

## SO 1-1

### District Plan Change E - Roxburgh Crescent Residential Area

|  |  |
|--|--|
| Your contact details   |  |
| First name   | Sean   |
| Last name  | Monaghan   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |  |
| Postal address   | 38 Bourke Street   |
| Email  | <a href="mailto:seanmonaghan38@gmail.com">seanmonaghan38@gmail.com</a>                 |
| Phone<br>Please provide a daytime contact number   | 021 401487   |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment;<br>and<br>(b) does not relate to trade competition or the effects of trade competition.   |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |
| State the specific part of Plan Change E that your submission point relates to.<br><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>   | Objective 11: To ensure that subdivision within the Roxburgh Residential Area proceeds |
| What's your attitude towards this specific part of Plan Change E?  | Oppose   |

## SO 1-2

|   |   |
|---|---|
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> | <p>Delete.</p>  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>  | <p>I've noticed that as the city grows, the quality of life diminishes as the city becomes noisier, busier and harder to get around, and similarly, the environment degrades. The city should look at some of the clever and prosperous ways to degrow to improve the quality of life and of the environment.</p> |
| <p>You can attach documents in support of your submission point</p>   |   |

## SO 2-1

### District Plan Change E - Roxburgh Crescent Residential Area

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|--|--|
| Your contact details   |  |
| First name   | Sophie   |
| Last name  | Boulter  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |  |
| Postal address   | 33 Newcastle St, Hokowhitu   |
| Email  | <a href="mailto:sophie_boulter@hotmail.com">sophie_boulter@hotmail.com</a> |
| Phone<br>Please provide a daytime contact number   | 02109076192  |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |

## SO 2-2

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|---|--|
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>  | <p>Proposed Plan Change E – Roxburgh Crescent Residential Area</p>   |
| <p>What's your attitude towards this specific part of Plan Change E?</p>  | <p>Amend</p>   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> | <p>Amend/oppose to reconsider the impact on school zones.</p>  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>  | <p>While I understand and support new housing options as there is high demand in Palmerston North. As a parent of primary age children and having just considered school zoning for intermediate school, have you considered the school close to this area that the houses will be in zone for. Winchester school is already a highly subscribed school and if 150+ houses are built in that area it is likely a significant percentage will have primary school age children. What provisions will be put in to support the school in this situation? What would be the predicted increase in children living in the school zone at any one time. The same question also applies for the intermediate and high school that are zoned for this area. Could another school be considered in the area?</p> |
| <p>You can attach documents in support of your submission point</p>   |  |

SO -3-1

District Plan Change E - Roxburgh Crescent Residential Area

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|--|---|
| Your contact details   |   |
| First name   | Luke  |
| Last name  | Hiscox  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |   |
| Postal address   | 94 rongopai street  |
| Email  | <a href="mailto:lukehiscox.lh@gmail.com">lukehiscox.lh@gmail.com</a>  |
| Phone<br>Please provide a daytime contact number   | 0278644233  |
| Trade competition  |   |
| Would you gain an advantage in trade competition through this submission?  | No  |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |   |
| Hearing  |   |
| Do you want to speak to Council in support of your submission?   | No  |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |   |
| Your submission  |   |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |   |
| State the specific part of Plan Change E that your submission point relates to.  | Its great to open this up for more residential, but I would like to see the height limits as high as possible. Its a gorgeous area to |

SO -3-2

|   |  |
|---|--|
| <p><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>  | <p>live and is well served by existing infrastructure. 3 stories across the whole area please.</p>   |
| <p>What's your attitude towards this specific part of Plan Change E?</p>  | <p>Support</p>   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> | <p>3 stories across the whole area please.</p>   |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>  | <p>As above - housing is needed in Palmerston North, its an appropriate place for higher buildings, and the rationale to lower some of them doesnt stand up.</p> |
| <p>You can attach documents in support of your submission point</p>   |  |

## SO -4-1

### District Plan Change E - Roxburgh Crescent Residential Area

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|---|--|
| Your contact details  |  |
| First name  | Jack   |
| Last name   | McKenzie   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.   |  |
| Postal address  | 53 Buick Cres  |
| Email   | <a href="mailto:webgeek.nz@gmail.com">webgeek.nz@gmail.com</a> |
| Phone<br>Please provide a daytime contact number  | +64274284041   |
| Trade competition   |  |
| Would you gain an advantage in trade competition through this submission?   | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition. |  |
| Hearing   |  |
| Do you want to speak to Council in support of your submission?  | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?   |  |
| Your submission   |  |
| Submission table - Submission point 1   |  |

SO -4-2

|  |  |
|--|--|
| <p>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.</p> |  |
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>   | <p>12A Roxburgh Crescent classification</p>  |
| <p>What's your attitude towards this specific part of Plan Change E?</p>   | <p>Support</p>   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>  | <p>Retain your proposal</p>  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>   | <p>I support council's proposals. The height restrictions seem about right to me. More than one level is necessary to make better use of land, but more than two or three (as per the proposal) would be excessive and against the general "nature" of the city. We need more higher density housing and the proposal is at the right level.</p> |
| <p>You can attach documents in support of your submission point</p>  |  |



SO -5-1

District Plan Change E - Roxburgh Crescent Residential Area

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|---|--|
| Your contact details  |  |
| First name  | Brigid   |
| Last name   | Holmes   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.   |  |
| Postal address  | 6 Hind Place   |
| Email   | <a href="mailto:brigid@manawatuhealthandsafety.co.nz">brigid@manawatuhealthandsafety.co.nz</a> |
| Phone<br>Please provide a daytime contact number  | 0272982911   |
| Trade competition   |  |
| Would you gain an advantage in trade competition through this submission?   | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition. |  |
| Hearing   |  |
| Do you want to speak to Council in support of your submission?  | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?   |  |

SO -5-2

|  |  |
|--|--|
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |
| State the specific part of Plan Change E that your submission point relates to.<br><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>   | Heights and density  |
| What's your attitude towards this specific part of Plan Change E?  | Amend  |
| What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i>  | Removal of 3 story dwellings   |
| Please tell us the reasons for your submission point.<br><i>For example, these height controls are set too low as they restrict development potential.</i>   | I support 3 story dwellings if developed by private developers/home owners. No high density social housing. Having social housing close to the river access would create risk for our river users and nearby schools with the mental health and social issues which accompany social housing. Please clarify the view point of council in the high density / 3 story builds of this development and if there is the potential for this to hold social housing. |
| You can attach documents in support of your submission point   |  |

**From:** Submission  
**Subject:** FW: Proposed Plan Change E - Roxburgh Residential Area

## SO - 6

### District Plan Change E - Roxburgh Crescent Residential Area

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**From:** Ed V <krebs1979@gmail.com>  
**Sent:** Friday, 1 November 2024 12:25 pm  
**To:** Submission <submission@pncc.govt.nz>  
**Subject:** Proposed Plan Change E - Roxburgh Residential Area

Dear PNCC,

I am strongly **against** the proposal to transform Roxburgh into a residential area, with 105 new houses, as the current infrastructure is wholly inadequate to support this development, especially when all the units are introduced simultaneously.

#### 1. Traffic and safety concerns

For starters, my main concern is that Roxburgh Crescent will rely heavily on Ruahine Street for access. According to Transport New Zealand data, the vehicle ownership rate is 889 cars per 1000 people, suggesting that with 105 homes (consisting of an average of 2 adults per home), there could be at least **187 additional cars** on Ruahine Street. This influx is likely to create significant congestion and poses increased safety risks, particularly for the main entrance of Winchester School, which already experiences heavy congestion during school hours. As a nearby resident, I have frequently observed speeding along Ruahine Street, which combined with additional traffic, will exacerbate these risks and reduce road safety.

In addition, this area already experiences considerable traffic, especially during peak hours, as it connects to key routes and residential areas. The planned development of 105 homes is expected to add hundreds of additional vehicle trips daily, which could lead to congestion and heightened safety risks at the Pahiatua and Ruahine-Manawatu intersection, with increased bottlenecks that will result in delays and potentially hazardous conditions as vehicles queue and merge. Without significant investment in traffic management, I worry that such an influx will pose a real risk to all road users.

#### 2. Strain on local education resources

Another equally pressing issue is the fact that Winchester School, the nearest primary school, is currently operating at full capacity. Based on the 2018 Census data indicating 1.3 children per household, the proposed development could add an estimated **137 children** to the local primary school demand, which Winchester and Hokowhitu Schools will be forced to accommodate, regardless of whether they are physically able to or not. While this is primarily a Ministry of Education issue, rapid residential growth without a phased approach or consideration of school capacities could drastically impact the quality of education in the community.

### 3. Lack of recreational and community facilities

The surrounding area around Roxburgh Crescent currently lacks sufficient parks, playgrounds, and recreational facilities, which are crucial for the well-being of families, particularly ones with young children. Families moving into these 105 new homes would likely seek nearby play and recreational areas, but without these amenities in place, the Council would need to consider the additional costs and space required to meet these needs. The absence of nearby facilities could negatively impact the quality of life for incoming residents and place undue stress on existing ones nearby, which may not have the capacity to support a sudden influx of new residents.

### 4. Environmental impact on local reserves

The new development is located right next to the reserve - a natural space that residents from all over Palmerston North rely on for recreational activities and a connection to the outdoors. Increasing the density of housing so close to this area could compromise the natural landscape and reduce the peaceful experience that the reserve offers. Furthermore, with more people accessing the reserve, it is likely that erosion, littering (already a problem with the current river access on Ruahine Street), and general wear and tear on pathways and natural habitats will increase. This could degrade the quality of the reserve over time, detracting from the enjoyment of the wider community and reducing the effectiveness of green spaces as a community resource.

### 5. Strain on local businesses and shops

The nearby shops and small businesses in the area may also struggle to meet the sudden surge in demand from hundreds of new residents. Local stores, cafes, and other facilities are not likely prepared to handle such a large population increase without reducing their quality of service, increasing prices, or needing to invest in larger infrastructure. Such impacts could lead to long wait times, shortages of goods, and overall stress on the local economy, affecting both new and existing residents. A phased approach, would therefore, allow businesses to adapt gradually rather than face a sudden shock to their demand.

### 6. Potential solution - a phased approach

I respectfully request that the Council reconsider the scale and pace of this project. A phased construction approach would allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth. The proposal, if implemented as currently planned, would severely disrupt the residential ecosystem, impacting the quality of life for existing residents. Housing shortages are indeed pressing; however, solutions should not come at the expense of community well-being, safety, or environmental quality. I have spoken with several neighbours who share similar concerns, reflecting widespread apprehension about this development.

Sincerely,  
Edrei Valath  
021 108 1725

## SO -7-1

### District Plan Change E - Roxburgh Crescent Residential Area

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|--|--|
| Your contact details   |  |
| First name   | Patrick  |
| Last name  | Henderson  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |  |
| Postal address   | 8A Sterling Crescent Palmerston North  |
| Email  | <a href="mailto:patrickhenderson1@gmail.com">patrickhenderson1@gmail.com</a> |
| Phone<br>Please provide a daytime contact number   | 220319556  |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |

SO -7-2

|  |   |
|--|---|
| <p>State the specific part of Plan Change E that your submission point relates to.<br/> <i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>  | <p>I agree with the broader concept but feel strongly the houses should be first time buyers with an agreement if sold the council had first option for further use for first home buyers</p>   |
| <p>What's your attitude towards this specific part of Plan Change E?</p>   | <p>Amend</p>  |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/> <i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> | <p>Amend re above</p>   |
| <p>Please tell us the reasons for your submission point.<br/> <i>For example, these height controls are set too low as they restrict development potential.</i></p>  | <p>There is not enough low cost first time buyer homes in Palmerston North. There are too many high value large homes being built such as the new houses at the lagoon and old Massey site near by the old teacher training college</p> |
| <p>You can attach documents in support of your submission point</p>  |   |

**SO - 7-3**

**District Plan Change E - Roxburgh Crescent Residential Area**

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**From:** Patrick Henderson <patrickhenderson1@gmail.com>  
**Sent:** Monday, 4 November 2024 10:18 am  
**To:** Submission  
**Subject:** Proposed Plan Change E- Roxburgh Residential Area

Dear Sirs

We would like to make a submission that although we support this plan we believe the housing should be covenanted to only permit low cost housing for first home buyers and not trusts, to buy these properties with a 5 year clause before they can be resold. Before this date they should be sold back to the Council.

We were saddened to see the developments round the lagoon went to high cost homes and that there is no low cost housing in the current lagoon development which this city desperately needs and the proposed development in Roxburgh Crescent would help rectify some of the housing shortage.

Patrick

Patrick Henderson  
8A Sterling Crescent .  
Sent from my iPad

## SO – 8-1

### District Plan Change E - Roxburgh Crescent Residential Area

|   |  |
|---|--|
| Your contact details  |  |
| First name  | Robert   |
| Last name   | Hodgson  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.   |  |
| Postal address  | 40 Ashford Avenue, Hokowhitu, Palmerston north 4410                        |
| Email   | <a href="mailto:rmsbhodgson@inspire.net.nz">rmsbhodgson@inspire.net.nz</a> |
| Phone<br>Please provide a daytime contact number  | 02108392106  |
| Trade competition   |  |
| Would you gain an advantage in trade competition through this submission?   | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.   |  |
| Hearing   |  |
| Do you want to speak to Council in support of your submission?  |  |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?   |  |
| Your submission   |  |
| <p>Submission table - Submission point 1</p> <p>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.</p> |  |
| State the specific part of Plan Change E that your submission point relates to.<br><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>  |  |
| What's your attitude towards this specific part of Plan Change E?   |  |



SO -8-2

|   |  |
|---|--|
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> |  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>  |  |
| <p>You can attach documents in support of your submission point</p>   |  |

## SO 8-3

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**From:** Robert Hodgson <rmsbhodgson@inspire.net.nz>  
**Sent:** Thursday, 31 October 2024 4:15 pm  
**To:** Submission  
**Subject:** Roxburgh Reserve Declaration and Classification.

### **Roxburgh Reserve Declaration and Classification.**

I am generally supportive of the proposal however I am concerned that in a time of climate change, increased river flows and frequency of major floods, that a conservative approach is taken to the design, location and resilience to flooding of the new housing. It should be better in these respects than the established developments.

Robert M Hodgson  
Distinguished fellow Engineering New Zealand.



**Submission on a Plan Change to the Palmerston North City District Plan Clause 6 of First Schedule - Resource Management Act 1991.**

Date:

TO:

Palmerston North City Council  
Private Bag 11034  
Palmerston North 4410  
Attention: Manager - Governance

FROM:

Preferred Title: **Waid Crockett, Chief Executive**  
Full Name of submitter: **Palmerston North City Council**  
Plan Change Number: **E**  
Plan Change Name: **Roxburgh Residential Area**

Signature:

**1. Gain or affect**

a. Could you gain an advantage in trade competition through this submission? **No**

**2. The specific provisions of the Plan Change my submission relates to are as follows:**

**Appendix 1: District Plan Provisions**

a. Copper and Zinc provisions

Introduction of new provisions relating to the use of copper and zinc roofing, guttering and building materials

b. References to Stormwater treatment

Rule 7.6.2.6 d. Road Corridor

Map 7.10A Rooding Cross Section

Map 7.10B Rooding Cross Sections for area marked 'D' (Centre of site) on the structure plan in Map 7.10

c. Policy 17.3.

d. Minimum floor levels in Rule 10.6.1.8 b.

e. Permeable surfaces – Guidance Note under Rule 10.6.1.8 d.

**3. My submission is that:**

Following further discussions with Rangitāne and Council's stormwater team post Council approval to notify, there are a small number of provisions identified that could be improved by further refinement. The provisions are outlined below as are the reasons for the recommended changes. The changes will provide plan users with greater clarity and certainty in the future when implementing the District Plan provisions.

## SO 9-2

### a. Copper and zinc roofing, guttering and building materials

The Palmerston North City Council seeks to include provisions for the Roxburgh Residential Area relating to the use of copper and zinc roofing, guttering and cladding materials. These products, when not sealed or otherwise finished to prevent runoff that contains copper and zinc particles, can have an impact on downstream water sources.

The National Policy Statement for Freshwater Management, clause 3.5 (4) states

*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.*

Council therefore has a responsibility to ensure that where copper and zinc roofing, guttering and building materials are used in urban development that these products are sealed, or that these products are treated to prevent these contaminants from entering the stormwater network.

The recommended provisions do not stop building developers from using these products, nor does it dictate what building materials must be used. Rather the recommended provisions require that where they are used in future development these products are to be treated to avoid the discharge of these contaminants to downstream watercourses, which in this instance is the Manawatū River.

The recommended provisions in this submission are consistent with the approach Council is taking for Proposed Plan Change I: Medium Density Residential Zone which will be notified in the near future. Including these provisions will ensure consistency and maintain District Plan integrity.

### b. References to Stormwater Treatment

Rule 7.6.2.6 d)(iii) of the Rule provides a specific measurement for stormwater treatment, however is not appropriately qualified. Based on the Stormwater Servicing Assessment, the 1 m<sup>2</sup> of treatment per 270 m<sup>2</sup> of contributing area is based on the use of a Filterra System, which is a rapid stormwater filtration device. That is, the media in the stormwater pit / device is designed to treat more efficiently than other biofiltration devices.

By not appropriately quantifying the need for a rapid stormwater filtration device within the provisions this could result in alternative treatment devices being used and significantly undersized, thereby resulting in poor outcomes and not meeting the intended objectives. Council recommends that the wording in the rule be revised to appropriately qualify the metric presented in the rule, providing the metric as an example for a specific treatment device, or removing the metric and make the rule more generic. The latter would require a review of the proposed treatment device and sizing as part of the Resource Consent, however would provide the Applicant with alternatives to treatment.

