



Palmerston North City District Plan

Proposed Plan Change E: Roxburgh Residential Area

**Summary of Decisions Requested from Original
Submissions
&
Copies of Original Submissions**

4 December 2024

PUBLIC NOTIFICATION OF SUMMARY OF SUBMISSIONS UNDER THE RESOURCE MANAGEMENT ACT 1991

PALMERSTON NORTH DISTRICT PLAN PROPOSED PLAN CHANGE E: ROXBURGH RESIDENTIAL AREA

The Palmerston North City Council gives NOTICE as required by Clause 7 of the First Schedule of the Resource Management Act 1991, of the availability of a summary of decisions requested by people making submissions to Proposed Plan Change E: Roxburgh Residential Area.

The Council has received 23 original submissions on Plan Change Proposed Plan Change E: Roxburgh Residential Area.

The changes from Proposed Plan Change E to the District Plan are summarised as follows:

Changes to District Plan Section 4 - Definitions

- Insert new definitions for 'Roxburgh Residential Area' and 'Principal Bedroom'
- Amend the definition for 'Open Construction'.

Changes to District Plan Section 7 - Subdivision

- Add the Roxburgh Residential Area to Section 7 Subdivision.
- Add the objectives, policies, and rules that address resource management issues common to the Residential Area to the Roxburgh Residential Area.
- Introduce the Roxburgh Residential Structure Plan (Map 7.10) and the Roxburgh Residential Roding Cross Sections (Maps 7.10A and 7.10B) to guide future development in the Roxburgh Residential Area.
- Add provisions specific to the Roxburgh Residential Area in objectives, policies, and rules of Section 7.

Changes to District Plan Section 10 – Residential Zone

- Add the Roxburgh Residential Area to Section 10.
- Add the objectives, policies, and rules that address resource management issues common to the Residential Area to the Roxburgh Residential Area.
- Add provisions specific to the Roxburgh Residential Area in objectives, policies, and rules of Section 10.

All information, summary of decisions requested in the original submissions, and submission forms are also available on the Council website: pncc.govt.nz/roxburgh.

The summary of decisions requested in the original submissions and the original submissions themselves, are available for inspection at the following locations when these facilities are open to the public:

- The Customer Service Centre, Palmerston North City Council, Civic Administration Building, The Square, Palmerston North;
- The Palmerston North Central Library, The Square, Palmerston North;
- Community Libraries: Roslyn, Awapuni, Te Patikiki, Ashhurst, the Mobile Library, and Linton Camp.

The Palmerston North City Council is now calling for **further submissions in support of, or in opposition to**, the submissions lodged to Proposed Plan Change Proposed Plan Change E: Roxburgh Residential Area. Under clause 8 of the First Schedule of the Resource Management Act 1991, the following parties may make a further submission either supporting or opposing submissions made on this plan change:

- any person representing a relevant aspect of the public interest;
- any person who has an interest in the proposed plan change that is greater than that of the general public; and
- the Palmerston North City Council itself.

Further submissions must be in writing in the form prescribed (Form 6) in the Resource Management (Forms) Regulations 2003 or similar, including submissions via email. Further submissions lodged by way of e-mail do not require a signature.

Further submission forms are available online, at the above offices or can be downloaded from the Council website: pncc.govt.nz/Roxburgh.

The closing date for making further submissions is **4pm, 19 December 2024**.

Further submissions to the plan change must be lodged to the Council by one of the following options:

Online Submission Form

Email: submission@pncc.govt.nz, in accordance with the submission form, and put Proposed Plan Change E: Roxburgh Residential Area in the subject line.

Posted to:

Democracy & Governance Manager
Palmerston North City Council
Private Bag 11-034
PALMERSTON NORTH

or Delivered to:

Democracy & Governance Manager
c/- Customer Service Centre
Palmerston North City Council
The Square, PALMERSTON NORTH

Once the closing date for lodging further submissions has passed, the Council will convene hearings to consider submissions and further submissions that have been lodged and issue decisions on the matters raised. Anyone who has made a submission or further submission and who has indicated that they wish to be heard will have the right to attend the hearings and present their submission. On receiving notice of a decision on their submission, any person who disagrees with or is dissatisfied with the decisions made may refer the decision to the Environment Court for further consideration.

