A right-turning bay would make it safer for cyclists coming into the city along Aokautere Rd to turn right onto Cashmere Drive. An underpass would be even better for this purpose but that might be a bit too optimistic.</p>	<p>underpass would be even better for this purpose but that might be a bit too optimistic.</p>	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				3. The traffic assessment to provide evidence for the decision was apparently done 18 months ago; Cashmere Dr has become busier since then and will become more so due to the development of Vacluse Drive.		
S97.001	Manawatū Branch of Forest & Bird	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	<p>We appreciate there is a need to build more housing in Palmerston North and we are grateful for the extensive work that has been done by PNCC and by Rangitāne including efforts to ensure positive environmental outcomes. Our concerns for the environment are heightened in the light of the unpredictable nature and the increasing severity of climate change and the dire plight of many of our species under threat.</p> <p>Management of water flows: While consideration has been given to managing water flows, we support the recommendation that the developer (ref GHD stormwater management strategy pg 37) is required to develop a plan demonstrating compliance with the stormwater plan design criteria and concepts.</p>	We also feel that it is important to use the most up to date information and future proof this plan as far as possible. This is to best meet future needs that might occur with the unpredictable nature and increased severity of climate change events.	Accept
S97.002	Manawatū Branch of Forest & Bird	General - Stormwater, erosion and flooding	Support in part	We have significant concerns about the volume of sediment that will be produced during site preparation.	We ask for more to be done to prevent this (e.g., working in very small sections at any one time to minimise exposed soil, and constructing more wetlands and stormwater retention systems (and other strategies) well before development starts so stormwater and sediment can be dealt with before any increases occur.	Accept in part
S97.003	Manawatū Branch of Forest & Bird	General - Stormwater, erosion and flooding	Support in part	Additional stormwater flow into the area, and particularly to Moonshine Valley, due to the large housing development area. Strong and clear provisions are required to prevent this occurring.	We would expect hydraulic neutrality, therefore we ask that water sensitive design and nature-based solutions be used to address potential issues if the plan change is approved. These should be requirements of the plan change and should exist as conditions on the resource consent. That	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					<p>would mean:</p> <ol style="list-style-type: none"> 1. Houses must have stormwater retention tanks, and that water should be accessible for garden-watering/emergency use (not just as surge tanks). 2. Impermeable surfaces should be minimised (and limits put on this at a %per site and % across suburb level). 3. Raingardens should be required on berms and in a proportion of gardens (rather than just grass). These should use native plant species. 4. Porous paving should be used in driveways and wherever else possible. 5. Other mechanisms such as infiltration trenches, sandfilters, settlement traps, tanks, ponds, and green roofs should be considered. 6. Wetlands should be constructed in addition to those that are already present (if any are present). 7. The width of river corridors should be maintained (i.e.,rivers should not be 'stabilised' or channelised), and buffers increased. Development in or around the floodplain/zone of any streams should be prohibited. 8. All stormwater drains should be clearly labelled "flows to river and sea"(or something similar). Rubbish capture devices and filters should also be used where possible. 9. Carwashing on the street/driveways (or anywhere 	

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					water may drain to stormwater) should be prohibited in this suburb.	