Alongside Rule 7.6.2.6, the Roading Cross Sections also require amendment. The cross-sections provided in Maps 7.10A and 7.10B reference a "biofiltration stormwater pit to service 270m<sup>2</sup> road reserve area". The metric given is specific to a Filterra Tree Pit, or similar rapid stormwater biofiltration device. The callout should therefore be modified to either include the word "rapid" in the callout, or remove the reference "to service 270m<sup>2</sup> road reserve area".

### c. Policy 17.3

Policy 17.3 has been included to provide guidance for consenting where the permeability performance standards are not met. Based on the Stormwater Servicing Assessment, the network is at capacity and cannot accommodate additional flow. Attenuating the flow

## SO 9-3

will not mitigate the effects of the increase in impervious area. A change is recommended in Policy 17.3 to delete attenuation and replace with retention to better reflect the issue.

### **d. Performance Standard referring to floor levels**

The Performance Standard references a minimum floor level based on the 0.5% annual exceedance probability (AEP) flood event. This area is located within the Horizons stop banks and protected from such an event, therefore the minimum floor level required should be as per the wider residential area within the city. That is, the minimum floor level should be based on the 2% AEP (or the 1 in 50-year flood event) with an appropriate freeboard. This is also consistent with the Building Act requirements.

Horizons One Plan states at NAZ-NH-P10.5:

- *"Within that part of the Palmerston North City Council district that is protected by the Lower Manawātū River Flood Control Scheme to a 0.2% AEP (1 in 500 year) standard, including the Mangaone Stream stopbank system, additional flood hazard avoidance\* or mitigation measures will generally not be required when establishing any new structure\* or activity or increasing the scale of any existing structure\* or activity."*

The Policy above states that additional flood hazard avoidance or mitigation measures will generally not be required. Council has further considered this direction and notes that a 2% AEP and reasonable freeboard to allow for site-specific considerations has generally been applied within the City. It is noted that the Hokowhitu Lagoon area has a specific RL reference identified through the District Plan given the specific characteristics and location of the lagoon to the development. A change is recommended to reference the 2% AEP or 1 in 50 year event with reasonable freeboard to ensure consistency within the District Plan. The notified performance standard does not require climate change and must be taken into consideration. This is an omission and should be included in the performance standard.

### **e. Performance Standard referring to permeable surfaces**

In the Guidance Note under Rule 10.6.1.8.d there is a reference relating to the lack of detention areas being the reason for the permeability requirement. As outlined in the Stormwater Servicing Assessment, the permeability requirement stems from the network capacity and the sites location within the wider catchment. Detention is not an acceptable mitigation measure for this development area. It is therefore recommended that the wording in the Guidance Note be amended to provide additional clarity that detention is not a feasible option to achieve the onsite permeability required.

## **4. I seek the following decisions from the Palmerston North City Council:**

### **a. Copper and Zinc provisions**

Add a new policy under Objective 15 in the Residential Zone as follows:

Policy 15.7 The effects on water quality of copper and zinc entering the stormwater system from use as roofing, guttering and building materials are mitigated through the use of appropriate treatment.

Add a new performance standard under Rule R10.6.1.8 Dwellings within the Roxburgh Residential Area as follows:

m) Where new buildings and structures, or additions and alterations to existing buildings and structures, use copper or zinc cladding and/or roofing materials (including guttering and spouting) these materials are sealed or otherwise finished to prevent water runoff which contains copper or zinc.

## SO 9-4

Amend Rule 10.6.3.1 Buildings or structures that do not comply with performance standards for permitted and controlled activities as follows:

### **Any building or structure which does not comply with the performance standards for Permitted or Controlled Activities in relation to**

...

xviii Copper and zinc building materials in Rule 10.6.1.8 m)

are Restricted Discretionary Activities with regard to:

...

- How stormwater from copper and zinc building materials will be treated to prevent these contaminants from entering the stormwater network.

### **b. Reference to Stormwater Treatment**

Amend Rule 7.6.2.6(d) Road corridor as follows:

(ii) How water sensitive design elements have been incorporated to manage stormwater quantity based on one (1) square metre of rapid stormwater biofiltration pit being provided per contributing catchment area of 270m<sup>2</sup>.

Amend the callout for the stormwater treatment device on Map 7.10A as follows:

Rapid bBiofiltration stormwater pit to service 270m<sup>2</sup> road reserve area

Amend the callout for the stormwater treatment device on Map 7.10B as follows:

Rapid bBiofiltration stormwater pit to service 270m<sup>2</sup> road reserve area

### **c. Policy 17.3**

Amend Policy 17.3 as follows:

Policy 17.3: To require that where permeability limits are not achieved, onsite measures are provided and demonstrated to achieve stormwater attenuation retention at the same rate as the required permeability area.

### **d. Floor levels**

Amend Rule 10.6.1.8(b) Floor Levels as follows:

Floor levels must be above the flood and stormwater inundation level predicted for a 0.5%~~2%~~ annual exceedance probability (AEP) (1 in 200 50-year) flood event (including allowance for climate change), plus 350mm reasonable freeboard for dwellings and dwelling units (including attached garages).

### **e. Rule 10.6.1.8(d) Permeable Surfaces**

Amend the wording as follows:

Guidance Note: Given the Roxburgh Residential Area is at the bottom of the stormwater catchment, the lack of detention areas to attenuate stormwater within the site in a location near the outlet to the river, and the current size of the outlet, detention is not a feasible option to achieve the there are few alternatives to providing the onsite permeability required. Council may impose consent notices on property titles at subdivision stage to enforce this standard.

**5. Do you wish to be heard in support of your submission? Yes**

**6. If others make a similar submission would you be prepared to consider presenting a joint case with them at any hearing? No**

## SO - 10-1

### District Plan Change E - Roxburgh Crescent Residential Area

|   |  |
|---|--|
| Your contact details  |  |
| First name  | Jason  |
| Last name   | Temperley  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.   |  |
| Postal address  | 44 Newcastle street, Hokowhitu                                 |
| Email   | <a href="mailto:itdesignnz@gmail.com">itdesignnz@gmail.com</a> |
| Phone<br>Please provide a daytime contact number  | 211803485  |
| Trade competition   |  |
| Would you gain an advantage in trade competition through this submission?   | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition. |  |
| Hearing   |  |
| Do you want to speak to Council in support of your submission?  | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?   |  |
| Your submission   |  |
| Submission table - Submission point 1   |  |

**SO -10-2**

|  |   |
|--|---|
| <p>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.</p> |   |
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>   | <p>Proposed Roxburgh Crescent Structure Plan.</p>   |
| <p>What's your attitude towards this specific part of Plan Change E?</p>   | <p>Amend</p>  |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>  | <p>Increase in minimum lot size and no build / stormwater easement zones.</p>   |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>   | <p>The minimum lot size for the amount of stories or occupants may create a too dense a housing development to fit in well with the surrounding neighborhood. My main concern is the available outdoor space for things like a garden, hanging the washing, off street parking, back yard cricket, or toddlers having a safe outdoor space to explore at home or somewhere to collect your garbage. 250m Square is not an adequate space for a two storie home or for a family. Another point to the density of housing is the impact it will have on traffic in the surrounding area. Albert St, and Ruahine Street are the only main routes out, which are already overly congested at peak times. NB: there are no Stormwater easments or no build zones shown on Figure 1. Of the proposed plan. Which is a concern as surface flooding is a recurring issue.</p> |
| <p>You can attach documents in support of your submission point</p>  |   |



# **SO 11-1**

## **PALMERSTON NORTH CITY DISTRICT PLAN**

### **FORM 5**

#### **SUBMISSION ON PROPOSED PLAN CHANGE E TO THE PALMERSTON NORTH CITY DISTRICT PLAN**

**Pursuant to Clause 6 of the First Schedule - Resource Management Act 1991**

**To: Palmerston North City Council  
Private Bag 11034  
Palmerston North 4410**

**ATTENTION: Team Leader – Governance and Support**

**Name of Submitter: Frances Holdings Ltd.**

**This is a submission on Proposed Plan Change E to the Palmerston North City District Plan: Roxburgh Residential Area.**

**The parts of the Plan Change that the submission applies to are:**

The whole Plan Change.

The specific provisions of proposed Plan Change E that this submission relates to, the substance of the submission and the decisions requested are as follows.

#### **Background:**

Frances Holdings Ltd (FHL) is the successor company to Higgins Family Holdings Ltd. It is the largest property owner in the Roxburgh Residential Area and is a major stakeholder in this Plan Change process.

FHL owns the properties at 8, 21, 22, 32 & 34 Roxburgh Crescent and 559, 565, 567A, 573 & 575 Ruahine Street. It also owns 571A Ruahine Street which is presently zoned residential and is included within the Plan Change Area. FHL also have an agreement to purchase 2706m<sup>2</sup> from Horizons Regional Council who own 12 Roxburgh Crescent. These properties are shown on the attached plan.

FHL has had regular liaison with Council officers during the lengthy period to get the Plan Change to this point.

## **SO 11-2**

FHL in general supports Plan Change E but has a number of specific matters of concern which are set out in this submission.

FHL considers overall that the Section 32 Assessment and associated reports are comprehensive and well compiled.

FHL, however, has the following specific concerns:

### **Stormwater Management**

1. Section 5.3.1 of the Section 32 Evaluation Report presented to Council misrepresents the Stormwater Servicing Assessment undertaken by GHD Ltd. The Plan Change area is currently 100% impervious. There will not, therefore, be increased flows generated from the site as a consequence of redevelopment. The assessment shows that there is a capacity shortfall in the wider catchment network which is proposed to be addressed through the construction of a larger outfall. The assessment states that an increase in permeability will improve service levels. However, given the existing ground conditions the feasibility of this is in doubt. It will also be restrictive in terms of residential design opportunities for the area.
2. FHL also considers that there may be other acceptable solutions in terms of water sensitive design other than permeable surfaces and on-site attenuation. This includes soak pits which may be individual or constructed as part of the reserve development. This may also be an alternative for road stormwater as well as individual properties.
3. FHL submission is that:
  - the permeability standards in Rule 10.6.1.8 (d) be deleted.
  - Policies 17.2, 17.3 and 17.4 be deleted or amended to reflect the submission above.

### **Road Cross Sections**

4. Two specific road cross sections have been proposed where new roads will be required. FHL has concerns about the ability of the 13m wide road to function properly within this residential development. The existing width of Roxburgh Crescent is 12.80m. FHL submits that the cross section be redrawn to that width. FHL also submits that cross section shows where the 2 Power & 2 Telecom ducts, 2 Gas mains, 2 watermains, Sewer

## SO 11-3

(pressure or gravity), Stormwater, 2 subgrade drains, street trees, biofiltration and the street lighting will fit within this 12.80m wide corridor.

5. FHL also has concerns the function of the road cross section for vehicles. FHL requests a plan view showing the tracking curves of vehicles entering and exiting a 10m wide lot, how large vehicles will manoeuvre around the 90° bends, and any no parking lines. If suitable plans cannot be provided, we request that the 12.8m cross section be revised accordingly. We note that there is an error in the WSP Transport Assessment namely Figure 4-8 which states that the photo is an example of a 13m wide corridor. We measure that road width at 14m which is 1.2 m wider than Roxburgh Crescent.
6. Regarding the 20.5m wide cross section we query the need for the number of car parks shown. The WSP Transport Assessment does not include any assessment of the number of carparks needed to satisfy any visitors to the reserve and any residential overspill parking. We request that the cross section be amended to show parallel parking rather than perpendicular carparks.

### Lot Size

7. The proposed Lot size standard is a minimum of 250 m<sup>2</sup> and a maximum of 500 m<sup>2</sup>. FHL considers that is generally appropriate, however, site planning is showing that in a few cases a larger section may be necessary. It is, therefore, submitted that the maximum lot size be increased to 600 m<sup>2</sup>.

### Number of Buildings per Lot

8. R10.6.1.8 proposes that the number of buildings per lot shall be no more than
  - a) One dwelling unit on 250 m<sup>2</sup>
  - b) Two dwelling units on 500 m<sup>2</sup>

This is unworkable as written and needs to be amended to a range of lot sizes within the lot size standard. The submission above seeks an increase in the maximum size to 600 m<sup>2</sup>. FHL therefore submits that this standard be amended to read:

- a) *One dwelling unit on lots of 250 m<sup>2</sup> to 400m<sup>2</sup>*
- b) *Two dwelling units on lots of 400 m<sup>2</sup> to 600m<sup>2</sup>*

### Structure Plan

9. FHL has worked with the Council on the Structure Plan for Roxburgh. However, there are some specific aspects that it seeks amendments to. FHL submits that the proposed Structure Plan is overly prescriptive and gives no room for future flexibility. It dictates

## **SO 11-4**

the width of each road, the internal cross section of each road and the overall roading pattern. It essentially defines all the parameters of any subdivision other than the dimensions of the sections.

10. In particular FHL seeks:

- Deletion of the proposed pedestrian and cycle access to Ruahine Street
- Amendment to the cross section for Road D to delete the on street right angle parking and replace with parallel parking.
- The use of Right of Ways or cul-de-sacs if better outcomes are achieved
- The ability to easily amend the Structure Plan
- The relocation of the existing stormwater pipe in the no build area, as shown on the structure plan, to the center road.

11. FHL in conjunction with the above seeks amendment to the relevant policies relating to these matters. This includes Policy 11.2 which should be qualified by the addition of *“unless a better design outcome is achieved.”*

12. A further structure plan concern relates to the proposed reserve. The Council has approval from the Department of Conservation that this reserve be an exchange for an existing reserve located west of Tilbury Avenue. This is supported in principle. However, until the land exchange has been executed this cannot be confirmed. FHL submits that this be addressed before the plan change is approved.

### **Other Plan Provisions**

13. In addition to the above, FHL has a number of concerns regarding the efficiency and effectiveness of the proposed Plan provisions. These relate in general terms to the drafting of the proposed objectives policies, methods and rules.

14. In specific terms:

#### **Chapter 7 Subdivision**

Policy 11.1 is considered better suited to being Objective 11, with the Objective 11 (b)(c) and (d) parts being moved to the policies.

Policy 11.4 includes methods that should be relocated to the Methods Section.

Policy 11.5 is not supported in terms of pervious surfaces for the reasons above. Further it is a Method and not a Policy.

## **SO 11-5**

Policy 11.7 is not supported where it relates to on site permeability for the reasons above.

Rule R7.6.2.6 second bullet regarding general accordance with the Structure Plan is not a matter of discretion and should be deleted.

### **Chapter 10 Residential**

Policy 16.1 is not needed in the Residential section as this is determined at subdivision consent and is already in Section 7.

Policy 16.3. The wording of this policy is unclear and requires clarification through improved wording.

Policy 17.3 be deleted on the basis that neither permeability standards nor attenuation are required given the commitment to the new outfall infrastructure.

R10.6.1.8 (d)

Delete this permeability standard on the basis that it is not required.

R10.6.5.6

Delete the proposed non complying rules relating to permeable surfaces on the basis that it is not justified.

R10.7.4.12. Amend the regime for non residential activities to reflect proposed Policy 15.5. This should be based on a restricted discretionary consent where it is in the locations identified by an improved Policy 16.3 and discretionary consent elsewhere.

### **The submitter wishes to be heard in support of this submission.**

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

## **SO 11-6**

**Signed by Paul Thomas** (on behalf of Frances Holdings Ltd):

A handwritten signature in blue ink, appearing to be 'Paul Thomas', written over a light blue rectangular background.

..... **Date: 14 November 2024**


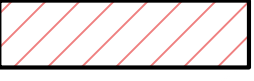

**Address for service:**

**Paul Thomas  
Thomas Planning Limited  
2A, Jacobsen Lane  
Ngaio  
Wellington 6034**

**Telephone: 04 4795034 or 027 4534816**

**Email: [paul@thomasplanning.co.nz](mailto:paul@thomasplanning.co.nz)**

**LEGEND**

-  PROPERTIES OWNED BY FRANCES HOLDINGS LTD
-  LAND TO BE PURCHASED
-  PNCC EXCHANGE RESERVE LAND

SO 11-7



TO BE PURCHASED FROM HORIZON'S REGIONAL COUNCIL

PNCC EXCHANGE RESERVE LAND

ROXBURGH CRES

21 ROXBURGH CRES

571A RUAHINE ST

RUAHINE STREET



100  
50  
25  
0  
A3 ORIGINAL SIZE mm

J:\2002\17217346 Higgins ROXBURGH CRESCENT DEVELOPMENT.PN\_KBJ\05 Surveying\Drawings\217346 - Frances Holdings Properties.dwg 11/12/2024 3:45 p.m.

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|     |                     |          |      |
| P1  | ISSUED FOR APPROVAL | 12/11/24 |      |
| Rev | Details             | Drawn    | Date |



The Contractor shall check all dimensions on site.

71 Pitt Street, PO Box 600 Palmerston North  
06 356 7000 info@resonant.co.nz  
www.resonant.co.nz

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PROPERTY OWNERSHIP  
ROXBURGH CRES & RUAHINE STREET  
PALMERSTON NORTH

PROPERTY BOUNDARIES PLAN  
FRANCES HOLDINGS LTD

|          |          |       |
|----------|----------|-------|
|          | Initials | Date  |
| Surveyed |          |       |
| Designed | KBJ      | 11/24 |
| Drawn    | JWW      | 11/24 |
| Checked  | KBJ      | 11/24 |
| Approved |          |       |

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| DO NOT SCALE. If in doubt ask for dimensions |       |         |        |
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| 217346 - Frances Holdings Properties         | 1     | 1       |        |
|  |       |         | Rev.   |
|  |       |         | P1     |

**SO 12**  
**District Plan Change E - Roxburgh Crescent Residential Area**

---

**From:** Paul and Annette Gregg <paulannettegregg@gmail.com>  
**Sent:** Friday, 15 November 2024 5:56 pm  
**To:** Submission  
**Subject:** Proposed plan change E-Roxburgh Residential area.