IMPORTANT: Any person making a further submission to Proposed Plan Change E: Roxburgh Residential Area must serve a copy of their further submission on the person who made the original submission within five working days of lodging their further submission with the Council.

Enquiries about Proposed Plan Change Proposed Plan Change E: Roxburgh Residential Area can be made to Eamon Guthrie, Senior Planner, phone (06) 356 8199 or email: eamon.guthrie@pncc.govt.nz.

Waid Crockett

Chief Executive Officer
Palmerston North City Council

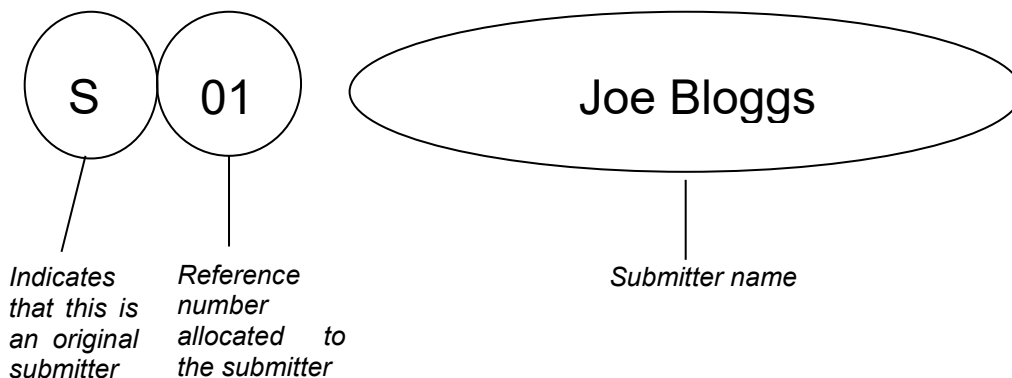
4 December 2024

INTRODUCTION

The summary in Part I of this document has been prepared to assist the Council in meeting notification requirements under Clause 7 of the First Schedule of the Resource Management Act 1991.

It has been prepared to assist those who may wish to prepare a further submission, or those preparing evidence or hearing evidence in respect of Proposed Plan Change E: Roxburgh Residential Area. **Please note that a copy of the original submissions has been enclosed as Part II of this document. This summary does not replace the original submissions and you are encouraged to refer to these in parallel with the summary.**

Submissions are listed within the Summary of Submissions under the following header format:



Submissions typically have two parts:

The Submission: Usually stating whether the submitter supports or opposes the plan change either in whole or in part, and the reasons for that support or opposition.

Decision Requested: The action which the submitter requests the Council to take.

MAKING A FURTHER SUBMISSION

The following parties may make a further submission either supporting or opposing submissions made on this plan change:

- any person representing a relevant aspect of the public interest;
- any person who has an interest in the proposed plan change that is greater than that of the general public; and
- the Palmerston North City Council itself.

A further submission must be made by making a written further submission in general accordance with Form 6 of the Resource Management Act (Forms) Regulations 1991, or similar. A further submission can be made either supporting (in whole or in part) or opposing (in whole or in part) any original submission. A further submission cannot traverse any issue that is not covered by the original submission but can give reasons for the support or opposition to the original submission.

You are required to serve a copy of your further submission on the original submitter within 5 working days of the further submission being made to the Council. A list of the submitter's addresses is included in Part II of this document.

PROPOSED PLAN CHANGE E: ROXBURGH RESIDENTIAL AREA

Part I – Summary of Submissions

Note: That requested additional text is underlined and deleted text ~~struck through~~.