S97.004	Manawatū Branch of Forest & Bird	General - Stormwater, erosion and flooding	Support in part	Additional stormwater flow into the area, and particularly to Moonshine Valley, due to the large housing development area. Strong and clear provisions are required to prevent this occurring.	Additional monitoring and requirements should be used to proactively improve water quality and river habitat, rather than monitoring and waiting for degradation to occur.	Accept
S97.005	Manawatū Branch of Forest & Bird	General - Stormwater, erosion and flooding	Support in part	We note there is an assessment of the stormwater plan against the Horizons One- Plan and the draft plan change, but there is no assessment against the NPSFM (2020) and the idea of Te Mana o te Wai, and no assessment against the PNCC stormwater bylaw, which was recently updated (last year) to recognise Te Mana o Te Wai.	This assessment needs to be done.	Accept
S97.006	Manawatū Branch of Forest & Bird	Section 32 Report - Appendix 11: Stormwater Management Strategy	Support in part	There is a suggestion that "stream stabilisation within the gullies" (ref GHD stormwater management strategy pg 34) might be needed. We are opposed to this concept as rivers and streams need room to move and to develop naturally and should be given space to do so (as per our comments above about river corridors and restricting development on floodplains). Hence the development needs to stay well away from them and give them a large buffer (this also means they can flood safely). It's much harder to retreat from a stream if you've developed to close to it. If streams might need stabilising to deal with more water coming from stormwater, then the stormwater retention proposals are insufficient and more needs to be done, i.e., more planning is needed to produce less runoff. If council is lacking expertise in this area, we recommend consulting with local experts at Massey University's Innovative River Solutions Centre.	The plan change should have designated river corridors that provide plenty of space for waterways and limit development in these areas.	Accept in part
S97.007	Manawatū Branch of Forest & Bird	General - Indigenous Biodiversity	Support in part	Maintenance of existing ecosystems.	Bush areas should be recognised as SNAs and protected with covenants too (if they aren't already). Proactive restoration and extension of these areas should be included	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
					as a condition of the plan change.	
S97.008	Manawatū Branch of Forest & Bird	General - Indigenous Biodiversity	Support in part	This has been successful in other new developments (such as a development in Hamilton, where such a ban was introduced to protect a local population of Pekapeka bats). This would ensure the valleys of native bush can continue to support native wildlife and are not degraded by the presence of cats roaming in and killing birds (which will happen).	We request a ban on cat ownership in the suburb.	Reject
S97.009	Manawatū Branch of Forest & Bird	General - No specific provision referenced	Support in part	We note that owning a lifestyle block is a luxury that is inappropriate in a world where pressure on land is becoming greater and productive land is becoming more scarce.	We support higher density development with low physical and environmental footprints and urge the council to reconsider this sprawling and inefficient land use. We would much rather see denser developments with areas of grass restored into wetlands or native bush, for biodiversity and carbon sequestration, as well as for the enjoyment from the community.	Accept in part
S98.001	Sara Burgess	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	<p>There is little detail on proposed cycleways. The current cycle way on Summerhill has not been designed well with cars still being able to park beside the coffee cart which means cyclists have to pull into the middle of the road. How will the cycle way pass safely in front of the old west road intersection? There have been numerous near misses between two cars and between cars and cyclists (both my husband and I have nearly been hit on our bicycles at this intersection) when biking along this road into town and a car is turning right from Old West Road into Summerhill. A wider and longer median line would not address this issue.</p> <p>Traffic lights would be ideal in terms of safety but would this mean traffic jams along Summerhill Drive with the increased traffic volume going into town?</p>	To encourage residents to cycle, cycleways should be completely separate from the road where cars are not able to park. Do not use roundabouts at intersections as cyclists find these dangerous. A traffic light should be placed at the Old West Road / Summerhill intersection.	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				Ruapehu Drive has been proposed as an alternative option for cyclists, if this goes ahead how will cyclists cross Summerhill Drive with the increased traffic volume? At present it is already very difficult to cross. A round-about has been suggested in the proposal but cars often don't see cyclists at roundabouts. A separate cycleway would be needed that doesn't use the same round-about as cars.			
S98.002	Sara Burgess	General - Multi-unit residential development	Oppose	The proposed multi story dwellings on the the skyline will visually impact the special character area of Moonshine Moonshine Valley Road.	I would prefer no additional housing to go above Moonshine Valley Road. However, at a minimum the proposal should have have dwellings setback at least 15m from the edge of the hill overlooking Moonshine Valley (as already done in Turitea Valley), with a minimum subdivision of 1ha to transition from residential to small lifestyle blocks found in Moonshine Valley.		Accept in part
S98.003	Sara Burgess	General - Stormwater, erosion and flooding	Oppose	Storm water will increase and will run off and damage the waterways and gullies around Moonshine Valley. Erosion and slips is already evident since development on the hill in both Tutukiwi Reserve and the smaller Moonshine Valley Reserve.	I would prefer no additional housing to go above Moonshine Valley Road. However, at a minimum the proposal should have have dwellings setback at least 15m from the edge of the hill overlooking Moonshine Valley (as already done in Turitea Valley), with a minimum subdivision of 1ha to transition from residential to small lifestyle blocks found in Moonshine Valley.		Accept in part
FS18.031	Heritage Estates 2000 Ltd		Support	This group of submitters generally oppose PC-G on the basis that the effects of the proposed plan change on the environment are unclear based on the technical information available to submitters in the notified documents. The technical information relied on to produce the erosion, geotechnical, and stormwater reports in support of PC-G provide insufficient base information to enable the submitter to peer review the interrelated effects of erosion,	Accept in part	That the submission is accepted	Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				geotechnical and stormwater and its effects on ecology prior to the call of evidence for PC-G.		