I am not opposed to the plan but it provides a great opportunity for the Council to demonstrate that they are making provision for possible retreating in the future from flooding. This would mean houses being built on piles rather than concrete pads. I look forward to hearing the final outcome.

Yours faithfully,  
Paul Gregg (Dr)



## SO - 13-1

### District Plan Change E - Roxburgh Crescent Residential Area

|  |  |
|--|--|
| Your contact details   |  |
| First name   | Gillian  |
| Last name  | Anderson   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  | Health New Zealand, Te Whatu Ora. Te Ikaroa, Central Region Public Health                            |
| Postal address   | 200 Broadway Avenue   Private Bag 11-036   Palmerston North  |
| Email  | <a href="mailto:gillianm.anderson@midcentraldhb.govt.nz">gillianm.anderson@midcentraldhb.govt.nz</a> |
| Phone<br>Please provide a daytime contact number   | 0272620333   |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |

**SO – 13-2**

|  |   |
|--|---|
| <p>State the specific part of Plan Change E that your submission point relates to.<br/> <i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>  | <p>Please see the written submission from Health NZ</p>   |
| <p>What's your attitude towards this specific part of Plan Change E?</p>   |   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/> <i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> | <p>That we become an affected party and are able to review the development plans and remediation plans for this subdivision</p> |
| <p>Please tell us the reasons for your submission point.<br/> <i>For example, these height controls are set too low as they restrict development potential.</i></p>  | <p>To protect Public Health</p>   |
| <p>You can attach documents in support of your submission point</p>  |   |

19 November 2024

Palmerston North City Council  
Private Bag 11034  
Manawatū Mail Centre  
Palmerston North 4442

Tēnā koe,

## Rezoning of Roxburgh Crescent

Thank you for the opportunity to provide a written submission on Palmerston North City Council's proposal to rezone Roxburgh Crescent.

This submission has been written by Health New Zealand | Te Whatu Ora National Public Health Service (Health NZ) in the MidCentral district. The National Public Health Service is a directorate within Health NZ. Health NZ believes the submission process provides an opportunity for public health perspectives to be considered by Council in planning and decision making. Incorporating public health aspects helps to support the health and wellbeing of our communities.

Health NZ has statutory obligations under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956 to improve, promote and protect the health of people and communities. Of particular focus for Health NZ is embedding Te Tiriti o Waitangi as its foundation toward improving health outcomes for Māori.

The feedback provided in this submission aligns to Health NZ's commitment towards healthier and more resilient communities by reducing inequities and promoting good health, particularly for Māori, Pacific peoples and disabled people.

For any clarification regarding the submission, please contact Health Protection Officer Gillian Anderson [gillianm.anderson@midcentraldhb.govt.nz](mailto:gillianm.anderson@midcentraldhb.govt.nz).

Ngā mihi,



### Paula Snowden

Ngāpuhi ki Whāingaroa

**Regional Director, Te Ikaroa - Central****National Public Health Service**[TeWhatuOra.govt.nz](https://www.TeWhatuOra.govt.nz)

Private Bag 11036, Manawatū Mail Centre  
Palmerston North 4442  
Waea pūkoro: +64 6 350 9110

**Te Kāwanatanga o Aotearoa**  
New Zealand Government

## Request for consideration as an affected party

Health New Zealand (Health NZ) has an interest in contaminated land on which housing developments are proposed. Hazardous activities and industries are listed on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL). Hazardous activities and industries, as referenced in HAIL, have been located on the proposed Roxburgh Crescent development site, as noted in both Tonkin and Taylor contamination assessments.<sup>1,2</sup> These reports identify that metals and asbestos have been found at levels that will require remediation at several sites.

Asbestos fibres in soil can be mobilised into the air when disturbed, even by the simple act of mowing a lawn.<sup>3</sup> Inhalation of asbestos can cause serious health problems including asbestosis, lung cancer and mesothelioma.<sup>4</sup> Metals will each have their own health risk profile and exposure can cause a range of health issues. In a subdivision, exposure to metals in contaminated soil could be in the form of ingestion of soil, ingestion of home-grown products, inhalation of soil or dust, or absorption through the skin.<sup>5</sup>

Health NZ acknowledges Council's proposal to require land developers to submit a plan that will show an overall development plan and how the site will be remediated.

Health NZ would like to be considered an affected party when these plans are assessed by Council. Consultation on the development plans and site remediation will enable Health NZ to be sure that public health is being protected.

## References

<sup>1</sup> Tonkin & Taylor Ltd. (2019). *Roxburgh Crescent – Ground Contamination Desk Study*. <https://www.pncc.govt.nz/files/assets/public/v/1/documents/have-your-say/roxburgh-crescent/technical-assessments/appendix-f.-contamination-report-psi.pdf>

<sup>2</sup> Tonkin & Taylor Ltd. (2020). *Report on Ground Contamination Assessment*. <https://www.pncc.govt.nz/files/assets/public/v/1/documents/have-your-say/roxburgh-crescent/technical-assessments/appendix-g.-contamination-report-dsi.pdf>

<sup>3</sup> BRANZ. (2017). *New Zealand Guidelines for Assessing and Managing Asbestos in Soil*. Australasian Land and Groundwater Association. <http://www.asbestosconsultants.co.nz/uploads/1/0/9/0/109062717/nz-guidelines-for-assessing-and-managing-asbestos-in-soil.pdf>

<sup>4</sup> Health New Zealand (Health NZ). (2024a, November 7). *Asbestos and your Health*. <https://info.health.nz/keeping-healthy/environmental-health/hazardous-substances/asbestos/asbestos-and-your-health>

<sup>5</sup> Health NZ. (2024b, November 7). *Contaminated Soil*. <https://info.health.nz/keeping-healthy/environmental-health/hazardous-substances/contaminated-soil>

## SO 14-1

### District Plan Change E - Roxburgh Crescent Residential Area

| Your contact details   |  |
|--|--|
| First name   | Philip   |
| Last name  | Nell   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  | P.N.Engineering Ltd  |
| Postal address   | 25 Roxburgh Crescent Hokowhitu                               |
| Email  | <a href="mailto:phil.pne@xtra.co.nz">phil.pne@xtra.co.nz</a> |
| Phone<br>Please provide a daytime contact number   | 06 3540238   |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | Yes  |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  | Yes  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |

**SO - 14-2**

|   |   |
|---|---|
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>  | <p>We occupy and work from 2 units at 25 &amp; 25A on the western side of Roxburgh Crescent<br/>My submission relates to concerns about the changes to the existing road layout and how that may impact our current use and access to the site.<br/>As we have the two units, there are two access points, each of about 4m wide on the northern and southern sides of the site and in between them we have off street parking for staff. From time to time we have deliveries and pickups from large trucks which happens along the site frontage.<br/>Currently there is no curbing on the western side of the road which makes the site access for staff and freight convenient.</p> |
| <p>What's your attitude towards this specific part of Plan Change E?</p>  |   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> | <p>Consider the current use of the owners and business occupiers in the road layout changes and the timing of this work</p>   |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>  | <p>Continued site access and parking .</p>  |
| <p>You can attach documents in support of your submission point</p>   |   |

## SO 15-1

### District Plan Change E - Roxburgh Crescent Residential Area

|  |  |
|--|--|
| Your contact details   |  |
| First name   | Grant  |
| Last name  | Higgins  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |  |
| Postal address   | 377 Albert StreetHokowhitu   |
| Email  | <a href="mailto:ghiggins72@gmail.com">ghiggins72@gmail.com</a>   |
| Phone<br>Please provide a daytime contact number   | 272778426  |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | Yes  |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  | Yes  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |
| State the specific part of Plan Change E that your submission point relates to.<br><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>   | Planning maps  |
| What's your attitude towards this specific part of Plan Change E?  | Support  |
| What decision are you seeking from the Council?<br>Retain? Amend? Delete? Please specify.  | Flexibility in the structure plan.<br>Less intensive development lot size, so a minimum lot size of 350m2 is upheld. |

**SO - 15-2**

|  |  |
|--|--|
| <p><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>                                 |  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p> | <p>Flexibility in structuring planning is important; change may be required to make a development fit.<br/>Less intensive development in the area will help to mitigate stormwater and traffic effects</p> |
| <p>You can attach documents in support of your submission point</p>  |  |



## SO 16-1

### District Plan Change E - Roxburgh Crescent Residential Area

|  |  |
|--|--|
| Your contact details   |  |
| First name   | Danielle   |
| Last name  | Harris   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  | Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre  |
| Postal address   | 140-148 Maxwells Line, Palmerston North                                    |
| Email  | <a href="mailto:danielle@rangitaane.iwi.nz">danielle@rangitaane.iwi.nz</a> |
| Phone<br>Please provide a daytime contact number   | 021414720  |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | Yes  |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  | Yes  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |
| State the specific part of Plan Change E that your submission point relates to.<br><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>   | Please see attached file   |
| What's your attitude towards this specific part of Plan Change E?  | Support  |
| What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.   | Please see attached file   |

**SO - 16-2**

|  |                                 |
|--|---------------------------------|
| <p><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>                                 |                                 |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p> | <p>Please see attached file</p> |
| <p>You can attach documents in support of your submission point</p>  |                                 |



# **PROPOSED PLAN CHANGE E: Roxburgh Crescent Residential Area**

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

## **SUBMISSION TO**

PALMERSTON NORTH CITY COUNCIL  
PRIVATE BAG 11-034  
PALMERSTON NORTH 4410

**ATTENTION:** THE GOVERNANCE TEAM

## **SUBMITTER INFORMATION**

**Ingoa** TE AO TUROA ENVIRONMENTAL CENTRE

**Iwi** RANGITĀNE O MANAWATŪ

**Wāhi noho** 140-148 MAXWELLS LINE  
AWAPUNI  
PALMERSTON NORTH

**Īmēra** DANIELLE@RANGITAANE.IWI.NZ

**Waea pūkoro** 06 353 1881

**Kaiwhakahaere** D.P. HARRIS, O.N.Z.M, LLB, PGDIPBUSADMIN  
CHIEF EXECUTIVE OFFICER

## SO 16-4

### OUR SUBMISSION:

This is a submission by Te Ao Turoa Environmental Centre on behalf of Rangitāne o Manawatū on the Roxburgh Crescent Residential Area plan change proposal.

Te Ao Turoa Environmental Centre **wishes to be heard** in support of this submission.

If others make a similar submission, we **will consider** presenting a joint case with them at any hearing.

We are **not** a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

We are **directly affected** by an effect of the subject matter of the submission that—

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

This submission has been sent to Palmerston North City Council by email to [submission@pncc.govt.nz](mailto:submission@pncc.govt.nz)

**Danielle Harris O.N.Z.M, LLB, PGDipBusAdmin**

**Chief Executive Officer**

## SO 16-5

### TE AO TUROA ENVIRONMENTAL CENTRE

Te Ao Turoa Environmental Centre (TATEC) contributes to upholding kaitiakitanga on behalf of Rangitāne o Manawatū iwi (Rangitāne). We promote the health and well-being of our people, the environment, wāhi tapu and taonga by forming positive relationships and partnerships with local councils, government agencies, private developers, and the wider community. The Environmental Centre undertakes ecological and cultural monitoring projects, restoration of waterways through planting, weed and pest control, and initiatives to reduce plastics in waterways. We engage in planning processes, including plan changes and resource consents.

We are part of Best Care (Whakapai Hauora) Charitable Trust, which includes a collective of health services run by our iwi. We deliver a Māori model of environmental management which we use to identify and measure resource management outcomes sought by Rangitāne o Manawatū. This model is Te Ara Whānau Ora (the Whānau Ora Pathways Framework). Whānau Ora was originally developed by our esteemed kaumātua Sir Mason Dury and Dame Tariana Turia, who applied it to our health-focused services.

### RANGITĀNE O MANAWATŪ, AND OUR CULTURAL AND CUSTOMARY CONNECTIONS AND ASSOCIATIONS WITH THE ROXBURGH CRESCENT AREA

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

Life centred around the awa, its tributaries, lakes and wetlands, which came to shape the worldview and values system of our iwi today.<sup>1,2</sup> Our worldview is based on the holistic principle that all elements are interconnected. Ecosystems within our environment rely on many elements, both physical and spiritual, at many scales, to function effectively. When one part of that system is interrupted, disturbed, or impacted,

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<sup>1</sup> McEwen, J.M. (1986). *Rangitāne: A tribal History*. Reed Books: Auckland.

<sup>2</sup> *Wai 182, Rangitāne o Manawatū*. Tanenuiarangi Manawatū Incorporated Office of Treaty Settlements.

## SO 16-6

Te Ao Māori becomes imbalanced, affecting its functionality, which in turn influences the health and well-being of that environment and us as people.

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

This mātauranga links us to the world, creating an inseparable bond and a responsibility to protect the environment from misuse. We have affirmed mana whenua over the area of Te Papaioea for hundreds of years, thus have a deep connection to the life-giving resources of the land and waters of the Manawatū area. Kaitiakitanga is the inherent obligation and responsibility we have as tangata whenua of this area, to nurture and protect, restore, and enhance the mauri of our environment for future generations.

Traditional entry to the Manawatū interior was gained by paddling and poling waka along the Manawatū Awa. At each major river bend, a permanent or seasonal village or pā existed within our history.<sup>3,4</sup> Life centred around the awa, its tributaries, lakes and wetlands, which came to shape the worldview and values system of our iwi today.<sup>5,6</sup>

The awa linked hapū (family groups) together to form Rangitāne o Manawatū, a collective of six different hapū. Hapū members work closely together and each hapū has a representative on the Rangitāne o Manawatū Settlement Trust. This collaboration forms one avenue of mandate for Rangitāne as an iwi authority.<sup>7,8</sup>

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<sup>3</sup> Taylor & Sutton (1999). *Inventory of Rangitāne Heritage sites in Palmerston North City, 1999*. Palmerston North City Council.

<sup>4</sup> Tanenuiarangi Manawatū Inc (1999). *Rangitāne Mahinga Kai Project*. Palmerston North.

<sup>5</sup> McEwen, J.M. (1986). *Rangitāne: A tribal History*. Reed Books: Auckland.

<sup>6</sup> Wai 182, Rangitāne o Manawatū. Tanenuiarangi Manawatū Incorporated Office of Treaty Settlements.

<sup>7</sup> *Treaty of Waitangi Claims: Wai 182 the Manawatū Claim*. Retrieved on June 1st, 2021 from <https://www.tmi.maori.nz/Treaty.aspx>

<sup>8</sup> *Rangitāne o Manawatū: Deed of Settlement documents (2021)*. Retrieved on June 1st, 2021 from <https://www.govt.nz/browse/history-culture-and-heritage/treaty-settlements/find-a-treaty-settlement/Rangitāne-o-Manawatū>

## SO 16-7

The statutory acknowledgements in the Rangitāne o Manawatu Claims Settlement Act 2016 require Council to provide Rangitāne o Manawatu with summaries of all resource consent applications that may affect the areas named in their acknowledgements, prior to decisions being made on those applications. The Manawatū River and its Tributaries area of interest (see Figure 1) encompasses the area subject to Plan Change E. The Rangitāne o Manawatū Statutory Area of Interest<sup>9</sup> is outlined in Figure 1 below. This cultural and customary connection encompasses 440,000 ha of the plains divided by the Manawatū River and its tributaries and includes the city of Te Papaoiea (Palmerston North).