Submitter	Submission Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested
S08 – Robert M Hodgson	S08.001	General – Climate Change and Flooding	Support in part	Although generally supportive of the proposal is concerned that in light of climate change, increased river flows and frequency of major floods, a conservative approach is taken to the design, location and resilience to flooding of the new housing.	Account of climate change, increased river flows, and frequency of major flow is taken to the design, location and resilience to flooding of the new housing.
S22 – Horizons Regional Council	S22.014	General – Energy Efficient Development	Support in part	Outlines that One Plan RPS-EIT-P5 provides direction to territorial authorities regarding energy efficient development	Align the plan change with the energy efficiency directives outlined in the One Plan.
S19 – Rosemary Watson	S19.006	General - Fencing	Amend	Concerned that '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 and that Tilbury Avenue property owners should not be expected to contribute to any work required to attain potential new 'adequate' shared boundary fencing standards.	Include provision for recompense agreements and/or fencing covenant clauses under the Fencing Act 1978 and/or other appropriate legislation, with these to apply to adjoining landowners/occupiers from removal of Reserve status through land development changes up to and including first residential homeowners.
S04 – Jack McKenzie	S04.001	General – Heights and Density	Support	The height restrictions seem about right. 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.	Retain the proposal.
S22 – Horizons Regional Council	S22.013	General – Land Disturbance	Support	Advises for land with pre-existing slopes of less than 20 degrees up to 2,500m ² of land disturbance per property is permitted per 12 month period and for disturbance greater than 2,500m ² that One Plan Rule RP-LF-LAND-R6 should be referred to.	No specific decision requested.

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				Additionally, for any proposed structures within or near waterways, 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) needs to be considered. Land disturbance is also subject to NES Freshwater.	
S12 – Paul and Annette Gregg	S12.001	General - No specific provision referenced	Support	Considers that the plan change provides a great opportunity for the Council to demonstrate that they are making provision for possible retreating in the future from flooding.	No specific change requested.
S02 – Sophie Boulter	S02.001	General – No specific provision referenced	Amend	Whether there was consideration done for the school close to this area that the houses will be in zone for. If 150+ houses are built its likely a significant percentage will have primary aged 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. Same applies to intermediate and high school. Could another school be considered in the area?	Amend the plan change to reconsider the impact on school zones.
S06 – Edrei Valath	S06.002	General – No specific provision referenced	Oppose	Concerns that rapid residential growth without considering school capacities could drastically impact the quality of education in the community.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.
S06 – Edrei Valath	S06.005	General – No specific provision referenced	Oppose	Concerns that nearby shops and small businesses may struggle to meet the sudden surge in demand from new residents.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.
S07 – Patrick Henderson	S07.001	General – No specific provision referenced	Amend	Although the broader concept of the plan change is supported is concerned that there is not enough low cost first-time buyer homes in Palmerston North and that there are too many high value large homes being built .	Future housing is dedicated to first home buyers, with an agreement in the event of sale that, the council has first option to purchase for on-sale to first home buyers.

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S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.001	General – No specific provision referenced	Support in part	<p>Broadly supportive of redeveloping this pocket of existing industrial activities for housing but considers 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.</p> <p>Also considers that enabling new housing, in places safe from natural hazards and using quality building standards that prioritise healthy homes is essential to lifting Māori and Pacifica living standards and meeting Council’s responsibilities under the Partnership Agreement and as a Te Tiriti partner.</p>	Retain and adopt the notified provisions and structure plan provided that housing is safe from flood risk hazards and any risks from previously contaminated land and subject to further amendments to address the potential noise, stormwater and natural hazards effects of adopting the proposed provisions.
S18 – Doug Kidd	S18.003	General – No specific provision referenced	Amend	Notes that during city council hearings to rezone the Waterloo Reserve, a Councillor outlined that the developer had raised concerns regarding the safety of pedestrians and cyclists if the reserve was retained and considers that the safety of city residents and visitors is important.	Clarify the councillor's and developer's concerns regarding the safety of pedestrians and cyclists.
S22 – Horizons Regional Council	S22.001	General – No specific provision referenced	Support	Supports the plan change as it contributes to creating a well-functioning urban environment by supporting the housing targets set in the Palmerston North Future Development Strategy 2024. The approach aligns with the One Plan objective RPS-UFD-O1 and policy RPS-UFD-P1.	No specific decision requested.
S23 – Jackie Carr	S23.002	General – No specific provision referenced	Support in part	Outlines that there are nearby groups of native trees planted which increase the scenic value & local biodiversity.	Establish a community garden..
S14 – P.N. Engineering Ltd – Philip Nell	S14.001	General – No specific provision referenced.	Support in part	Concerns about changes to the existing road layout and how that may impact current use and access to their units at 25 & 25A Roxburgh Crescent. Currently there are two access points, each about 4m wide, on the northern and southern sides of the site with off street parking for staff in between.	Consider the current use of the owners and business occupiers in the road layout changes and the timing of this work.