S98.004	Sara Burgess	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	In Appendix 5 it states there will be increased traffic and that this can be mitigated by getting people to use buses and cycles more but there is no detail on how they will get more people to use buses and cycles. The development would add 8000 car trips per day with only one main road into town from Summerhill Drive into Fitzherbert Ave this will become one of the busiest with the most traffic in Palmerston North.	[No specific relief sought]	Reject
S99.001	Heather Turnbull	Whole of Plan change - Adderstone Reserve option	Oppose	I have lived in Abby Road for over 20 years and observed a huge increase in the number of people using this reserve for many different activities: eg exercising and training dogs, families playing ball and flying kites etc. they come here because there is enough space to do this and the other areas close by are too small, which shows we still need these larger area's especially with the spreading of urban growth.	Page 3 Partial Reserve Disposal for Housing of Adderstone Reserve: I support option 1: which shows the reserve retained to current extent with housing running along side of it.	Accept
S99.002	Heather Turnbull	Whole of Plan change - Adderstone Reserve option	Neutral	Abby Road is not wide enough to cater for the extra traffic which would be required. If cars are parked on either side of the road only one car can go through.	That Adderstone reserve is retained to its current extent.	Reject
S100.001	Cristopher Joven	General - No specific provision referenced	Not Stated	No reasons provided.	No decision requested.	Reject
S101.001	Paul Hewitt	General - No specific provision referenced	Support in part	Generally support the proposal.	There are no state schools in the urban area on this side of the river. These need to be provided.	Reject
S101.002	Paul Hewitt	General - Open space and recreation	Support in part		I would like to see the provision of sports fields in this development and associated community facilities.	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S101.003	Paul Hewitt	General - Rural-residential development	Support in part	The lifestyle zone in Turitea Valley consumes a lot of land for each residence.	Better utilisation of this land would be made of it if it were added to the urban growth proposal. A lifestyle block could contain 12-15 houses per hectare.	Reject
S101.004	Paul Hewitt	General - Traffic and transport	Support in part		Better footpaths are needed on main roads from the CBD to this suburb. Summerhill Drive urgently needs a footpath on both sides of the road as does Aokautere Drive.	Reject
S101.005	Paul Hewitt	General - Aokautere Neighbourhood Centre	Support in part		The proposed shopping centre straddles a primary road. It needs to be repositioned to one side of the road to reduce conflict between pedestrians and traffic.	Reject
S101.006	Paul Hewitt	General - Traffic and transport	Support in part	Some of the roading proposals need a rethink. Summerhill Drive and Aokautere Drive are only two lane roads. These roads will at some point reach capacity. Aokautere Drive is already a through state highway and will in due course become part of the urban ring road.	Some of the roading proposals need a rethink. For example it is unrealistic to consider left turns only at one end of Ruapehu Drive. If implemented it would create a nightmare scenario for shoppers at the existing shopping centre and a large number of residents living in Ruapehu Drive, Cashmere Dive Kilkenny etc. There needs to be provision made to upgrade these roads [Summerhill Drive and Aokautere Drive] to become four lane roads. There needs to be provision to provide a bypass for the State Highway, like is being planned at Levin. Once residential development has occurred adding an alternative corridor will become exceedingly difficult.	Accept in part
S102.001	Robert Gardner	Section 32 Report - Appendix 5: Traffic Assessment	Oppose	I oppose the provision that Cashmere Drive/Aokautere Drive intersection is and will remain safe for all users without: 1 - provision of a right turn bay in and out of Cashmere Drive; 2 - complete stabilisation of the bank opposite the intersection; 3 - improved sight lines looking left from	<ol style="list-style-type: none"> 1. Provide an option to design and complete right turn bays in and out of Cashmere Drive. 2. Retain and stabilise bank to prevent constant ongoing slips past 20 years. 3. Improve sight lines to left at exit to Cashmere Drive. 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				Cashmere Drive; 4 - secure land opposite intersection to achieve above.	4. Secure land opposite intersection to achieve above.	