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<sup>9</sup> *The statutory area of interest comprises the area bordered by: a) to the north-west, a line from the southern bank of the mouth of the Rangitikei River inland to the Orangipango Trig near Ohingaiti, b) to the north, a straight line from the Orangipango Trig near Ohingaiti to Te Hekenga, c) to the south-east, a line following the ridge/summit along the Ruahine and Tararua ranges across to the Taramea Trig, d) to the south-west, a line from Taramea Trig westward to the mouth of the Manawatū River, e) to the west, a line around the coast from the mouth of the Manawatū River northward to the mouth of the Rangitikei River.*

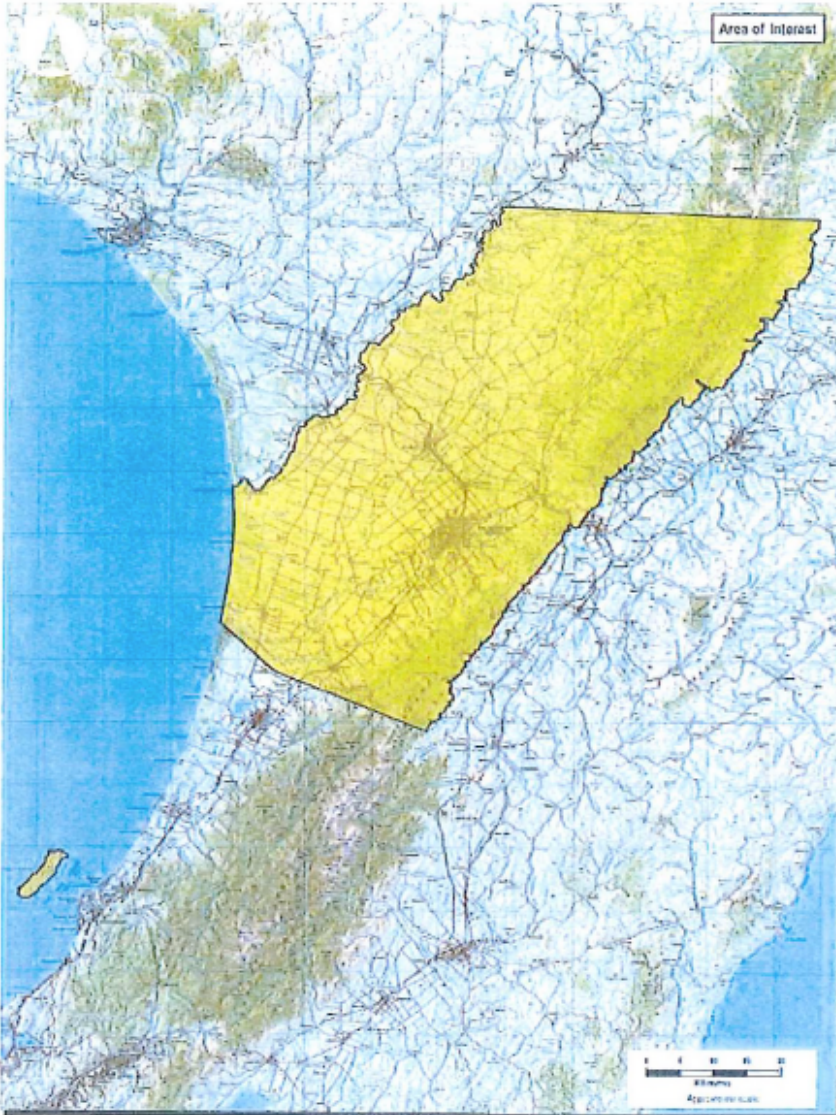


Figure 1: Rangitāne o Manawatū Area of Interest

Rangitāne have developed a statement to describe what Te Mana o te Wai means within the Manawatū Catchment Freshwater Management Unit, which includes the Manawatū Awa and its catchment, including its tributaries, groundwater, wetlands and lagoons:

*"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*



## SO 16-9

*connections, wetlands and lagoons are taonga and valued for the traditional abundance of mahinga kai and natural resources.”*

### **GENERAL POSITION:**

Te Ao Turoa Environmental Centre, on behalf of Rangitāne o Manawatū ('Rangitāne') is in general support of the Plan Change.

Brownfield re-development is an opportunity to improve the mauri of our whenua and wai. Rangitāne are broadly supportive of redeveloping this pocket of existing industrial activities for housing, as this provides opportunities to:

- remediate contaminated land,
- improve the amenity of nearby residential areas,
- improve the quality of stormwater entering the Manawatū awa, and
- provide housing opportunities in a location with good proximity to recreational and community amenities.

However, in providing these opportunities, the risks to the health and safety of the people who end up living there, and the taiao, must be safeguarded from contaminated land, impacts on resident's amenity from ongoing industrial uses, poor water quality, and flooding.

Historical injustices (as acknowledged in the Rangitāne o Manawatū Claims Act (2016)) have left our people with hardly any land in the city. Loss of access to our traditional resources and source of income has been amplified by inequities that Rangitāne (and Māori in general) experience with respect to access to housing, health, education and incarceration.

New housing, in places safe from natural hazards and using quality building standards that prioritise healthy homes, are essential to lifting Māori and Pacifica living standards. Through the Partnership Agreement and as Te Tiriti partners, the Palmerston North City Council (PNCC) have a responsibility to enable opportunities that reduce housing inequalities for Māori communities.

Population projections in the Palmerston North Housing and Business Development Capacity Assessment 2023 indicate that growth in Pasifika and Māori families (the Māori population is expected to increase by 3.6% by 2054) will result in an increase in multi-generational and larger households in the city (driven in part by the unaffordability of

## **SO 16-10**

housing). City wide, the Māori community is now the fastest growing community in Te Papaioea<sup>10</sup>, and is also very young.

### **RELIEF SOUGHT**

Plan Change E provides an opportunity to provide housing stock that responds to the needs of our smaller households/younger families. Rangitāne support and seek that the notified provisions are retained that enable the provision of affordable housing choices for smaller households, near to services and community facilities that promote healthy living, near public transport routes, accessible to our awa and community facilities, *provided that* such housing is safe from flood risk hazards and any risks from previously contaminated land. Please refer to our specific submissions on those matters.

Further, Rangitāne seek that PNCC adopt the proposed Plan Change E provisions and Structure Plan, subject to further amendments to address the potential noise, stormwater and natural hazards effects of adopting the proposed provisions, as further described in the specific relief sought below, and for the reasons we provide.

We seek the relief set out below, or any alternative relief that would have the same or similar effect; and any other consequential amendments required to the provisions to achieve clarity or consistency with the relief we have sought.

## **THE PROVISIONS OF THE PROPOSAL THAT OUR SUBMISSION RELATES TO ARE:**

### **IMPROVING THE MAURI OF OUR WHENUA AND WAI**

As stated above, Rangitāne have a statutory acknowledgement over the Manawatū awa within the Rangitāne o Manawatū Claims Settlement Act (2016). Water quality in the Manawatū Awa is poor and reduces our ability to interact with wai and undertake our cultural practices. This has an adverse impact on our cultural well-being. Plan Change E should include strong policy direction to ensure that re-development of this brownfield land purposefully improves the health of the Manawatū Awa, prevents any further deterioration and avoids any loss of values, in line with the policy direction in the NPS-FM 2020 and the RPS, in particular *Objective RMIA-O1 Resource Management*. This will

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<sup>10</sup> Palmerston North Housing and Business Development Capacity Assessment 2023. Amended version March 2024

## **SO 16-11**

enable Rangitāne to provide for our social, economic and cultural well-being, and provide opportunities to restore our connections with our ancestral lands, water and sites.

### **RELIEF SOUGHT**

Rangitāne seek that the proposed new objectives and policies in Section 10 and Section 7 for the Roxburgh Residential Area address the following:

- redevelopment of the Roxburgh Residential Area for housing assists to protect and restore the mauri of the Manawatū Awa, including through the capture and pre-treatment of stormwater on-site;
- when undertaking landscaping, indigenous species that would be expected to be present in that place are preferred.

### **MANAGEMENT OF STORMWATER**

Rangitāne are significantly concerned about stormwater and the sensitivity of the receiving environment, and how that will be managed through Plan Change E.

#### **NETWORK UPGRADES**

The Stormwater Servicing Assessment Report for Plan Change E ('Stormwater Servicing Assessment') identifies that the existing stormwater network is insufficient to service the existing industrial land use and is "undersized for the catchment in general<sup>11</sup>". Network upgrades will be required to ensure future residential development is serviced to the Council's required standards, along with significant restrictions on impervious areas.

The Stormwater Servicing Assessment states that the most significant infrastructure upgrade required is a replacement of the stormwater outlet pipe through the stopbank to the Manawatū Awa, which will require a resource consent from Horizons Regional Council (HRC). Further, that HRC has advised that it would only consider an upgrade to the outfall if it provided wider catchment benefit, beyond enabling development in the Roxburgh Crescent Residential Area. This will require upgrades to the pipe network within the catchment, and consequently, there will be a delay as funding is secured, necessary consents are obtained, and the upgrades are designed and constructed. Reflecting this, the Stormwater Servicing Assessment recommends that impervious area thresholds are set to reflect the timing of residential development, with a higher permeable surfaces requirement set for any residential development that occurs prior to the outlet and network upgrades (45% net site area, dropping to 30% after the outlet to the river is upgraded). The Stormwater Servicing Assessment also states that before

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<sup>11</sup> Appendix J: Stormwater Servicing Report, to the Section 32 RMA Evaluation Report, see pg 13

## **SO 16-12**

residential development could occur, the stormwater main on Roxburgh North will also need to be upgraded to at least DND300.

While the step change in impervious surfaces requirements is reflected in proposed Rule R10.6.1.8, it is not drafted as clearly or precisely as it could be. In addition, the rule does not reference the need for the DN255 stormwater main on Roxburgh North to be upgraded to at least DN300, as a precursor for any residential development. The Roxburgh North stormwater main upgrade should be identified in the rule as a precursor that is required to be installed before any residential development occurs within the plan change area.

Based on Figure 7 of the Stormwater Servicing Assessment, it appears that the upgrade to this stormwater main has been budgeted for in the Long Term Plan. However, the section of the document which discusses funding does not reference this 'stage 1' work and cross-references to Appendix C of the Assessment 'LTP Programme and cost estimate breakdown'. Appendix C has not been published with the notified plan change documents. Therefore, on the notified documents, it is not possible to determine whether this upgrade has been budgeted for and will be delivered, and the timing as to when it will be delivered.

### **RELIEF SOUGHT**

That the Council publish the Stormwater Servicing Assessment Appendices referred to in the notified documents.

That the Council confirm that the upgrade to the Roxburgh North stormwater main has allocated funding and will be delivered before residential development occurs in the plan change area. Alternatively, if residential development is likely to come forward in advance of this upgrade, Rangitāne seek that the proposed rules be amended. Rule R10.6.1.8 should be amended to specify that the upgrade must be in place prior to the construction of houses, and if not in place, construction of dwellings should become a non-complying activity under Rule R10.6.5.6.

### **MITIGATION MEASURES TO MANAGE CONTAMINANTS**

The Stormwater Servicing Assessment advises that due to the Roxburgh Residential Area being at the bottom of the catchment, specific stormwater management solutions will be required to be implemented. Some of those requirements do not appear to be reflected in the proposed provisions.

## SO 16-13

### RELIEF SOUGHT

The proposed provisions do not address the following 'minimum requirements' which are specified as being necessary<sup>12</sup> to address stormwater runoff:

- At subdivision stage (Section 7):
  - use of a high-flow bioretention/biofiltration device, using filtration media with a high filtration capacity - *the performance standard in R7.6.2.6(d) requires 'stormwater pits', but does not capture these details;*
  - recontouring of the Roxburgh Crescent area must not alter the existing overland flow paths or increase the catchment area discharging overland to Ruahine Street - *should be included in R7.6.2.6.*
  - the first 5mm of any rain event from the road carriageway and property driveways draining to the road to be treated prior to entering the piped network – *the performance standard in R7.6.2.6(d) requires 'treatment of road stormwater', but does not capture these details;*
  - requirement for an erosion and sediment control plan to be submitted, tailored to address the specific requirements necessary to prevent contaminants from contaminated land entering the stormwater network during (and after) preparatory earthworks – *Rule R7.6.2.6 should include a requirement that such a plan is prepared and incorporates any recommendations by a suitably qualified and experienced practitioner which are included in a preliminary site investigation or detailed site investigation, as referenced in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.*
  
- At construction of dwellings stage (Section 10, rules R10.6.1.8, R10.6.3.3):
  - roof leaders to be directly connected to the stormwater network,
  - rooves are to be zinc and heavy metal free.

Rangitāne seeks that the proposed rules in Section 10 and Section 7 are amended to include the minimum requirements identified above, as performance standards within the relevant rules.

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<sup>12</sup> See section 2.2.2, pg 15 and section 3.2 of the Stormwater Servicing Assessment.

## SO 16-14

### PERVIOUS PAVEMENTS

The Stormwater Servicing Assessment identifies that because of the relatively high pervious surfaces requirements, developers may want to consider the use of pervious pavements or similar technologies.

Rangitāne are concerned that such methods may be ineffective in achieving sufficient infiltration over the long term, and that such technologies can have a fairly high failure rate, and therefore a shorter life span than other types of stormwater mitigation.<sup>13</sup> Such systems are very susceptible to clogging from sediments, which then causes failure of the device. Key considerations when using such materials are:

- groundwater levels and geology/soils – seasonally high water tables can result in ponding;
- proximity of sediment/contaminant generating areas – such treatments should only be used in low use roads, parking areas or driveways;
- adjacent landscaping areas – which should be below grade/separated by barriers to prevent water containing sediment from washing into pervious paving;
- choice of species for planting plans – deciduous trees or trees with dense blossom should be avoided to prevent blockages<sup>14</sup>.

Rangitāne are concerned that the proposed provisions will rely on future home owners to maintain pervious paving in perpetuity, and rely on consent notices to enforce this.

It is likely that homeowners will install further hard surfaces within their properties over time and may fail to clear and maintain such surfaces, unless regular inspections enforce this. No amendments to the District Plan are proposed to address compliance monitoring of pervious paving within the plan change area.

Rangitāne are not convinced that Plan Change E is supported by sufficient evidence that the proposed impermeable surface limits will be effective in mitigating stormwater ponding/flooding within the catchment over the long term.

### RELIEF SOUGHT

If pervious pavements are to be relied on to achieve infiltration of stormwater, Rangitāne seek that the methods sub-section of Section 10 be amended to insert a method for the

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<sup>13</sup> Ira, S & Simcock, R. *Understanding Costs and Maintenance of WSUD in New Zealand. Activating WSUD for Healthy Resilient Communities*. July 2019, pg 26. Accessed at: <https://www.landcareresearch.co.nz/assets/Discover-Our-Research/Environment/Cities-settlements-communities/understanding-costs-and-maintenance-of-wsud-in-nz.pdf>

<sup>14</sup> *Ibid*, pg 61

## **SO 16-15**

PNCC to undertake regular inspections of pervious pavements within the plan change area, along with providing information and guidance to homeowners on how to maintain and repair such paving, and the importance of not increasing impermeable areas within their properties.

Alternatively greater levels of stormwater treatment should be required.

### **STORMWATER MANAGEMENT PLAN**

Rangitāne are concerned that despite the Stormwater Servicing Report directing that a Stormwater Management Plan is required to address treatment for stormwater runoff and pervious area requirements (see section 3.4) within the Plan Change area, this has not been included in the proposed provisions, specifically under proposed new subdivision rule R7.6.2.6. As currently drafted, rule R7.6.2.6 does not require a stormwater management plan or design to be prepared, despite the design of the road corridor being required to include water sensitive design elements and treatment of road stormwater (see performance standard d).

A Stormwater Design is required for multi-unit residential development under proposed Rule R10.6.3.3 vii Stormwater Design (this is an operative provision). Proposed new bullet point 5 addresses the permeable surfaces requirements; but does not address all the specified matters recommended to be included, including stormwater treatment prior to discharge to the primary network, as described in the Stormwater Servicing Report at section 3.4.

### **Relief Sought**

Rangitāne seek that the proposed provisions are amended to include a requirement for a Stormwater Design or Management Plan to be prepared, and for this to be inserted as a performance standard in Rule R7.6.2.6 and R10.6.3.3 vii.. Further, Rangitāne seek that the performance standard addresses all of the matters outlined in Section 3.4 of the Stormwater Servicing Assessment.

### **LACK OF PUBLIC OR LIMITED NOTIFICATION**

Rangitāne are not convinced that the proposed provisions are sufficiently certain or directive such that, following redevelopment for housing, effective stormwater management within the plan change area can be guaranteed.

Public or limited notification should not be expressly excluded (proposed Rules R7.6.2.7, R10.6.3.4) unless there is certainty that the provisions will ensure good

## **SO 16-16**

outcomes are achieved. Rangitāne's submission is that stormwater quality and quantity effects of re-zoning for residential development are not appropriately mitigated by the provisions as currently drafted, and therefore, there should be an opportunity for potential effects to be identified and addressed through notification processes. This should include consideration of the need to notify HRC and Rangitāne.

### **RELIEF SOUGHT**

If the proposed provisions to manage stormwater effects are retained as notified, Rangitāne seek that Rules R7.6.2.7 and R10.6.4.3 be amended so that limited notification is not precluded.

### **WELL-FUNCTIONING URBAN ENVIRONMENTS**

PC E should deliver an urban environment that enables our Māori communities to provide for their social, economic and cultural wellbeing, and for their health and safety, both now, and in the future.

Plan Change E should enable a variety of types of homes, that cater for our Māori communities and their needs, which are accessible, resilient, and which enable us to express our cultural traditions and norms. Those places should be resilient to climate change.

Policy 9 of the NPS-UD 2020 requires Council to involve Rangitāne in the preparation of Plan Change E. The Council must undertake effective consultation with us, and take into account our values and aspirations for urban development. If we wish to be involved in decision making on consents issued in response to the provisions of the plan change, the Council must provide opportunities for us to do so, where these consents have potential to impact on our sites of significance and issues of cultural significance.

### **RELIEF SOUGHT**

Rangitāne support the following provisions of the proposed plan change and features of the Roxburgh Crescent Structure Plan and seek that these are retained, subject to any amendments to improve their clarity and certainty:

- the requirement to provide a range of housing choices and densities (Section 7, Policy 11.6, Rule R7.6.2.6, performance standard (c) Lot size, Section 10 - Objective 16, Policy 16.2);
- the proposal to exchange Reserve land so that green space can be provided in the centre of the Roxburgh Residential Area, along with improved public access to the river (Objective 11, Policy 11.3, Structure Plan Map 7.10);



## **SO 16-17**

- re-purposing the Council owned piece of land at 22 Roxburgh Crescent so that it can be used as a road reserve to provide parking, to support public access to the river ((Objective 11, Policy 11.3, Structure Plan Map 7.10, Roadway cross sections);
- new road connections to ensure connectivity and avoiding the use of cul de sacs (Section 7, Objective 11, Policy 11.2);
- opportunities for multi-unit housing, and higher density along the stopbank and recreational areas, to enable more efficient use of land (Structure Plan Map 7.10, Section 10, R10.6.1.8, R10.6.3.3 – performance standards – Height Recession Plane).