Submitter	Submission Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested
				As there is currently no curbing on the western side of the road it is noted that this site access for staff and freight convenient.	
S19 – Rosemary Watson	S19.0012	General – Noise	Amend	<ul style="list-style-type: none"> The noise assessment recommends that Residential Zone noise provisions are applied to the RRA but it appears to be weighted towards managing reverse sensitivity of new residential living among existing industry operation as development proceeds. No direct consideration of construction-related noise relief for the existing residential neighbourhood over the proposed long time frame of ongoing site development 	Amend the provisions to include RRA-wide set of working hours for site development/building activities which generate significant noise.
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.002	General – Objectives and Policies	Support in part	<p>Considers that water quality in the Manawatū Awa is poor and reduces Rangitane’s ability to interact with wai and undertake cultural practices, thereby impacting on their cultural well-being.</p> <p>Further considers that the plan change 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.</p>	<p>Amend the proposed new objectives and policies in Section 10 and Section 7 for the Roxburgh Residential Area to address the following:</p> <ul style="list-style-type: none"> Redevelopment of the area assists in protecting and restoring the mauri of the Manawatū Awa, including through the capture and pre-treatment of stormwater on-site; Preferential use of indigenous species that would be expected to be present in that place when undertaking landscaping, .
S06 – Edrei Valath	S06.003	General – Open Space and Recreation	Oppose	Concerns about the absence of nearby parks, playgrounds and recreational facilities proposed could negatively impact the quality of life for incoming residents and place undue stress on existing ones.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and

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					recreational capacity to better accommodate gradual growth.
S06 – Edrei Valath	S06.004	General – Open Space and Recreation	Oppose	Concerns that increasing housing density next to a reserve area could compromise the natural landscape and reduce the peaceful experience. More people accessing the reserve could lead to erosion, littering, and general wear and tear on pathways and natural habitats.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.
S22 – Horizons Regional Council	S22.006	General – Stop banks	Support	The new public entrance to the Manawatū River pathway will occur on the stop bank, and resource consent may be required under One Plan Rule LF-AWBD-R68. If higher flood protection standards are required in the future, Horizons may need to upgrade the stop bank, which could necessitate alterations to the public entrance path.	No specific decision requested.
S22 – Horizons Regional Council	S22.008	General – Storm water and Flooding	Support	Stop bank provides protection against riverine flooding, but it does not safeguard the area from localised flooding or stormwater inundation. Encourages additional on-site mitigation strategies to control runoff rates from development. Increased runoff from new developments can exacerbate flooding downstream.	No specific decision requested.
S22 – Horizons Regional Council	S22.009	General – Storm water and Flooding	Support	Outlines that stormwater discharges to surface water and land is permitted under the One Plan. Caution is advised when discharging stormwater across sloping land due to the potential for erosion. Additionally, if stormwater is discharged via a reticulated network, a consent from Horizons may also be necessary.	No specific decision requested.
S22 – Horizons Regional Council	S22.010	General – Storm water and Flooding	Support	Encourages on-site stormwater discharges to be directed away from wastewater land application areas as this can reduce the efficiency of the wastewater system to treat wastewater.	Ensure that on-site stormwater discharges should be directed away from wastewater land application areas.