S103.001	Flygers Investment Group Ltd	R10.7.4	Oppose	<p>Flygers Investment Group Ltd has recently been through a lengthy hearing process to determine a Private Plan Change for the Whiskey Creek Residential Area.</p> <p>The Whiskey Creek Residential Area will be an additional Greenfield Residential Area. The hearing is now closed and the panel is preparing their recommendation. As part of the process there was considerable expert conferencing of planners in relation to the wording of policies and rules for the area. To a very large extent the planners agreed on the plan provisions and this is recorded in various Joint Witness Statements and Joint Reports.</p> <p>The submitter was therefore very surprised to find that Proposed Plan Change G includes provisions that directly affect the rules applying to the Whiskey Creek Residential Area and were not revealed to the plan change requestor, submitters or to the Hearing Panel as part of the hearing process.</p> <p>The matter relates to the insertion of extensive design related assessment criteria at R 10.7.4.6 (k) that apply to all Greenfield Residential Areas with only the last part specifically cross referencing to transport network requirements for the Aokautere Residential Area.</p> <p>We understand that the proposed Structure Plan includes an option for a Retirement Village within the area and that has led to these proposed Assessment Criteria.</p> <p>The submitter considers that these assessment</p>	That R10.7.4.6 be deleted or if retained in any form is confined to the Aokautere Residential Area.	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>criteria are inappropriate for the Whiskey Creek Residential Area and any criteria added to the Plan by way of PC G should be limited to the Aokautere Residential Area only.</p> <p>Even if they were to apply, the submitter considers that they have potential to conflict with the design requirements of retirement villages.</p>		
S104.001	Arvida Group Ltd	R10.7.4	Oppose	<p>Our understanding is that the Plan Change was specifically designed to facilitate urban growth within Aokautere. We understand there has been a Retirement Village option put forward with associated provisions to ensure the design of any retirement village meets the key principles and intended outcomes of the Aokautere Structure Plan.</p> <p>The s32 report goes on to discuss these new provisions as being the most efficient and effective way to enable a retirement village in the Aokautere residential area that meets the objectives of the plan change, specifically Objective 15.</p> <p>The submitters concern lies with the implications of the proposed amendments to Section 10 of the Greenfield Residential Area and, as currently drafted, will apply to all retirement villages in Greenfield Residential Areas. Based on the contents of the s32 report, we assume that this was not intentional as no assessment of this wider implication has been made as required under s32 of the RMA.</p> <p>Particularly, the submitter is concerned with the Assessment Criteria in Rule 10.7.4.6. PC-G has been proposed with a Structure Plan developed with a high-level of detail, informed by a Master Plan. It includes options for a retirement village within the Aokautere Structure Plan.</p>	<p>The submitter requests that the assessment criteria under Rule 10.7.4.6 (k) apply to the Aokautere Residential Area only where development is informed by a Masterplan. The submitter requests that the assessment criteria under Rule 10.7.4.6 (k) does not apply to other Greenfield Residential Areas.</p> <p>Should the assessment criteria under Rule 10.7.4.6 (k) apply in other Greenfield Residential Areas the design principles for each relevant Structure Plan should be clearly articulated, as this is not presently the case for either the Whakarongo Residential Area or the Kikiwhenua Residential Area (only the Whiskey Creek Private Plan Change). A decision-making framework should also be enable the consideration of appropriate deviations and/or alternatives to the Structure Plan where it is consistent with and/or achieves the relevant design principles.</p>	Accept