### **MANAGEMENT OF FLOOD RISK**

The Council must take a precautionary approach (as directed by Regional Policy Statement *Policy HAZ-NH-P13 Climate Change*) when assessing the effects of climate change on the scale and frequency of natural hazards. This applies when making decisions about the nature of mitigation required to manage stormwater flows generated by the change in land use, and the types of activities which are enabled by Plan Change E, due to their proximity to the river.

The Plan Change E area is located adjacent to the Manawatū River stopbanks. The Stormwater Servicing Assessment refers to the findings of HRC special project review of the Lower Manawatū Flood Control Scheme (undertaken in 1993), which modelled the consequences of stopbank breaches resulting from potential types of failure. The Stormwater Servicing Assessment notes that the stopbank in proximity to the Roxburgh Crescent Residential Area is susceptible to undermining and foundation failures, and that there is a 15% probability of failure during a 1% AEP flood event (based on the 1993 stopbanks at Fitzroy Bend). Although the Stormwater Servicing Assessment indicates the probability of various failures occurring is now likely to be lower, due to improvements to the stopbanks since the 1993 study, no indication is provided of how much lower those probabilities may now be. In Rangitāne view, a 15% chance of failure over a period of 100 years is not insignificant. The Stormwater Servicing Assessment does not comment on how these risks might be exacerbated with climate change, with annual precipitation and expected rainfall intensity projected to increase in the Manawatū region.

Such an event may have low probability but high consequences and should be adequately planned for. Rangitāne are particularly concerned at HRC advice, which is captured in the Stormwater Servicing Agreement, that if very young or very old people were to be concentrated in the plan change area, the PNCC would be well advised to

## SO 16-18

take flooding issues from a stopbank breach into account when considering resource consents.

As the plan change directs smaller lot sizes and provides for the area to be developed for multi-unit housing, households with older people and small children are likely to end up living here. It may also be an area of relatively more affordable housing, with households who are less likely to have adequate insurance for hazard events.

Rangitāne acknowledge that the area subject to Plan Change E is within the part of the district protected by the Lower Manawatū River Control Scheme, where additional flood hazard mitigation or avoidance measures will generally not be required under Regional Policy Statement *HAZ-NH-P10 Development on land prone to flooding*.

The proposed provisions require raised floor levels (R10.6.1.8), but in Rangitāne view, the Rule should also adopt the policy direction in the RPS to require a safe access route between dwellings and an area where evacuation can be carried out, as per Policy *HAZ-NH-P10: Development on land prone to flooding*. Rangitāne consider such a precautionary approach should be adopted, notwithstanding that the policy signals no additional measures may be needed in areas protected by the Lower Manawatū Scheme.

### RELIEF SOUGHT

Rangitāne seek that R10.6.1.8 and R10.6.3.3 be amended to require an access route to a safe area for evacuation from dwellings, as described in clause 4b of *HAZ-NH-P10: Development on land prone to flooding*, because future dwellings constructed in the plan change area are likely to provide homes for older people and young families/children.

Rangitāne seek that any more than minor adverse effects on the effectiveness of existing flood hazard structures such as the existing stop banks, and overland stormwater flow paths be avoided. Rangitāne seek that the advice note to plan users regarding the stopbanks (at the end of Rule R10.6.1.8) is retained, and cross-referenced in any other relevant rules.

### OTHER NATURAL HAZARDS

Rangitāne support that a geotechnical investigation<sup>15</sup> has been undertaken to assess the potential for liquefaction risk within the plan change area. Rangitāne note that the site

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<sup>15</sup> Appendix I to Section 32 Evaluation Report, Liquefaction Assessment Report - 1-42 Roxburgh Crescent, Palmerston North, Prepared for Palmerston North City Council, by Tonkin & Taylor Ltd April 2020

## **SO 16-19**

has been classified as *Liquefaction Damage is Unlikely* and no lateral spreading hazard is expected to be present on site. For those reasons, the report authors advised that no additional measures to reduce liquefaction or lateral spreading risk are expected to be required for development of the site.

### **RELIEF SOUGHT**

No specific relief sought.

### **CONTAMINATED LAND**

Land within the plan change area is expected to qualify as 'priority contaminated land', as this is defined in *Policy HAZ-WC-P7 Identification of priority contaminated land\** in the Horizons One Plan Regional Policy Statement. A Preliminary Site Investigation (PSI) and a Detailed Site Investigation (DSI) has been prepared in general accordance with the requirements referred to in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES Soil'), and as outlined in the MfE Contaminated Land Management Guideline No. 1<sup>16</sup>.

The DSI has confirmed that a number of activities included in the MfE HAIL are currently, or have been historically, undertaken across the site. Soil sampling and testing at the site identified elevated concentrations of contaminants, although most results were below the specified thresholds for human health. The DSI identifies that the NES Soil and Asbestos Regulations will apply if residential redevelopment is undertaken and where contaminants are elevated above the human health guidelines, appropriate remediation will be required.

### **RELIEF SOUGHT**

Rangitāne seek that the proposed note to plan users under Rule R7.6.2.6 alerting them to the need to comply with the NES Soil is retained, along with the requirement for consent under those Regulations to be applied for before or concurrently with any subdivision consent.

### **IMPACTS ON RESIDENTIAL AMENITY FROM ON-GOING INDUSTRIAL USES**

Rangitāne considers it is not clear from the Plan Change E s32 Evaluation Report how adverse effects on new residents in the zone will be managed during the 'gradual

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<sup>16</sup> Ministry for the Environment, updated 2011. *Contaminated land management guidelines No. 1: Reporting on Contaminated Sites in New Zealand*.

## SO 16-20

transition' from current industrial activities to full residential development, which could occur over a ten year period, or more. Heavy vehicles will still continue to service the area while industrial activities remain in the area. The s32 Report seems to assume these issues will be resolved by re-zoning and applying residential noise standards, when in reality, there could be a considerable lag period during which new housing may be established in close proximity to existing industrial uses, which are likely to be exempt from complying with the residential noise limits, due to existing use rights. There does not appear to be any requirement in the proposed provisions to consider acoustic insulation in new dwellings to manage what could be a long period of incompatibility, despite this being the advice in the Accoustic Assessment Report<sup>17</sup>. The Accoustic Assessment identifies:

*"If the larger section of land is going to be developed on a piecemeal basis, alongside noisy construction machinery repairs or maintenance, then this will also need to be managed, preferably by providing substantial noise buffering and/or by noise insulating and ventilating new dwellings."*

Rangitāne consider there should at least be a policy directing consideration of this, and either performance standards or a matter for discretion that can be considered on a case by case basis, as the plan change area is developed.

### RELIEF SOUGHT

Rangitāne seek that:

- a new policy is inserted in Section 10 under proposed new objective 16, that addresses the need to manage the noise effects from existing and lawfully established industrial activities on new residential dwellings within the plan change area, for example through orientation of buildings, internal insulation and mechanical ventilation etc,
- a performance standard requiring assessment and consideration of the need for noise mitigation measures within new dwellings is inserted in Rule R10.6.1.8, and
- the noise effects from existing and lawfully established industrial activities is inserted as a matter of discretion in Rule R10.6.3.3(j).

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<sup>17</sup> Appendix H. Noise Assessment to the Section 32 Evaluation Report

## **SO 16-21**

### **URBAN DESIGN, PUBLIC SPACE AND BUILT FORM REFLECT OUR ASSOCIATIONS WITH WAI AND WHENUA**

As tangata whenua of this city, we wish to see the design of the built environment, including public and community spaces, reflect and celebrate the stories and identity of Rangitāne.

#### **RELIEF SOUGHT**

Rangitāne seek that opportunities to celebrate our cultural norms and traditions are expressed and acknowledged by promoting through the objectives and policies for the Roxburgh Residential Area in Section 7 (Objective 11 and related policies) and 10 (Objective 16 and related policies):

- street naming,
- locally sourced indigenous vegetation in planting schemes,
- design of the public open space; that reflects Rangitāne's associations and connections with this area, and its riverine environment.

Rangitāne seek that the proposed Structure Plan in Map 7.10, which respects the presence of the Manawatū Awa and seeks to make the most of its proximity, including improving public access, is retained as notified.

## SO - 17-1

### District Plan Change E - Roxburgh Crescent Residential Area

|  |  |
|--|--|
| Your contact details   |  |
| First name   | Rowan  |
| Last name  | Bell   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |  |
| Postal address   | 6a Ayr Place, Hokowhitu, Palmerston North 4410             |
| Email  | <a href="mailto:rowanbell@live.com">rowanbell@live.com</a> |
| Phone<br>Please provide a daytime contact number   | +64211344553   |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |

SO – 17-2

|   |  |
|---|--|
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>  | <p>Only allowing homes along the stop bank to be built up to 3 stories, while the rest will have a maximum height of 2 storeys to fit in with the surrounding area</p>   |
| <p>What's your attitude towards this specific part of Plan Change E?</p>  | <p>Amend</p>   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p> | <p>Remove the 3 storeys along the stop bank and make them 2 storeys</p>  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>  | <p>From the information provide in the Area Plan Change states that: Following previous community feedback and updated information on stormwater, new guidelines have been proposed to help make sure the new area fits in well with the surrounding neighbourhood. 3 storey housing overlooking the river walkway will be an eyesore and monopolise the landscape, losing its ambience and tranquillity, and therefore is contrary to the statement.<br/>The river walkway is for the benefit of all Palmerston North residence; families, dog walkers, cyclists all use this are for their enjoyment and relaxation, and by seeing 3 story houses looking down on them will spoil this enjoyment and detract from the purpose of the river walkway.<br/>The clause allowing homes along the river stop bank to be built up to 3 storeys be remove and replaces with 2 storeys.</p> |
| <p>You can attach documents in support of your submission point</p>   |  |

SO - 17-3





## SO - 18-1

### District Plan Change E - Roxburgh Crescent Residential Area

|  |   |
|--|---|
| Your contact details   |   |
| First name   | Doug  |
| Last name  | Kidd  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |   |
| Postal address   | 27 Tilbury Avenue, Palmerston North   |
| Email  | <a href="mailto:dkidd@rangitikeifloorings.com">dkidd@rangitikeifloorings.com</a>  |
| Phone<br>Please provide a daytime contact number   | +64275718905  |
| Trade competition  |   |
| Would you gain an advantage in trade competition through this submission?  | No  |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |   |
| Hearing  |   |
| Do you want to speak to Council in support of your submission?   | No  |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |   |
| Your submission  |   |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |   |
| State the specific part of Plan Change E that your submission point relates to.  | The building plans call for either 1 or 2 story building built on the boundary to Tilbury Avenue and three story buildings along the river frontage of the development. This has caused shading and |

**SO – 18-2**

|  |   |
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| <i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>  | privacy concerns amongst residents living on the properties adjacent to the Roxburgh Crescent   |
| What's your attitude towards this specific part of Plan Change E?  | Amend   |
| What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i>  | Support development to minimize shading concerns by restricting height and maximising building set back from property boundaries. Eliminating windows with a direct view of existing resident properties.   |
| Please tell us the reasons for your submission point.<br><i>For example, these height controls are set too low as they restrict development potential.</i>   | Many of the residents purchased the properties preceding the proposed development and have orientated their homes and lifestyles to face the Roxburgh Crescent development. Restricting the impact of the development would offset the disappointment of the loss of the reserve and the development of high density housing. |
| You can attach documents in support of your submission point   |   |
| Submission table - Submission point 2<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |   |
| State the specific part of Plan Change E that your submission point relates to.<br><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>   | The current development plan allows for three story, 11m, housing on the river front.   |
| What's your attitude towards this specific part of Plan Change E?  | Oppose  |
| What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i>  | Restrict the buildings to two story height.   |
| Please tell us the reasons for your submission point.<br><i>For example, these height controls are set too low as they restrict development potential.</i>   | The current river walk way is a high use area giving the impression of a semi rural park setting. Allowing buildings that can be seen from the foot paths will reduce the feel of the walkway.  |
| You can attach documents in support of your submission point   |   |
| Submission table - Submission point 3  |   |

## SO - 18-3

|  |   |
|--|---|
| <p>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.</p>   |   |
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>   | <p>During the city council hearings to rezone the Waterloo Reserve Councillor Dennison noted that the developer had raised concerns regarding the safety of pedestrians and cyclists if the reserve was retained.</p>                     |
| <p>What's your attitude towards this specific part of Plan Change E?</p>   | <p>Amend</p>  |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>  | <p>Clarify the councillor's and developer's concerns. The initial concerns were expressed without supported studies.</p>  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>   | <p>Ensure the safety of city residents and visitors.</p>  |
| <p>You can attach documents in support of your submission point</p>  |   |
| <p>Submission table - Submission point 4<br/>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.</p> |   |
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>   | <p>The Waterloo Reserve is included part of the development.</p>  |
| <p>What's your attitude towards this specific part of Plan Change E?</p>   | <p>Oppose</p>   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>  | <p>To retain the reserve it currently exists.</p>   |
| <p>Please tell us the reasons for your submission point.</p>   | <p>Residents bought their properties because the reserve is in place. A significant portion of local residents supported retaining the reserve as part of the neighbourhood identity. The new residents would also value the reserve.</p> |

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|   |  |
|---|--|
| <i>For example, these height controls are set too low as they restrict development potential.</i> |  |
| You can attach documents in support of your submission point                                      |  |

**SO 19-1**  
**District Plan Change E - Roxburgh Crescent Residential Area**

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**From:** Doug Kidd <dkidd@xtra.co.nz>  
**Sent:** Tuesday, 19 November 2024 1:29 pm  
**To:** Submission  
**Subject:** Submission on Plan Change E  
**Attachments:** RRA-RWtoPNCC1-fencing-30Oct24.pdf; RRA-RWtoPNCC2-trees-30Oct24.pdf; RRA-RWtoPNCC3-HRP+building-31Oct.pdf; RRA-RWtoPNCC4-safety-31Oct24.pdf; RRA-RWtoPNCC5-stormwater-6Nov24.pdf; RRA-RWtoPNCC6-contamination-12Nov24.pdf; RRA-PNCCtoRW1-12Nov24.pdf; RRA-PNCCtoRW2-14Nov24.pdf; RRA-2022PNCCschematic.pdf

From:  
Rosemary Watson  
27 Tilbury Avenue  
Hokowhitu  
Palmerston North 4410  
(06) 3585365

My submission consists of this e-mail, with 9 attachments.

These attachments include .pdf files of e-mail correspondence with PNCC planchange staff during the course of this public consultation, which largely represent my attempts to address some details of the public information released for the consultation, and investigate some seeming omissions from that information, to advise me further in preparation for my submission.

From that correspondence I understand that some of the points below are not covered by the current District Plan, and/or not presently covered by this proposed Plan Change.

However, even before the first round of public pre-consultation, the Council identified the Roxburgh Crescent area as a relatively unique opportunity to rezone a large brownfield site 'inside' an established residential housing area, and within PCE has itself proposed 'bespoke' changes to the District Plan, and other provisions, which recognise some of the specific issues of this development.

Thus I believe there is a precedent for also considering other issues which potentially could/should be included in PCE and/or the District Plan, and understand that the current submission and hearings process is the appropriate avenue for this.

Please note I am not opposed to residential development in the RRA *per se*.

Please note also that whilst I have had some factual information back from Council's planchange e-mail contact, in both initial and updated responses (attachments RRA-PNCCtoRW1... and RRA-PNCCtoRW2...), I find it frustrating that I also received several "unable to comment" responses therein, and also (unviable) suggestions to engage appropriate consultants/experts to clarify some of the possible discrepancies etc. in the Council's own material. As a result, I am including here some issues that could potentially have been suitably addressed earlier by Council and thus maybe omitted from consideration here.

I could not gain an advantage in trade competition through this submission.

I wish to be heard in support of my submission.

## SO 19-2

I will consider presenting a joint case with other submitters who make a similar submission at a hearing.

Submission points (please note I have chosen not to use the recommended submission table, but have tried to layout these points in a similar manner; also that I raised some of these issues previously during the 2 rounds of pre-consultation public engagement submissions in 2022 and 2023, which are on public record):

1)  
Inclusion of part of Waterloo Park Reserve in proposed RRA  
Oppose.  
Relief sought:  
Delete. Leave the Reserve where it is, for community use.  
Reasons:  
As per previous submissions/presentations (already on public record) re Reserve Exchange proposal. Significant local public interest in community use of land as future orchard/walkway. Preserve amenity values for Tilbury Avenue residents who deliberately chose location because of adjacent Reserve nature strip.

The following 3 points are directly related to point 1, since the proposed removal of the Reserve is being imposed on Tilbury Avenue residents.

2)  
HRPs on Tilbury Avenue boundary, consequent shading, overlooking and privacy issues (see attachment RRA-RWtoPNCC3... for details; I'd like to thank and acknowledge Jono Ferguson-Pye and Dave Charnley of PNCC for shade-modelling information provided)

Amend.

Relief sought:

1) Remedy of apparent discrepancy/ambiguity of details in proposed public documentation such that written description reflects HRP diagram more accurately in respect of compound angles at rear of diagram (District Plan R10.6.1.8g.i)b vs. exception b., in relation to Fig.1 HRP for the RRA); consider adding extra Figure for Tilbury/Ruahine boundary sections.  
2) Limit RRA zone buildings adjacent to Tilbury Avenue boundaries to single-storey, not 2-storey as currently proposed; and/or allow clerestory windows only on south-facing walls of those buildings; and/or increase lot sizes (widths) from minimum 250 sq.m. in that area; and/or coordinate design across the row of lots to avoid blocky 'terrace-like' construction.