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				If the site has poorly drained soils, stormwater management effects need to be considered as 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.	
S23 – Jackie Carr	S23.003	General – Storm water and Flooding	Support in part	Acknowledge as a result of climate change there is increased frequency of flooding etc is required and there is a need to adapt our plans accordingly.	Adapt the plans to acknowledge climate change.
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.009	General – Stormwater and Flooding	Support in part	<p>The Stormwater Servicing Assessment indicates that the stop bank near the Roxburgh Crescent Residential Area is susceptible to undermining and foundation failures, with a 15% probability of failure during a 1% AEP flood event based on 1993 conditions.</p> <p>A 15% chance of failure over 100 years is considered significant and needs to be adequately planned for, particularly as the assessment doesn't address how climate change might exacerbate these risks, with projected increases in annual precipitation and rainfall intensity in the Manawatū region and the likelihood that the area will attract households with older people and small children.</p> <p>Acknowledges that although the area is within the Lower Manawatū River Control Scheme's protection, where additional flood hazard measures may not be required under Regional Policy Statement HAZ-NH-P10, that R10.6.1.8 should adopt the policy direction in HAZ NH-P10 by requiring a safe access route between dwellings and an evacuation area.</p>	<p>Amend R10.6.1.8 and R10.6.3.3 to require an access route to a safe area for evacuation from dwellings, as described in clause 4b of HAZ-NH-P10 of the RPS.</p> <p>Ensure 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 are avoided.</p> <p>Retain the advice note to plan users regarding stop banks in R10.6.1.8 and cross-reference in any other relevant rules.</p>
S06 – Edrei Valath	S06.001	General – Traffic and Transport	Oppose	Concerns that the development could add hundreds of additional vehicle trips daily, causing bottlenecks and hazardous conditions at key intersections.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.

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S22 – Horizons Regional Council	S22.012	General - Transport	Support	Enables increased density in central parts of the city, which aligns well with public transport aspirations in the Regional Public Transport Plan (RPTP). The proposed connection to Ruahine Street is supported, as it provides good access to public transport.	No specific decision requested.
S19 – Rosemary Watson	S19.007	General – Trees	Amend	<p>Concerns raised regarding existing trees within Waterloo Park Reserve and on adjoining Tilbury Avenue properties and the area subject to the proposed plan change, including:</p> <ul style="list-style-type: none"> • While trees on adjoining Tilbury Avenue properties are not identified as 'notable trees' and not protected under section 17 of the District Plan they are 'significant trees' within the gardens they are located in and will provide some screening and privacy between existing and future dwellings in the Roxburgh Residential Area. • A number of mature trees are scheduled to be felled as part of future development, including trees in Waterloo Park Reserve. • Notes that the introduction section under Section 10 of the District Plan states that the design of new housing development needs to limit adverse effects such as the removal of established vegetation and queries where regard to this has been had in the current Plan Change. • Notes that Section 17 of the District Plan 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", and that no consideration and evaluation of benefits within Waterloo Park Reserve has been done. 	<ul style="list-style-type: none"> • Include suitable recompense agreements for Tilbury Avenue property owners for falling/dead trees on their properties due to unbalancing by trimming tops back to the boundary and/or root damage from site work in the Roxburgh Residential Area. • Include 'current value' assessments of existing trees and vegetation across the proposed Roxburgh Residential Area , along with other infrastructure assessment.

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S10 – Jason Temperley	S10.002	General - Stormwater	Amend	There are no stormwater easements, or no build zones shown on Figure 1 of the proposed plan raising concerns that surface flooding will continue to be a recurring issue.	Amend the structure plan and provisions to outline an area for a storm water easement or no build area.
S11 – Frances Holdings Limited	S11.002	Map 7.10 A & B: Rooding Cross Sections	Support in part	<p>Concerns expressed about the following:</p> <ul style="list-style-type: none"> • The ability of the 13m wide road to function properly within the residential development, noting that the existing width of Roxburgh Crescent is 12.80m. • Lack of detail regarding location of supporting infrastructure in the rooding corridor. • The function of the road cross section for vehicles. • The need for the number of car parks shown the 20.5m wide cross section, noting that the 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. 	<p>Amend the Rooding Cross Sections to be redrawn to be 12.80 width.</p> <p>Amend the cross sections to show where the 2 Power & 2 Telecom ducts, 2 Gas mains, 2 watermains, Sewer (pressure or gravity), Stormwater, 2 subgrade drains, street trees, biofiltration and the street lighting will fit within the 12.80m wide corridor.</p> <p>Either provide 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; or revise the 12.8m cross section accordingly.</p> <p>Amend the Rooding Cross Sections section to show parallel rather than perpendicular carparks.</p>
S18 – Doug Kidd	S18.004	Map 7.10 Structure Plan (inferred)	Oppose	Notes that residents in the area bought their properties because of the reserve and a significant portion of local residents supported retaining the reserve as part of the neighbourhood identity.	Retain Waterloo Reserve as it currently exists.
S19 – Rosemary Watson	S19.002	Map 7.10 Structure Plan (inferred)	Oppose	Notes that there is significant local public interest in community use of this land as future orchard/walkway and that amenity values for Tilbury Avenue residents adjacent to the Reserve nature strip should be preserved.	Delete and retain the Reserve for community use.
S15 – Grant Higgins	S15.001	Map 7.10: Roxburgh Crescent Structure Plan	Support in part	Notes that flexibility in structure planning is important and that change may be required to make a development fit. Also considers that less intensive development in the area will help to mitigate stormwater and traffic effects.	Amend the structure plan to allow flexibility and increase the minimum lot size to 350m ² .