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				<p>Other Structure Plans relevant to Greenfield Development Areas include:</p> <ul style="list-style-type: none"> a. The Whakarongo Residential Area Structure Plan; b. The Kikiwhenua Residential Structure Plan; and c. The Whiskey Creek Structure Plan (currently being decided by Commissioners). <p>The assessment criteria requires retirement villages to be:</p> <ul style="list-style-type: none"> a. "located as shown on any relevant structure plan and/or precinct plan". This is only relevant to the Aokautere Growth Area. b. "the roading and street layout as shown on the relevant structure plan and/or precinct plan"; and c. "consistent with the design principles described for that Greenfield Residential Area in section 7A of the District Plan". This applies to all development within the Greenfield Residential Area (as per Policy 2.1 - Section 7A); and, in relation to the proposed Design Principles in the Whiskey Creek Residential Area (Policies 2.8 and 2.9 of the Private Plan Change). The submitter is not aware of any other design principles that apply, specific to the Whakarongo or Kikiwhenua Residential Structure Plan. <p>The submitters concern remains that the provisions seek to retrofit retirement villages into the pattern "as shown" on structure plans which appear to have been originally developed based on conventional residential subdivision patterns. These structure plans have not had prior consideration of the specific characteristics of retirement villages, including: the range/diversity of activities (such as hospital care facilities, club-houses and other facilities/amenities etc); the mixed building/unit typologies; smaller net site areas, sections depths etc; specific functional needs of retirement villages etc.</p>		

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested		Decision
				<p>The assessment criteria dictate prescribed solutions "as shown on the relevant structure plan". This is inconsistent with the matters of discretion for subdivision in the Greenfield Residential Zone under Rule 7A.5.2.1 which considers "the extent to which subdivision and development is in general accordance with the relevant Structure Plan for the area".</p> <p>Furthermore, this approach differs, for example, from the proposed provisions in the Whiskey Creek Plan Change (Policy 2.9) which enables a decision-making framework for consideration of a development which is not in general accordance with the relevant structure plan.</p>			
FS14.001	Palmerston North City Council		Support	Proposed assessment criteria (k) under Rule 10.7.4.6 was only intended to apply to the Aokautere Residential Area. The plan drafting as notified unintentionally extended the scope to other greenfield areas.	Accept	That the assessment criteria under Rule 10.7.4.6 (k) only apply to the Aokautere Residential Area.	Accept
S105.001	Bruce Wilson	Section 32 Report - Appendix 5: Traffic Assessment	Support in part	<p>(i) Appendix 5 (Transport) recommends mitigation at a range of locations pages 34-33, locations 1-4.</p> <p>I make my observations based on running and cycling up and down Summerhill Drive from 1980 to the present time, residing at Aokautere from 2001 to 2020, representing the area as a City Councillor from 2007 to 2013, and being Chair of the PNCC Hearings Committee and an RMA Commissioner.</p> <p>As I presently understand the recommended mitigations for locations 3 and 4 I have deep reservations about whether these proposals are likely to be safe for pedestrians or cyclists, or willingly accepted by motorists, although I agree</p>	That the Transport Management proposals not be approved in their present form, and that adequate regard be given to the nature and timing of the mitigation measures after thorough consultation with suitable representatives of the three basic user groups.		Accept in part

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
				that the current situation at each location needs to be changed.		