Reasons:

1) Clarification for District Plan users  
2) Many of the reasons given in the relevant part of my earlier submissions and presentation during the pre-consultations and Reserve exchange process (already on public record) still apply here, although some were made at the time when a 3-storey limit was being proposed across the whole RRA. The performance standard re overlooking, Section 10.6.1.1(b) of the District Plan, is very brief in detail, but the accompanying explanation is worth including here:

*In dealing with the issue of the height of buildings in the Residential Zone, it is clear that there are a number of associated effects. Most of these effects impact on adjacent sites and dwellings and it is therefore important that any control, as far as possible, attempts to control these*

### SO 19-3

*effects without becoming unnecessarily complex or restrictive in terms of the design of any dwelling. The major effects which arise from the height of buildings are:*

- i. Effects on the penetration of sunlight and daylight to adjacent sites and buildings.*
- ii. Effects associated with overlooking which may lead to actual or perceived loss of privacy for outdoor areas or dwellings on adjacent sites.*
- iii. Effects arising from the physical bulk of the building which may lead to a feeling of loss of privacy due to the perception that the building on the adjacent site is oppressive.*

*While some of these effects can be dealt with by a recession plane approach, it is also necessary to control the location of windows to address the privacy issues. Equally it is also important that any recession plane is related to the orientation of the building in relation to the sun. For instance, a building close to a southern boundary is likely to have the greatest effect on neighbouring properties...*

The buildings on the RRA site are indeed likely to be as close to their southern boundaries as possible to maximise their own sunlight and amenity space to their north...

Re i) above, the degrees of shading at winter solstice as shown in the PNCC modelling data provided, assuming these to be the 'worst case scenarios' with correct interpretation, are not as extensive as predicted at 27 Tilbury Avenue, for either single- or 2-storey buildings using the HRP envelope given. There is also little real difference in the shading patterns for both options, until later in the day when there is more shading from the 2-storey model than from the lower option. Both options however indicate that most of the current main vegetable growing area, deliberately situated on the northern boundary of the property for maximum sunlight, will be under shade all day in midwinter. This is not the case with the adjoining Reserve *in situ*. The shading is a real issue, as the mature trees to the south of the current vegetable area in the section prevent any suitable relocation of the 'veggie patch' without huge deleterious changes to the garden design. The importance of vegetable growing here will only increase in future years, with retirement that brings less income and more time for gardening. Shading from RRA construction will not unduly affect the actual house at 27 Tilbury Avenue, but may well have more effect on the indoor living spaces of other properties along Tilbury Avenue where the dwellings are located closer to their northern boundaries with the proposed development.

Re ii) above, overlooking would definitely be an issue for several Tilbury Avenue properties especially if 2-storey buildings were permitted and had eye-level window(s) on the south of their upper levels. It would affect not only their outdoor amenity areas to their north, but also in some cases their inside living areas too. For indoor situations, privacy screening on the windows may offer a solution but could also limit the extent and quality of residents' outlooks into their own garden spaces. For outdoor spaces like decks and gardens, which are significant 'living' areas for some affected Tilbury Avenue residents, the main option for privacy would be suitable planting along their side of the common boundary fence, but that would create further shading... Visual overlooking would not be such a problem with single storey construction in the adjacent RRA, but the closeness to the boundary would lead to some loss of privacy from 'overhearing' instead.

Re iii) above, both single-storey and 2-storey options proposed would add oppressive physical mass to northern views from Tilbury Avenue properties, where there is currently open space or natural tree forms. With bulk as close as 1.5 m to the boundary, even the single-storey option would be intrusive, especially if narrow section widths are used in that part of the RRA, when the buildings would be placed very close to each other on their side boundaries.

An early PNCC schematic of the site layout (attachment RRA-2022PNCCschematic.pdf), from the 2022 round of pre-consultation, shows wider sections adjacent to Tilbury Avenue than the

## SO 19-4

current model, with only single storey buildings, the extra section width allowing for a variety of building footprints generally placed further from the rear boundaries with Tilbury Avenue properties. Obviously at that stage, planners recognised the disadvantageous effects, as above, of locating new dwellings close to northern boundaries of existing properties, and sought to ameliorate those effects. Although some aspects of the Structure Plan have been changed since that schematic was produced, a revitalisation of a similar single-storey-only layout along the RRA's southern boundary would go a long way to breaking up oppressive bulk, as well as minimising overlooking and further reducing shading. If there can be consideration for the RRA to have a bespoke rule in the District Plan to allow 3-storey along the river front, then can there not also be consideration of a similarly bespoke rule, for suitable single-storey only construction, on the northern boundaries of properties where considerable amenity loss has already been advanced by the proposed removal of the Waterloo Reserve nature strip?

3)

Fencing issues (see attachment RRA-RWtoPNCC1... for details)

Amend.

Relief sought:

Include in PCE suitable recompense agreements and/or fencing covenant clauses under Fencing Act 1978 and/or other appropriate legislation with respect to rear (northern) boundary fences of Tilbury Avenue properties, in favour of Tilbury Avenue property owners. To apply to adjoining land owners/occupiers from removal of Reserve status through land development changes up to and including first residential homeowners. Consider including similar in any future PCs where similar Reserve exchanges are proposed/included.

Reasons:

What is currently regarded as an 'adequate (existing) fence' between private and public land under the Fencing Act 1978 may not be regarded as an 'adequate fence' between private residential properties, especially in respect of (existing) gateways opening into future private properties. The proposed change of adjoining land use is being enforced upon Tilbury Avenue property owners out of their control, and as such they should not be expected to contribute to any work required to attain potential new 'adequate' shared boundary fencing standards.

4)

Trees (see attachment RRA-RWtoPNCC2... for details)

Amend

Relief sought:

A) Include in PCE suitable recompense agreements for Tilbury Avenue property owners with respect to falling/death of existing trees on their properties, due to unbalancing by trimming tops back to the boundary and/or root damage from RRA site work.

B) Include 'current value' assessments of existing trees and vegetation across the proposed RRA site, along with other infrastructure assessments. This should mean assessments not only of current traditional landscape amenity value, but also current value in terms of environmental regulation effects of shading, cooling, rainfall cushioning, water uptake, carbon uptake and storage; urban greening and human health etc. Expressing these benefits in monetary terms would help comparison with the environmental and other 'costs' of clearing the existing vegetation from the site and waiting years for replacement vegetation to achieve the same level of advantages. Include similar in future PCs.

Reasons:



## SO 19-5

A) The trees in question are not identified as 'notable trees', and therefore not protected under section 17 of the District Plan. However they are 'significant trees' in terms of the gardens they are in, as focal points, one as the dominant feature around which the rest of the garden was laid out. With the new RRA development, these trees will also provide some screening and privacy between existing and new dwellings, and will be almost the only remaining mature trees at the southern end of the site.

As for 3) above, this issue will only arise if the existing Reserve is removed and the land becomes privately owned, a situation out of Tilbury Avenue property owners' hands, consequently there should be no burden of remedy expenses on them.

B) A considerable number of mature trees are scheduled to be felled in preparation for this development, including a stand of gums and wattles in Waterloo Park Reserve which is home to a significant population of birdlife, notably ruru and tui. Also 'doomed' are a large number of poplars, and willows and gums, on public access land currently owned by Horizons; as well as the trees within the current industrial site boundary. The introduction to Section 10 (Residential) of the current District Plan states that the design of new housing development needs to limit adverse effects such as the removal of established vegetation. But where was the regard to this for the current Plan Change?

PNCC itself has recognised the Reserve trees as 'excellent specimens' (Report: Part Waterloo Park - Proposal to exchange land, Item15, Strategy and Finance Committee meeting 22 March 2023), and the stand meets several of the criteria for notable trees in Appendix 17F, Section 17 of the District Plan. Section 17 states "Any further addition or deletion of a tree from the Schedule [*of notable trees*] will only be considered where a request for a Plan Change has been received." It seems there has been no such consideration for this proposed Plan Change.

The plan documents do mention new planting, street trees, trees on the relocated reserve and vegetation on individual lots etc., but there seems to have been no evaluation of the benefits of this, except in general terms of stormwater management, and especially in relation to the existing vegetation. Is this good enough? Palmerston North's 4th goal in its City Vision is that of an eco city, and as such it recognises the need "to respond to climate change and be a more environmentally sustainable city". Also in PNCC's eco city strategy "For the city to be successful and sustainable, Council must lead the way in sustainability... We will develop a culture of sustainability within our organisation. We will improve our own practices..." So, in this Resource Management Act process, please recognise and value existing vegetation as an eco-friendly sustainable resource and manage it accordingly...

(Is it just coincidence that as I am writing this, RNZ National (Saturday Morning 16/11/2024) is playing an interview called 'Nature makes us healthier' with Kathy Willis, Oxford University Professor of Biodiversity, about the positive physiological and psychological effects on humans of bringing greenery/nature into cities?)

5)

### Riverfront building height limits

Amend.

Relief sought:

Do not allow 3-storey buildings, 11 m max. height. Limit to 2-storey buildings, 9 m max. height.

Amend proposed new parts of Chapter 10 Residential of the District Plan accordingly, amend other relevant parts of PCE accordingly.

Reasons:

## SO 19-6

Three-storey buildings, as per various PNCC 'artist's impression' representations during the public engagement, including in the current Facebook post on rezoning Roxburgh Crescent, will dominate and overwhelm the part of the River Park they overlook. River Park users the other side of the stopbank from the development will lose the perception of urban wilderness, of being in the countryside whilst still in town, due to the towering bulk of a row of closely spaced 3-storey buildings: especially if the Structure Plan does incorporate, as seems likely, Higgins' proposed purchase of Horizons land to the east of the Roxburgh Crescent site, which will bring the RRA and the buildings on it closer to the stopbank than the current industrial zoned area would allow. The Section 32 Evaluation Report (p.22) says "The pocket of industrial activity at Roxburgh Crescent detracts from the... amenity value of the river corridor." and (p.31) "While the intent of PCE is to enable three storey development within the Riverfront Area... this is not considered to impact on the natural character of the Manawatū River." I posit that most regular users of the River Park in that area would agree that the bulk of a row of tall narrow box-like buildings 'standing over' the area would detract, more than the current industrial zone does, and impact more on the natural character of the open space. Again, from the Report (p.132), "the utilitarian scene [*of the current industrial area, viewed from the stopbank*] contrasts jarringly with the expansive green landscape of the river corridor". How does the proposed residential building bulk not also do this? The renderings provided suggest that it will stand out like a 'concrete pimple' towering over the adjacent greenspace. Three-storey buildings are not needed to "help define the edge of a large open space" (p.50), as the stopbank itself does that perfectly well, especially when viewed from further downhill nearer the river itself: and are not used anywhere else along the entire River Park for that purpose. The District Plan specifically limits building heights in Aokautere on the ridge above the Turitea Valley because of their visual intrusiveness on the 'skyline' when viewed from below, yet the 3-storey buildings proposed for the river front will do just that above the 'ridge' that is the stopbank...

Some of the justification for 3-storey buildings relates to views over the River Park area, and a sense of custodianship over that land by riverfront homeowners. The stopbank height as given in the Report (p.433) is only 2.5 m, so surely 2-storey buildings (max. 9 m) will still allow those benefits for those in the riverfront dwellings, whilst also providing the desired 'passive surveillance' over park use/users (versus far more 'aggressive overlooking' from dominating 3-storey structures). Again, current River Park users would recognise the validity of this from the level of the windows of the 2-storey buildings already in the area relative to the stopbank.

- 6)  
Stormwater planning provisions (see attachment RRA-RWtoPNCC5... for details)  
Amend (if necessary)  
Relief sought:  
Council to investigate, and resolve if necessary, apparent discrepancies in Section 32 Evaluation Report, between their own summary of the Stormwater Assessment consultant report, and the consultant report itself, re pervious/impervious, permeable/impermeable terminology in relation to site surfaces, and basic assumptions of the initial extents of these used in modelling.  
Reasons:  
Need to clarify, and correct facts and assumptions if necessary, to ensure modelling of changes of overall site pervious % with development is correct, and the timing of "peak site impermeability" during development is adequately matched by stormwater installations/upgrades: the desired outcome obviously to minimise risk of surface flooding on site and adverse run-off effects on neighbouring properties during storm events etc.

## SO 19-7

7)

Ruahine Street pedestrian/cyclist accessway safety (see attachment RRA-RWtoPNCC4... for details)

Amend (if necessary)

Relief sought:

PNCC as overall manager of Plan Change to investigate the 'not safe' claim made by their major Plan Change development partner in the time between the draft and final Transport Assessment reports, neither of which identify any such issue. Council to ascertain the nature of the safety issue, and whether it was successfully mitigated before the final report, or amend details in relevant literature to include the issue and proposed action(s) to remedy the issue.

Reasons:

Primarily, to ensure safety for pedestrians and cyclists using the accessway(s) between the RRA and Roxburgh Crescent. Also, the above claim was included in a PNCC Notice of Motion (Waterloo Park Land Exchange) at an open PNCC Council meeting, around 5 years into the development of the rezoning proposal. It surely behooves PNCC to investigate how a safety issue might have been overlooked thus far, not only to improve the efficiency of Council processes and the overall outcome of the Plan Change, but also to absolve the Council if future incidents do arise from not addressing that issue.

8)

Contamination issues (see attachment RRA-RWtoPNCC6... for details)

Amend

Relief sought:

A) Include existing near-neighbours and users of the River Park near the RRA as receptors of dust and dust/wind-borne heavy metal and asbestos contaminant pathways (inhalation/skin contact/ingestion) in the conceptual site model, and implement contamination management strategies accordingly.

B) PNCC and/or Horizons, as local administering authorities, to implement site-wide overseeing of contamination-related issues throughout entire RRA construction period.

Reasons:

A) Site neighbours and adjacent public areas are apparently not currently considered in either Contamination Report. This is a serious omission, surely, in our windy city; with the physical extent of site contamination recognised to date and the consequent soil removal work necessary; with the stated need for further testing and thus possible further soil contamination being identified; and with the amount of planned demolition of buildings likely to contain asbestos. In particular, residents of Tilbury Avenue properties downwind of the prevailing north-west winds travelling across the RRA site include young children, asthmatics and food gardeners.

B) Despite the requirements already in place via the relevant environmental standards and consent processes, and the proposed new rules in Section R7.6.2.6 of the District Plan, the unusual nature of this industrial area in terms of size, previous usage and location adjacent to an existing residential zone, warrants site-wide overview/organisation to ensure overall co-ordination of contamination management activities. The degree and specific locations of the recommended additional intrusive testing need to be matched carefully to future lot layout (NES "piece of land") as well as past HAIL activities (NES "more likely than not") to ensure safety for workers and eventual residents on each section. Also, there may well be different developers

## SO 19-8

working within the RRA at the same time, so there should be higher level scrutiny to ensure overall site compliance with regard to the NES Soil legislation limits for contaminated soil disturbance, soil disposal and site restoration.

9)

### Noise control

Amend (if necessary)

Relief sought:

Specific inclusion in PCE, and enforcement, of RRA-wide set working hours for site development/building activities that generate significant noise, such as demolition, earthmoving, pile-driving, construction framing etc. As per NZS 6803:1999 Acoustics - Construction noise, as per District Plan, or other appropriate standard.

Reasons:

The noise assessment recommends that Residential Zone noise provisions are applied to the RRA at the outset of the rezoning, but this appears to be weighted towards managing reverse sensitivity of new residential living among existing industry operation as development proceeds. Where construction is mentioned, noise buffering and noise insulation are offered as preferable solutions, along with limited heavy vehicle movement at night, seemingly in relation to new dwellings on site. There appears to be no direct consideration of construction-related noise relief for the existing residential neighbourhood over the proposed long time frame of ongoing site development.

Thank you for reading and considering this submission.

PNCC 2022 consultation - website schematic of RRA  
(original in colour).

Here, white roof = single storey, light grey roof = 2-storey  
dark grey roof = 3-storey.



shows single storey along boundary, but  
PNCC planners say 11m possible over entire site;

## SO 19-10

**Subject:** Roxburgh Residential Area  
**From:** "Eamon Guthrie" <[eamon.guthrie@pncc.govt.nz](mailto:eamon.guthrie@pncc.govt.nz)>  
**Sent:** 12/11/2024 8:35:46 AM  
**To:** "[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>

Hi Rosemary,

Thanks for your queries regarding Roxburgh Crescent. Please find Council's responses to the issues/questions raised in your emails sent to us.

In regards to the issues raised email dated 30 October sent at 4.39pm,

- Questions 1 – 4 Fencing along adjoining private boundaries is considered to be a private matter between landowners and is not to be regulated as part of the Plan Change. Fencing is regulated under the Fencing Act 1978 and council is unable to comment further as part of the plan change.

In regards to the issues raised email dated 30 October sent at 9.35pm,

- Question 1 - Unless trees have been identified as a notable tree under the district plan, persons can prune trees if they overhang their property. Further information can be found here: <https://www.pncc.govt.nz/Services/Tree-maintenance#section-3>
- Question 2 - Council is unable to comment as to whether these trees you have identified are of significance or not at this stage. You may wish to include this as part of a submission.

In regards to the issues raised email dated 31 October sent at 5.02pm,

- I have spoken to Jono Ferguson-Pye and one of our council officer's is preparing a set of diagrams to help you understand the dwelling standards under Section 10 of the District Plan. I'm hopeful I'll receive a response by the end of the week. However if you want a quicker response, I would recommend engaging a consultant to provide commentary to your questions or include this as part of your submission.

In regards to the issues raised email dated 31 October sent at 9.59pm,

- Council is unable to comment as to the position of the private landowner that is outlined, as their views may or may not be different. You may wish to include this as part of your submission or talk to them directly.

In regards to the issues raised email dated 6 November sent at 11.22pm,

- Council is unable to provide a response to these questions raised. I suggest engaging a consultant to provide commentary to your questions or include this as part of your submission.