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S10 – Jason Temperley	S10.001	Map 7.10: Structure Plan	Amend	<p>The minimum lot size for the amount of stories or occupants may create too dense a housing development to fit in well with the surrounding neighbourhood, with this affecting the availability of outdoor space for recreation activities and rubbish storage and traffic flow in the surrounding area as Albert St, and Ruahine Street are the only main routes out.</p> <p>Considers a minimum lot size of 250m² is considered inadequate for a two-storey home or for a family.</p>	Amend the structure plan and provisions to increase the minimum lot size.
S11 – Frances Holdings Limited	S11.010	Map 7.10: Structure Plan	Support in part	The Council has approval from the Department of Conservation that the proposed Roxburgh Crescent reserve is exchanged for an existing reserve located west of Tilbury Avenue. Although supported in principle it is noted that this cannot be confirmed until the land exchange has been executed.	Execute the land exchange before the plan change is approved.
S22 – Horizons Regional Council	S22.005	Rule 10.6.1.8 – Note to Plan Users	Support in part	Bolster the language of the 'Note to plan users', to align with the One Plan requirements.	<p>Amend the wording of the 'note to plan users' as follows (additions shown as <u>underline</u> and deletions as strikethrough):</p> <p>"Note to plan users: any excavation or earthworks (<u>including planting of trees and shrubs</u>) or structures (<u>including some fences</u>) on or within 8m of <u>the inland toe of the stopbank or any other structure that is maintained by Manawatū-Whanganui Regional Council for the purposes of flood control</u> may <u>will</u> require consent from Manawatū-Whanganui Regional Council. Plan users are advised to consult with the Manawatū-Whanganui Regional Council for any works on <u>or</u> within 8m of <u>the inland toe of the stopbank.</u>"</p>

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					Recommend using 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".
S19 – Rosemary Watson	S19.003	Rule 10.6.1.8 (c)(iii), (f), and (g)(i)(b) (inferred)	Amend	<p>Concerned with the proposed height recession planes on the Tilbury Avenue boundary, and consequent shading, overlooking and privacy issues, noting:</p> <ul style="list-style-type: none"> • Shading at winter solstice as shown in the PNCC modelling may not be as extensive as predicted at 27 Tilbury Avenue for either single- or 2-storey buildings but will affect the indoor living spaces along Tilbury Avenue properties, where the dwellings are located closer to the boundary. • Shading is an issue at 27 Tilbury Avenue, as mature trees to the south of the current vegetable area in the section prevent any suitable relocation. • Overlooking would affect Tilbury Avenue properties if 2-storey buildings are permitted and have eye-level window(s) to the south. It would also affect outdoor amenity areas to their north, as well as inside living areas, and lead to some loss of privacy from 'overhearing' due to closeness to the boundary. <p>Single-storey and 2-storey options would add oppressive physical mass to northern views from Tilbury Avenue properties, while the bulk of single-storey buildings as close as 1.5 m from the boundary would be intrusive if narrow section widths are applied.</p>	<ul style="list-style-type: none"> • Ensure that the written description of the height recession plane diagram more accurately reflects the compound angles at the rear of diagram (Rule 10.6.1.8(g)(i)b) vs. exception b., in relation to Fig.1 HRP for the RRA); • Consider adding an extra Figure for Tilbury/Ruahine boundary sections. • Limit buildings adjacent to Tilbury Avenue boundaries to single-storey; <ul style="list-style-type: none"> ○ and/or allow clerestory windows only on south-facing walls of those buildings; ○ and/or increase lot sizes (widths) from minimum 250m² in that area; ○ and/or coordinate design across the row of lots to avoid blocky 'terrace-like' construction.
S19 – Rosemary Watson	S19.008	Rule 10.6.1.8 (f) (inferred)	Amend	Concerns raised regarding proposed riverfront building height limits, including:	Amend the height performance standards to limit building height to a 2-storey, 9 metre maximum .