S105.002	Bruce Wilson	Whole of Plan Change	Support in part	<p>In general, I support the intentions of the proposed plan change.</p> <p>At this time I do not find that I have enough information to support some of the proposals, especially in relation to transport, landscape and stormwater matters.</p>	Having watched some unplanned land movements in the Plan Change area following adverse weather events, I would seek to be satisfied that the proposals are likely to accommodate the type of rainfall event such as experienced in the Nelson-Marlborough region in August 2022.	Accept
S106.001	Catherine Sims	Whole of Plan change - Adderstone Reserve option	Neutral	I live on Turitea Road and will be affected by the traffic that will be severely increased at the intersection of Turitea Road and Fitzherbert Road East. I support the increase in housing since Palmerston North requires more housing in the future. However I am extremely concerned that the infrastructure for traffic management has not been considered a priority.	<ol style="list-style-type: none"> 1. Another bridge! (As was considered 20 years ago and rejected) 2. A roundabout at the top of Turitea Road? 3. Considerable thought given to the traffic infrastructure management before the reserve is started. 	Reject
S107.001	Prabandha Samal	General - No specific provision referenced	Oppose	<p>The green background, mountain & windmill views behind my Johnstone Drive home are lovely and a delight to watch. The Rural ambience is something to behold. In today's world, life is busy and fast-paced, which is nicely offset by the rural settings Aokautere offers with the tranquility and perfect relaxed atmosphere to rest and recover at home. Aokautere has a rural setting with a natural beauty and uniqueness that should be protected and preserved.</p> <p>The landscape and scenic views that attracted us to live in this picturesque neighbourhood will be lost by the proposed new developments obscuring our scenery completely.</p> <p>The house at xx Johnstone Drive was built facing east to capture the scenic beauty of the ranges. The development of new houses with north-facing houses will lead to complete loss of privacy, apart from congestion and crowding.</p>	<p>The decision to have more houses behind Johnstone Drive should be abandoned. Instead, lining up with trees and walkways would be an option that would go a long way in beautifying the area and maintaining the rural setting, tranquility and scenic beauty of Aokautere.</p> <p>Undertake further consultation once revised plans are put in place.</p>	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S107.002	Prabandha Samal	General - Indigenous Biodiversity	Oppose	<p>If the proposed plan is put to action, then natural flora and fauna including native bird life (such as Tui, Pukeko, wax-eye, robin) and shrubbery will be adversely impacted.</p> <p>The proposed development plans will adversely impact pollination enabled by insects in the area that contribute to propagation of our wildlife.</p>	All of the gullies should be protected as they are a significant natural features to Aokautere. The gully's are the beautiful characteristics of the contour of the land, views, trees, wildlife and openness.	Accept
S107.003	Prabandha Samal	General - Traffic and transport	Oppose	The current levels of traffic on the roads around Aokautere is already so heavy that its leading to high wear and tear, resulting in lots of pot holes, unevenness, overall poor road quality compromising safety on roads, increasing maintenance of cars, and impacting on environment and sustainability.	[No specific relief sought]	Reject
S107.004	Prabandha Samal	General - No specific provision referenced	Oppose	<p>There will be more noise pollution all around, including increased construction activities, soil levelling etc.</p> <p>The proposed development will adversely impact on the surrounding natural landforms. There will be significant Earthworks construction leading to dust and noise pollution.</p>	Provide details on how exactly the the gully/low-lying areas behind Johnstone Drive will be filled and made into buildable areas.	Accept in part
S107.005	Prabandha Samal	General - No specific provision referenced	Oppose	<p>The proposed development will adversely impact on the surrounding natural landforms. The open space and gully behind Johnstone Drive will be lost.</p> <p>The PNCC needs to be forward thinking. This is the 21st century and we need to protect our environment for future generations. All of the gullies should be protected as they are a significant natural features to Aokautere. The gully's are the beautiful characteristics of the contour of the land, views, trees, wildlife and openness.</p>	<ol style="list-style-type: none"> The decision to have more houses behind Johnstone Drive should be abandoned. Instead, lining up with trees and walkways would be an option that would go a long way in beautifying the area and maintaining the rural setting, tranquility and scenic beauty of Aokauteere. Provide details on how exactly the the gully/low-lying areas behind Johnstone Drive will be filled and made into buildable areas. Undertake further consultation once revised plans are put in place. 	Reject

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision
S107.006	Prabandha Samal	General - No specific provision referenced	Oppose		Review the proposed plan. The plans to have a Rest Home may go ahead.	Accept

APPENDIX 2

Annotated version of Plan Change provisions

The notified Aokautere Growth Area provisions as revised by this decision are annotated as follows:

<p><u>Example 1</u> and <u>Example 2</u> and <u>Example 3</u> and <u>Example 4</u></p>	<ol style="list-style-type: none">1. The notified additions to the District Plan provisions which are accepted by this decision are shown in black bold underlined text.2. The notified deletions to the District Plan provisions which are accepted by this decision are shown in black, bold text with a strike through.3. Where we as panel have made deletions to the notified provisions these are shown in blue bold underlined text with a strike through.4. Where we as a panel have made additions to the notified provisions these are shown in blue bold underlined text.
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