Kind regards,  
Eamon



**Eamon Guthrie**  
Senior Planner

Palmerston North City Council  
Te Marae o Hine – 32 The Square  
Private Bag 11034, Palmerston North 4442

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## SO 19-11

**Subject:** Roxburgh Residential Area  
**From:** "Eamon Guthrie" <[eamon.guthrie@pncc.govt.nz](mailto:eamon.guthrie@pncc.govt.nz)>  
**Sent:** 14/11/2024 9:07:19 AM  
**To:** "[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>

Hi Rosemary,

Thanks for your queries regarding Roxburgh Crescent. Please find Council's updated responses to the issues/questions raised in your emails sent to us.

There are some questions that relate to matters outside what the District Plan covers. I have noted those matters below for you. Now that we are in a formal submission process any changes to the provisions in the District Plan can only be made through the hearing process with the decision being made by the independent hearings panel. The planners role is to make recommendations on submissions – which is a narrow role. Many of the emails you have sent through to Council should really form parts of your submission to maintain the integrity of the plan change process. We welcome you to make a submission of all points where you have asked Council a question as it relates to proposed provisions.

In regards to the issues raised email dated 30 October sent at 4.39pm,

- Questions 1 – 4 Fencing along adjoining private boundaries is considered to be a private matter between landowners and is not covered by the Plan Change. Fencing is regulated under the Fencing Act 1978 and will be between landowners. The proposed provisions for the Roxburgh Area in relation to fencing is only where the fence adjoins a public space or road frontage, there are no requirements proposed for rear boundaries as you reference in your email.

In regards to the issues raised email dated 30 October sent at 9.35pm,

- Question 1 - Unless trees have been identified as a notable tree under the district plan, persons can prune trees if they overhang their property. Further information can be found here: <https://www.pncc.govt.nz/Services/Tree-maintenance#section-3> The plan change does not require any trees to be removed. This will be up to each landowner if it is something they chose to do.
- Question 2 - Council is unable to comment as to whether these trees you have identified are of significance or not at this stage. We understand from discussions previously with Aaron Phillips that the open space area in the centre of the area will include planting of trees when money is allocated in the LTP and likely after surrounding development that borders the park has been completed to avoid damage to any plants.

In regards to the issues raised email dated 31 October sent at 5.02pm,

- I have spoken to Jono Ferguson-Pye and one of our council officer's is preparing a set of diagrams to help you understand the dwelling standards under Section 10 of the District Plan. Given the specifics of the questions you may wish to engage a planning consultant to assist you.

In regards to the issues raised email dated 31 October sent at 9.59pm,

- Council is unable to comment as to the position of the private landowner that you have outlined in your email. You may wish to talk to them directly.

In regards to the issues raised email dated 6 November sent at 11.22pm,

- As the proposal is to change the zoning of the site we do not know how or where the landowners will start development, nor when they will commence. This is outside the control of the Council and the role of the District Plan. In terms of the stormwater matters raised, we suggest that you include these matters in your submission or seek your own expert advice.

In regards to the issues raised email dated 12 November sent at 11.10pm,

- Matters related to contamination are managed under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health. The landowner is responsible for ensuring compliance with that standard and we expect them to engage a technical expert to assist in the necessary consents. The level of detail you are seeking here is beyond the matters to be considered by the District Plan.

Kind regards,  
Eamon



**Eamon Guthrie**  
Senior Planner

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## SO 19-12

**Subject:** Roxburgh Residential Area - fencing  
**From:** "Doug Kidd" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>  
**Sent:** 30/10/2024 4:39:10 PM  
**To:** [planchange@pncc.govt.nz](mailto:planchange@pncc.govt.nz)

Hi Plan Change people,

This enquiry is specifically in relation to the southern end of the RRA area bounding properties on Tilbury Avenue, though I guess some it it could also apply in general to other boundaries between the proposed new development and existing residential homes.

The northern boundaries of several Tilbury Avenue properties currently adjoin part of Waterloo Park reserve, which is Crown public access land administered by PNCC.

The Tilbury Avenue properties have different styles and heights of fencing adjacent to the current reserve, and some have gates giving direct access to the reserve.

Under the proposed RRA plan change, this reserve is to be taken away, and the northern Tilbury Avenue boundaries will become southern (rear) boundaries of private residential lots in the new development.

I cannot find specific information relating to the above scenario in either the District Plan or the Section 32 report for the RRA development ie no indication of specs for back boundaries in the new development.

My questions are:

1) Presumably, as a minimum, the developers will require gates to be removed from current fences which will form the back boundaries of new lots.

Who is responsible for paying for these modifications of existing Tilbury Avenue fences when such modifications are necessary due to the reserve removal enforced on the Tilbury Avenue residents by the Plan Change agenda?

Surely the developers and/or PNCC should bear this cost, and not the Tilbury Avenue residents affected?

2) What are the general rules for retention or otherwise of the existing Tilbury Avenue boundary fences in the initial development of lots adjacent to these fences?

3) Re 2) above, in particular, what is the situation where the back of a single lot in the new development spans the boundary between 2 adjacent Tilbury Avenue properties with different fencing styles/heights? Would the developer leave as is, or require change?

4) With 10 m proposed/possible lot widths in the RRA site along the Tilbury Avenue boundary, it is possible that several of those lots could border one Tilbury Avenue property. What protections are there in the Plan, either for initial development or later renovations by adjacent RRA homeowners, to ensure that Tilbury Avenue homeowners with currently a single style northern fenceline are not 'forced' into potentially having a 'hotch-potch' of several lengths of fence of different styles/heights?

Any other insights you could provide on this fencing issue would be welcomed.



## **SO 19-13**

Thanks in anticipation of your reply.  
Rosemary Watson

NB I'm going to be asking a few questions on other aspects of the development, and I've decided for clarity and ease on both sides to try to keep these different aspects on separate e-mails. So please be prepared for further e-mails from me in the near future, cheers.

## SO 11-14

**Subject:** Roxburgh Residential Area development - trees  
**From:** "Doug Kidd" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>  
**Sent:** 30/10/2024 9:34:55 PM  
**To:** "Plan Change" <[planchange@pncc.govt.nz](mailto:planchange@pncc.govt.nz)>

Hello Plan change people,

I have a large specimen ash tree close to the northern boundary of my property (27 Tilbury Avenue) with the part of Waterloo Reserve which will be taken away if the RRA Plan Change rezoning goes ahead.

The neighbouring house has a smaller, but still significantly-sized, cherry tree even closer to its northern boundary with the same piece of reserve.

Both trees have top growth and likely also roots crossing over/under the property boundaries into the existing reserve.

These two trees will be almost the only mature trees near the south of the RRA if the development goes ahead and all the trees in the existing reserve, the Roxburgh site and the eastern extension of the Roxburgh site into Horizons land are felled during site clearing.

1) I foresee a scenario where the RRA site developer cuts the branches of the two trees back to the fenceline, and possibly also causes root damage/removal through excavations for new fencelines or house foundations etc.

These actions could weaken and unbalance the trees, which could possibly lead to their deaths and/or their falling, most likely into Tilbury Avenue properties due to the lack of balance and the prevailing wind direction.

What rules pertain in this case to mitigate/remedy such situations, where the reasons for the potential tree damage/death/falling are seemingly out of the control of the tree owners?

2) I have read the Section 32 evaluation report for the site, and see no specific assessment of the amount of tree vegetation on the RRA site currently (all of which are due to be felled if the rezoning proceeds), versus the extent of tree vegetation planned for the developed site.

Was any such assessment done less formally, to put any sort of value, monetary, environmental or otherwise, on the various benefits of the existing mature greenery, compared to future plantings and their time to reach maturity and the same level of value as current plantings?

If not, then with respect, why not, if Palmerston North is to truly embrace its eco-city aspirations? (I understand from Dave Charnley, PNCC senior urban designer, that there is a tool (i-Tree Eco) which assists with such evaluation and has been trialled in New Zealand).

What plans does PNCC have for the use of such technology in the eco-assessment of future major site developments please?

Thanks in anticipation of your reply.

Rosemary Watson

## SO 19-15

**Subject:** Roxburgh Residential Area development - height recession planes and building placement on lots  
**From:** "Doug Kidd" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>  
**Sent:** 31/10/2024 5:02:23 PM  
**To:** "Plan Change" <[planchange@pncc.govt.nz](mailto:planchange@pncc.govt.nz)>

Hello Plan Change people,

I'm trying to get a real feel for how much sunlight (and shading) the homes along the north side of Tilbury Avenue will get, if buildings of up to 2 storeys (9m) are placed in the proposed development along what is currently the 'buffer strip' part of Waterloo Reserve.

I have read the proposed changes to Chapter 10 Residential of the District Plan on pages 92-109 of the Section 32 evaluation report.

I note Figure 1 HRP for the RRA (except River Front Area) on page 96, and assume from the proposed Structure Plan that the lots adjacent to Tilbury Avenue might approximate to the Standard Lot layout shown there, with their side boundaries running north-south and with their rears to the south backing on to Tilbury Avenue.

Is this a reasonable assumption please? (If not, please could you advise re the most likely layout scenario for the southern end of the site, and adapt your answers to my queries below accordingly?)

I note further that a seemingly identical Figure, except with additional dimensioning along its left side, was included in the 2023 public consultation information. This 2023 Figure is noted as for 40% (site) Coverage, but on p.93 of the current report the maximum site coverage is noted as 45%.

Could you please provide an HRP diagram, assuming 45% site coverage, not 40%, as per above, and an explanation for the specific situation for lots backing on to Tilbury Avenue and Ruahine Street, as I am confused by section g. on p. 94 of the report? (The Guidance Note on how height recession planes are measured is missing from p. 95 of the report.)

In particular, I'm not sure about the expression "45 degree angle inclined inwards at right angles" in relation to the rear of the Figure shown, though I can understand it in reference to the front (street end) of the Figure, where the red dotted lines angle inwards (at 45 degrees) away from the long sides but remain perpendicular to the front boundary. At the rear it would appear that there are two angles involved above the 2.8 m level (north-south and east-west, compounding...) Please clarify, thanks.

Could you please also specify if possible the minimum distances from the rear boundary that would apply to a single storey, and a double storey, building at 45% site coverage using this HRP diagram. (I see the potential for homes on sites adjacent to Tilbury Avenue to be set as far south on their sections as possible, in order to maximize sunlight on their own properties).

Lastly, please could you provide some form of dimensioned diagram(s) using RRA latitude data and the above 'minimum distance from rear boundary, maximum site coverage' scenario, to indicate the maximum daily extent of shading to the south that would occur for both two-storey, and single storey, buildings on Tilbury-adjacent sites, firstly at the winter solstice when the sun is lowest, and also at the equinoxes.

## **SO 19-16**

Thanks very much in advance of your reply.

Rosemary Watson

## SO 19-17

**Subject:** Roxburgh Residential Area - cyclist/pedestrian access safety issue  
**From:** "Doug Kidd" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>  
**Sent:** 31/10/2024 9:58:45 PM  
**To:** "Plan Change" <[planchange@pncc.govt.nz](mailto:planchange@pncc.govt.nz)>

Hello Plan Change people,

I have read the Roxburgh Crescent Plan Change Transport Assessment part of the Section 32 evaluation report re the proposed rezoning of the Roxburgh Crescent area.

I note the original draft of this Assessment was made in 8/2022, with specific updates in 3/2024.

The 2 vehicle crossings from the RRA to Ruahine Street are discussed in section 4.3.2 of the Assessment, pp. 177 -179.

There appear to be no major safety issues identified at either crossing in that discussion.

In the Notice of Motion presented to Council on 18 Dec 2023, it was stated that:

"... there is an indication that the major landowner may now oppose both pedestrian and cycle links via the planning process on the grounds that they are not safe or necessary..."

What was/is the safety issue identified by the landowner that was/is not apparently identified in the Transport Assessment (or mentioned anywhere else in the Section 32 report as far as I can see)?  
And what has been done/will be done to mitigate that issue please?

Thanks in anticipation of your reply,  
Rosemary Watson

## SO 19-18

**Subject:** Roxburgh residential area - stormwater  
**From:** "Doug Kidd" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>  
**Sent:** 6/11/2024 11:21:49 PM  
**To:** "Plan Change" <[planchange@pncc.govt.nz](mailto:planchange@pncc.govt.nz)>

Hi Plan Change People,

I'm a bit confused about the stormwater information given in the Section 32 report and attached Appendix J Stormwater Assessment, which I have read and make no pretence of understanding all of!

However, there appears to me to be some discrepancy as below:

In part 5.3.1, (p. 23-24) the Stormwater Assessment is mentioned thus:

"The Report notes that the **site is generally pervious** which will change as residential development occurs and **becomes more impermeable**. An **increase in stormwater flows is likely to occur** from the site changing to residential use."

"Specifically, an upgrade to the stormwater outlet pipe is identified in the Report. The Report identifies that this upgrade is necessary because of **increased flows** being generated from the site. Until the outfall is upgraded, higher permeability standards are enforced through the District Plan provisions, with allowance for this standard to drop once the outfall is upgraded.

The Stormwater Assessment says, variously:

"...given the **existing land use is currently considered 100% impervious...**" (p.442)

"Given that the existing land use in the PC area is industrial, the change to residential land use is not considered likely to result in any increase in the risk of flooding within the site or upstream as it is anticipated that the **percentage of impervious area will decrease with residential lot development** ." (p.446)

"Because the existing land use is industrial and **most of the site is already impervious** , the predicted change in runoff volumes, flows and contaminant discharges associated with conversion to residential land use is considered to be negligible with the possibility of a slight improvement." (p.450)

The above 2 (my italics) seem to be somewhat opposite in meaning to me. Please clarify my understanding here.

Also, the '100% impervious' statement re the current site seems incorrect. The site includes a considerable area in the south which was originally the Regional Council willow/poplar tree nursery (which had a soil /grass surface), more recently used by Higgins for parking/storage/dumping, and covered by them with coarse stones/gravel, which is surely a fairly permeable surface? Plus the PC site contains the Waterloo Park reserve buffer strip, which has grass and vegetation cover, and the grassed land near the stopbank (to be) acquired from Horizons. And there are also various other gravel or similar yards currently on site further north. So, not 100% impervious I believe. Though I'm not going to estimate any actual percentages (not my pay grade!).

What, if any, implications might this have on the modelling for stage 1 and stage 2? For instance, if it's considered 100% impervious now, then how does a change to a minimum of 28.4% pervious equate to more stormwater flow?

## SO 19-19

One further thing does seem pertinent.

Figure 12 in the Urban Design Report (p.125) shows the majority Higgins ownership in the southern end of the site. Is it reasonable to assume that development of the site will start in Higgins property? Assuming so, then it may also be reasonable to assume that some of the first works will be the extension and link roads south, and residential buildings accessed from these roads, at the south end of the site. Initial construction on currently permeable land will result in a considerable initial net overall decrease in permeability/increase in impermeability for the site, compared to the status quo. The overall level of impermeability will then decrease in later stages, as areas further north in the RRA, currently under concrete, are cleared and developed with minimum permeable surface requirements. Has the modelling and associated timeframes for phased site development and the stormwater upgrade accounted for this 'peak impermeability'?

Hoping you can explain all this for me to allay concerns of stormwater run-off affecting near neighbours.

Thanks in anticipation.

I also look forward to receiving written replies to my previous e-mails, sent last week.

Regards,

Rosemary Watson

N.B. Page numbers mentioned here are from the copy of the Section 32 report on your website, which don't align completely with those in the hardcopy you kindly provided.

## SO 19-20

**Subject:** Roxburgh Residential Area development - contamination issues  
**From:** "Doug Kidd" <[dkidd@xtra.co.nz](mailto:dkidd@xtra.co.nz)>  
**Sent:** 12/11/2024 11:10:09 PM  
**To:** "Plan Change" <[planchange@pncc.govt.nz](mailto:planchange@pncc.govt.nz)>

Hello again Plan Change people,

I have read the relevant parts of the Section 32 Evaluation Report, including the contamination reports (Appendices F and G).

I understand that the data provided in those reports is deemed sufficient for the Plan Change process, and it is intended that contamination issues are to be dealt with through resource consents under the NESCS and Asbestos Regulations at the time of site development.

The conceptual site model provided in Table 3 of Appendix F omits near neighbours as possible receptors of dust-borne contaminant pathways.

So, mostly on behalf of those neighbours, especially those of us in Tilbury Avenue who are downwind of the site's prevailing wind direction, I'd appreciate some further insights into future consent and development processes please, as below, and especially in relation to asbestos and heavy metals, even though those consents are not part of the Plan Change.

1) Further intrusive testing for contaminants to be done once industrial activities have ceased and prior to residential development (and I'm assuming this further testing has not yet been done...) "Based on the results of testing, remediation of soil is required as part of any future development of the site, and this will be site specific." (p.37) "Landowners or developers looking to develop housing will be responsible for their own remedial work, if required."(p.40)

The DSI contamination report (Appendix F, dated 3/2020) notes areas on the site for further investigation (Fig F2).

How will specific test points be chosen within those areas?

And by what party?

How many test points will be chosen? e.g. one per proposed lot, or...

Will there be any consideration of possible changes to use etc. since the report was prepared? For instance, the recent large pile of bitumen waste shown in the photo in the report frontispiece, though mentioned in the DSI report, is not shown in Fig F2, and at least part of it would appear to be outside the 'ongoing HAIL activities' area indicated on that Figure.

2) Soil disturbance issues.

The PSI report section 6.2.2.2 (p.252) outlines several points requiring specific standards for soil disturbance activities, including for potential human exposure to mobilised contaminants and for reinstatement within one month of soil to an erosion resistant state.