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				<ul style="list-style-type: none"> • Three-storey buildings will dominate and overwhelm that section of the River Park they overlook. The purchase of Horizons land to the east of the Roxburgh Crescent site, will bring the proposed Roxburgh Residential Area and the buildings on it closer to the stop bank than currently. • 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 open space natural character. • Although the s32 Report (p.132) outlines that "the utilitarian scene [of the current industrial area, viewed from the stopbank] contrasts jarringly with the expansive green landscape of the river corridor" a similar result from the proposed residential building bulk is also queried. • Three-storey buildings are not needed to "help define the edge of a large open space" (p.50), as the stop bank itself does that perfectly well. • 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. As the stop bank height highlighted in the s32 Report (p.433) is only 2.5 m, it is noted that a 2-storey buildings (max. 9 m) would still allow those benefits for those in the riverfront dwellings, whilst providing the desired 'passive surveillance' over the park and users. 	
S17 – Rowan Bell	S17.001	Rule 10.6.1.8 (f) (inferred)	Support in part	Contrary to the plan change information provided that the proposed guidelines will help ensure the new area fits in well with the surrounding neighbourhood, is concerned that 3 storey housing overlooking the river walkway will be an	Amend the proposed 3 storey height along the stop bank with 2 storeys.

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				eyesore and monopolise the landscape, losing its ambience and tranquillity.	
S18 – Doug Kidd	S18.002	Rule 10.6.1.8 (f) (inferred)	Oppose	Notes the current development plan allows for three story, 11m, housing on the river front and that the adjacent river walkway is a high use area giving the impression of a semi-rural park setting. Consequently, has concerns that allowing buildings that can be seen from the foot paths will reduce the feel of the walkway.	Restrict building height to two storeys.
S18 – Doug Kidd	S18.001	Rule 10.6.1.8 (f), (g), and (i) (inferred)	Amend	<p>The building plans call for Notes either 1 or 2 story building built on the boundary to Tilbury Avenue and three-story buildings along the river frontage of the development is proposed and is concerned that this will cause shading and privacy effects amongst residents living on the properties adjacent to the Roxburgh Crescent.</p> <p>Highlights that many of the residents purchased the properties preceding the proposed development and have orientated their homes and lifestyles to face the Roxburgh Crescent development and restricting the impact of the development would offset the disappointment of the loss of the reserve and the development of high-density housing.</p>	Restrict height, maximise building setbacks from property boundaries and eliminate windows with a direct view of existing resident properties to minimize shading concerns.
S11 – Frances Holdings Limited	S11.007	Rule 10.6.1.8(c)(iii)	Oppose	The number of buildings per lot is unworkable as proposed and needs to be amended to a range of lot sizes within the lot size standard.	Amend rule 10.6.1.8(c)(iii) as follows: <ul style="list-style-type: none"> a. One dwelling unit on <u>lots of 250 m2 to 400m2.</u> b. Two dwelling units <u>on lots of 400 m2 to 600m2.</u>
S20 – Linda Bell	S20.001	Rule 10.6.1.8(f) (inferred)	Support in part	<p>Concerns that the effect 'barrack' like homes shown on the 'artist's impression' would dominate the eastern horizon.</p> <p>3 storey homes would dominate the whole of the Roxburgh Residential Area. When seen from the western river walk below these solid blocks would have zero fit with the neighbouring area.</p> <p>The effects of two storey homes have much less impact and eyesore using the river walkway.</p>	Amend the provisions for buildings to be 2 stories.