The DSI report section 6.1.2 (p.338-339) is unable to determine compliance on some points, notably the amount of contaminated soil removed from the site and the time frame (2 months) of soil disturbance.

How are the compliances, or otherwise, on the points mentioned, to be determined?



## SO 19-21

And by what party?

What specific measures will be taken to minimise downwind movement of soil dust and potential soil contaminants during earthworks? (Dust from regular truck movements on the site has been an issue at times in the past.) Same question also applies to any asbestos work during building demolition etc.)

How will the earthworks / remedial works be managed site wide to ensure compliance with the above standards, if there are several developers across the overall RRA, each working within their own consent, potentially over a period of several years?

3) Construction noise 'contamination' issues

What if any regulations would apply to the site regarding working hours for construction activities?

Overall:

What party/parties is/are responsible for 'overseeing' compliance with the regulations around the consents? Is it PNCC, or Horizons? Or both? Or?

Practically, how are overall site compliances achieved when there potentially may be several developers working over various parts of the RRA site at any one time?

Thanks in anticipation of your reply in good time for me to consider it before submissions close next Tuesday 19th November.

Regards,

Rosemary Watson

## SO - 20-1

### District Plan Change E - Roxburgh Crescent Residential Area

|   |  |
|---|--|
| Your contact details  |  |
| First name  | Linda  |
| Last name   | Bell   |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.   |  |
| Postal address  | 6A Ayr Place, Hokowhitu, Palmerston North 4410                 |
| Email   | <a href="mailto:lindybell@xtra.co.nz">lindybell@xtra.co.nz</a> |
| Phone<br>Please provide a daytime contact number  | 021 253614   |
| Trade competition   |  |
| Would you gain an advantage in trade competition through this submission?   | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition. |  |
| Hearing   |  |
| Do you want to speak to Council in support of your submission?  |  |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?   |  |
| Your submission   |  |
| Submission table - Submission point 1   |  |

## SO – 20-2

|  |   |
|--|---|
| <p>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.</p> |   |
| <p>State the specific part of Plan Change E that your submission point relates to.<br/><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i></p>   | <p>3 story homes along the stop bank</p>  |
| <p>What's your attitude towards this specific part of Plan Change E?</p>   | <p>Oppose</p>   |
| <p>What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.<br/><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>  | <p>Delete the clause allowing homes along the stop bank to be built up to 3 stories and replace them with 2 storey homes</p>  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p>   | <ol style="list-style-type: none"> <li>1. The 'barrack' like homes shown on the 'artist's impression' would dominate the eastern horizon. This is the view that everyone would see every day when walking by the river.</li> <li>2. The 3 storey homes would dominate the whole of the Roxburgh Residential Area, plus when seen from the western river walk below these solid blocks would have zero fit with the neighbouring area.</li> <li>3. I walk along the river two or three times a week and ask myself has anyone involved in this development done the same, have they stopped and looked east and wondered about the images of three storey buildings look like across the green spaces in between? Two storey homes have much less impact and eyesore to those that enjoy the river walkway.</li> </ol> |
| <p>You can attach documents in support of your submission point</p>  |   |

## SO - 21-1

### District Plan Change E - Roxburgh Crescent Residential Area

|  |  |
|--|--|
| Your contact details   |  |
| First name   | Rebecca  |
| Last name  | Hambleton  |
| Organisation you represent<br>If applicable. Please only answer this question if you are speaking on behalf of an organisation.  |  |
| Postal address   | 557 Ruahine St   |
| Email  | <a href="mailto:bex.hambleton@gmail.com">bex.hambleton@gmail.com</a>                       |
| Phone<br>Please provide a daytime contact number   | +64274046926   |
| Trade competition  |  |
| Would you gain an advantage in trade competition through this submission?  | No   |
| Are you directly affected by an effect of the subject matter of the submission that:<br>(a) adversely affects the environment; and<br>(b) does not relate to trade competition or the effects of trade competition.  |  |
| Hearing  |  |
| Do you want to speak to Council in support of your submission?   | No   |
| Will you consider presenting a joint case with other submitters who make a similar submission at a hearing?  |  |
| Your submission  |  |
| Submission table - Submission point 1<br>You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it. |  |
| State the specific part of Plan Change E that your submission point relates to.<br><i>For example, Planning Maps - Properties in Titahi Bay with a Heritage Height Control</i>   | Size of sections and height of housing that will back on current homes in ruahine st       |
| What's your attitude towards this specific part of Plan Change E?  | Amend  |
| What decision are you seeking from the Council? Retain? Amend? Delete? Please specify.   | Allow single story homes only except along stop bank. Increase section sizes to allow this |

**SO – 21-2**

|  |  |
|--|--|
| <p><i>For example, remove the heritage height control, or at least increase the height allowance for this control by 1-2m.</i></p>                                 |  |
| <p>Please tell us the reasons for your submission point.<br/><i>For example, these height controls are set too low as they restrict development potential.</i></p> | <p>9m high homes backing onto current housing will encroach of privacy and sunlight into current homes</p> |
| <p>You can attach documents in support of your submission point</p>  |  |

19 November 2024

RAI 04 03  
2024  
AW:LMS

The Governance Team  
Palmerston North City Council  
Private Bag 11034  
PALMERSTON NORTH

[submission@pncc.govt.nz](mailto:submission@pncc.govt.nz)

Dear Madam/Sir,

**SUBMISSION: PROPOSED PLAN CHANGE E – ROXBURGH CRESCENT RESIDENTIAL AREA.**

Thank you for the opportunity to provide a submission on the Proposed Plan Change E: Roxburgh Crescent Residential Area.

Horizons Regional Council (Horizons) is responsible for managing natural resources across our region, which includes flood control, air and water quality monitoring, pest control, facilitating economic growth, leading regional land transport planning and coordinating the region's response to natural disasters.

Environmental planning is a key function. Horizons' integrated planning document, the One Plan, sets out four keystone environmental issues for the region – surface water quality degradation, increasing water demand, unsustainable hill country land use, and threatened indigenous biodiversity.

Horizons has no trade competition advantage in this submission. Our interest in the proposed plan change is primarily from our role as the regional authority for the area that is subject to the plan change. The submission reviews the proposed district plan change in light of its alignment with the Regional Policy Statement component of the One Plan and ensures that the proposed changes are consistent with our Regional Plan provisions.

In principle, Horizons supports Proposed Plan Change E as it contributes to creating a well-functioning urban environment by supporting the housing targets set in the Palmerston North Future Development Strategy 2024. Further, this approach aligns with the One Plan objective RPS-UFD-O1 and policy RPS-UFD-P1. However, we would like to underscore certain areas where further discussions and consideration may be beneficial as the plan change progresses.

Horizons' interest in proposed Plan Change E is as the regional authority for the affected area. The content of our feedback is twofold. It provides planning advice focused on whether the draft provisions give effect to the RPS and are consistent with a rule in the regional Plan (as per section s75(3) and (4) of the RMA. It also provides feedback in an 'advocacy' role on behalf of the District Advice, Emergency Management and River Management teams.

## Horizons' comments:

### Stopbank

The proposed works will involve works on and adjacent to the Lower Manawatū stopbank, a critical flood protection asset owned by Horizons, which currently provides 500-year flood protection from the Manawatū River. Maintaining the structural and functional integrity of this asset is critical for the safety of Palmerston North residents.

Horizons generally discourages any work within the designated stopbank zone, which includes the stopbank itself and the area within 8m from the toe of the stopbank (both sides). This is to minimise potential adverse effects on the stopbank's structural and functional integrity. Additionally, Horizons' operations team requires minimum clearance of 5m from the toe of the stopbank to facilitate site maintenance and repair activities.

To ensure this zone is accurately represented in Proposed Plan Change E, we provide the following comments and recommendations:

- **Structure Plan** – we note the structure plan outlines a 'no build zone' related to the stormwater easement. We support this inclusion.

However, we recommend that the structure plan also include the stopbank and 8m inland buffer from landward toe of the stopbank, as a 'stopbank restricted area' (or words to that effect).

Please note that One Plan rule LF-AWBD-R68 requires resource consent for certain activities (as listed in the rule) within 8m inland of the landward toe of a stopbank.

- **Chapter 10, Note to plan users:** We acknowledge the 'Note to plan users' in District Plan, Chapter 10, which appears before the new rules. While we support its inclusion, we suggest strengthening the language to better align with the One Plan requirements. The District Plan should clearly state that residential properties within 8m of the landward toe of the stopbank will likely require resource consent for certain activities.

We suggest to amend the wording as follows (additions shown as underline and deletions as ~~strikethrough~~):

**"Note to plan users:** any excavation or earthworks (including planting of trees and shrubs) or structures (including some fences) on or within 8m of the inland toe of the stopbank or any other structure that is maintained by Manawatū-Whanganui Regional Council for the purposes of flood control ~~may~~ will require consent from Manawatū-Whanganui Regional Council. Plan users are advised to consult with the Manawatū-Whanganui Regional Council for any works on or within 8m of the inland toe of the stopbank."

We recommend ensuring accurate references to "Manawatū-Whanganui Regional Council," which should include a macron over the "u" in Manawatū, a hyphen between "Manawatū" and "Whanganui", and an "h" in "Whanganui".

- We note the proposal to establish a new public entrance to the Manawatū River pathway. Given this will occur on the stopbank, resource consent may be required under One Plan Rule LF-AWBD-R68.
- We further wish to advise that, if higher flood protection standards are required in the future, Horizons may need to upgrade the stopbank, which could necessitate alterations to the public entrance path.

### Flooding and stormwater management

This site is adjacent to a Horizons stopbank, which was designed to provide a 0.2% AEP (1 in 500 year) standard of flood protection from the Manawatū River. While this stopbank provides protection against riverine flooding, it does not safeguard the area from localised flooding or stormwater inundation. Horizons supports the proposed plan change's regulatory measures related to onsite stormwater management and encourages additional on-site mitigation strategies to control runoff rates from any development. Increased runoff from new developments can exacerbate downstream flooding, whether from localised stormwater accumulation or from rivers, streams, or other water courses. In case where runoff increases, resource consent from Horizons is likely to be required.

Under One Plan Rule RP-LF-LW-R26, stormwater discharges to surface water and land is permitted, provided certain compliances and conditions are met. These conditions include ensuring that the discharge does not cause or exacerbate the flooding of any other property and there is no erosion beyond the point of discharge unless this is not practicably avoidable, in which case any erosion that occurs as a result of discharge must be remedied as soon as possible. Caution is advised when discharging stormwater across sloping land due to the potential for erosion. Resource consent will be required if stormwater discharge cannot meet the permitted activity standards. Additionally, if stormwater is discharged via a reticulated network, a consent from Horizons may also be necessary.

Any on-site stormwater discharges should be directed away from wastewater land application areas as this can reduce the efficiency of the wastewater system to treat wastewater. If the site has poorly drained soils, stormwater management will need to be carefully considered because poorly drained soils have a water table that are close to the surface or a compact subsurface layer that limits the rate that water can drain through the soil.

For more information about the discharge of stormwater and the One Plan visit: <https://www.horizons.govt.nz/HRC/media/Media/One%20Plan/17-Part-3-RP-LF-Land-and-freshwater.pdf>

If the compliance with these rules cannot be achieved a consent will be required to enable proper regulation and control.

### Sites Associated with Hazardous Substances (SAHS)

We wish to advise that Lot 1 DP 74592, located within the proposed rezoning area, is listed on Horizons' database as a potentially contaminated site associated with hazardous substances.

In terms of being a contaminated the Detailed Site Investigation report by Tonkin and Taylor (DSI) confirms a number of HAIL activities have occurred on this site, which is in line with Horizons' *Sites Associated with Hazardous Substances Database*, and contamination is present.

PNCC will need to follow the advice in the DSI in terms of soil disturbance and redevelopment, including obtaining the relevant resource consents with Horizons; as detailed below from the DSI;

- The *NES-Assessing and Managing Contaminants in Soil to Protect Human Health* will apply to the site if residential redevelopment is undertaken as HAIL activities have been, and are currently occurring on the site and subdivision and soil disturbance will likely be required during the redevelopment phase; and



- Due to the presence of asbestos, controls will be required during soil disturbance and redevelopment works in accordance with the Asbestos Regulations.”

### Transport

Horizons One Plan policy RPS-EIT-P5 (3) 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.*

Parts of One Plan policies RPS-EIT-P1, RPS-EIT-P2, RPS-EIT-P5 and RPS-UFD-P1 address regional transport related matters, while the Regional Land Transport Plan (RLTP) also aligns with these policies. The RLTP seeks to protect and improve the strategic transport network and create opportunity for the future uptake of public transport options.

The proposal to enable increased density in central parts of the city aligns well with public transport aspirations outlined in the Regional Public Transport Plan (RPTP). We are generally supportive of the proposed connection to Ruahine Street, as it will provide good access to public transport.

While acknowledging the relevant Transport Assessment and Urban Design Report, we emphasize the importance of ensuring an efficient transport network, supporting alternative transport modes, encouraging active transport options such as walking and cycling, and providing accessible transport infrastructure. These elements are critical to creating a sustainable and integrated transport system for the city.

### Land Disturbance

For land with pre-existing slopes of less than 20 degrees refer to Horizons One Plan Rule RP-LF-LAND-R1 that permits up to 2,500m<sup>2</sup> of land disturbance per property per 12 month period, subject to compliance with conditions.

For land disturbance greater than 2,500m<sup>2</sup> refer to One Plan Rule RP-LF-LAND-R6. For any proposed structures within or near waterways, consider One Plan Rule RP-LF-AWBD-R63 for culverts and Rule RP-LF-AWBD-R64 for other structures (including bridges, fords and other access structures). Land disturbance is also subject to *NES-Freshwater*.

For more information about earthworks including erosion and sediment control, visit Horizons website: <https://www.horizons.govt.nz/managing-natural-resources/consents-monitoring/earthworks>

For information on resource consents contact our Consents Team on [consents.enquiries@horizons.govt.nz](mailto:consents.enquiries@horizons.govt.nz) or ask for a Horizons Duty Planner on 0508 800 800. Alternatively visit our website: [www.horizons.govt.nz/managing-natural-resources/apply-for-consents](http://www.horizons.govt.nz/managing-natural-resources/apply-for-consents)

### Energy efficiency

Horizons One Plan RPS-EIT-P5 provides direction to territorial authorities in regards to energy efficient development:

1. *The Regional Council and Territorial Authorities must have particular regard to the efficient end use of energy in consent decision-making processes for large users of energy.*
2. *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.*
3. *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..*

### Conclusion

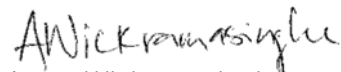
Thank you for the opportunity to provide feedback on Proposed Plan Change E. Horizons generally supports the proposed plan change, subject to the comments and recommendations outlined in this submission, specifically:

- Stopbank: Incorporate Horizons' recommendation to declare an 8m inland buffer from the stopbank to protect its structural and functional integrity.
- Flooding and stormwater management: Ensure compliance with relevant One Plan rules for stormwater management and discharge.
- Sites associated with hazardous substances (SAHS): Address the potential contamination on Lot 1 DP 74592 during the rezoning process.
- Transport: Promote active and sustainable transport options including walking, cycling, and public transport.
- Land disturbance: Ensure compliance with applicable One Plan rules for land disturbance, including guidance on erosion and sediment control.
- Energy efficiency: Align the plan change with the energy efficiency directives outlined in the One Plan.

Horizons seeks the relief set out above, or any further, alternative, or consequential relief necessary to address the matters raised and achieve the outcomes sought.

Our staff are available to provide additional input or to discuss this feedback further. If you have any questions or require clarification, please feel free to contact Aruna Wickramasinghe (Aruna.Wickramasinghe@horizons.govt.nz) or Leana Shirley (Leana.Shirley@horizons.govt.nz).

Yours sincerely,



Aruna Wickramasinghe  
**SENIOR POLICY PLANNER**

## SO - 23

### District Plan Change E - Roxburgh Crescent Residential Area

|  |   |
|--|---|
| Your contact details   |   |
| First name   | jackie  |
| Last name  | carr  |
| Organisation you represent                                     |   |
| Postal address   | 56 newcastle st.  |
| Email  | <a href="mailto:jackiecarr@hotmail.com">jackiecarr@hotmail.com</a>  |
| Phone  | 063586858   |
| Hearing  |   |
| Do you want to speak to Council in support of your submission? | Yes   |
| Your submission  |   |
| Do you support the proposed classification?                    | No  |
| Please tell us more about your thoughts.                       | This area is located adjacent to floodplain & a recreation area well-used by locals for walking and cycling. Nearby are groups of native trees planted by my family and other members of Forest & Bird in the 1990's- these now increase the scenic value & local biodiversity. Some residential development is ok but not Over 100 new homes crammed in & with little thought given to the value of green space & landscaping.   |
| Any other comments   | The height limit should be 2 storey not 3. An increased residential population of over 100 homes would put undue pressure on existing infrastructure with Winchester school opposite (with pedestrian x.g) & already there is congestion at peak times at the Hokowhitu/Albert St roundabout with Massey & southbound traffic and St. James school nearby. A community garden would be much appreciated by the local residents and community and sustainable use of this green space & encourage neighbourly-ness. A social and ecological and good long term use of this PUBLIC SPACE for which we pay rates to be managed in a well-planned sustainable way by planners and ratepayers not giving priority to the short term, money making profiteers at the expense of the environment, peoples health and well being and a sense of community for all to benefit from. Climate change means we have to acknowledge the increased frequency of flooding etc & adapt our plans accordingly. |