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S21 – Rebecca Hambleton	S21.001	Rule 10.6.1.8(f) (inferred)	Support in part	Concerns that 9 metre high homes backing onto current housing will encroach of privacy and sunlight into current homes.	Amend the provisions to be single story homes, except along stop bank, and increase section.
S23 – Jackie Carr	S23.001	Rule 10.6.1.8(f) (inferred)	Support in part	Concerns about number of new homes crammed in & with little thought given to the value of green space & landscaping and would put undue pressure on existing infrastructure.	Reduce the building height limit to 2 storeys.
S11 – Frances Holdings Limited	S11.006	Rule 7.6.2.6 (c)	Support in part	Although the proposed minimum lot size of 250 m2 and maximum of 500 m2 are generally considered to be appropriate site planning is showing that in a few cases a larger section may be necessary.	Increase the maximum lot size to 600 m2.
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.006	Rule 7.6.2.6 and Rule 10.6.3.3(vii)	Support in part	<p>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), it has not been included in the proposed provisions, specifically R7.6.2.6.</p> <p>Notes that although bullet point 5 in proposed R10.6.3.3 vii Stormwater Design addresses the permeable surfaces requirements it 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.</p>	<p>Amend R7.6.2.6 and R10.6.3.3(vii) to include a requirement for a Stormwater Design or Management Plan to be prepared, as a performance standard.</p> <p>Amend the Stormwater Design or Management Plan performance standard addresses all of the matters outlined in Section 3.4 of the Stormwater Servicing Assessment.</p>
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.004	Rules 7.6.2.6(d), 10.6.1.8, 10.6.3.3	Support in part	The Stormwater Servicing Assessment indicates that as the Roxburgh Residential Area is at the bottom of the catchment of specific stormwater management solutions will need to be implemented. It is noted that some of these required solutions do not appear to be reflected in the proposed provisions.	<ul style="list-style-type: none"> • Amend Section 7 – Subdivision to include the following minimum requirements: <ul style="list-style-type: none"> ○ 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;

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					<ul style="list-style-type: none"> ○ 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

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					<p>site investigation, as referenced in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.</p> <ul style="list-style-type: none"> • Amend R10.6.1.8 and R10.6.3.3 in Section 10 - Residential to include the following minimum requirements: <ul style="list-style-type: none"> ○ roof leaders to be directly connected to the stormwater network, ○ rooves are to be zinc and heavy metal free.
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.007	Rules 7.6.2.7 and 10.6.3.4.	Support in part	<p>Considers that public or limited notification should not be expressly excluded, unless there is certainty that the provisions will ensure good outcomes are achieved.</p> <p>Contends that as stormwater quality and quantity effects of re-zoning for residential development are not appropriately mitigated by the provisions as currently drafted there should be an opportunity for potential effects to be identified and addressed through notification processes, including consideration of the need to notify Horizons Regional Council and Rangitāne.</p>	Amend R7.6.2.7 and R10.6.4.3 to enable limited notification in cases where the proposed provisions to manage stormwater effects are retained.
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.012	Section 10: Objective 16, Rule 10.6.1.8, Rule 10.6.3.3(j)	Support in part	<p>Considers it is not clear from the s32 Evaluation Report how adverse effects on new residents in the zone will be managed during the 'gradual transition' from current industrial activities to full residential development.</p> <p>Notes that heavy vehicles will still continue to service the area while industrial activities remain and that the s32</p>	Amend Section 10 by inserting a new policy 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.

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				Report seems to erroneously assume these issues will be resolved by re-zoning and applying residential noise standards. Consequently, is concerned that 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 Acoustic Assessment Report.	Amend R10.6.1.8 by inserting a performance standard requiring assessment and consideration of the need for noise mitigation measures within new dwellings. Amend R10.6.3.3(j) by inserting noise effects from existing and lawfully established industrial activities as a matter of discretion.
S11 – Frances Holdings Limited	S11.017	Section 10: Policy 16.1	Oppose	Considers that this policy is redundant as this matter is determined at subdivision consent and is already addressed in Section 7.	Delete Policy 16.1.
S11 – Frances Holdings Limited	S11.018	Section 10: Policy 16.3	Support in part	Considers that the wording of this policy is unclear and requires further clarification.	Reword Policy 16.3 to provide improved clarification of the policy intent.
S11 – Frances Holdings Limited	S11.019	Section 10: Policy 17.3	Oppose	Considers that the policy should be deleted on the basis that neither permeability standards nor attenuation are required given the commitment to the new outfall infrastructure.	Delete Policy 17.3.
S09 – Palmerston North City Council	S09.001	Section 10: Rule 10.6.1.8 and Rule 10.6.3.3	Support in part	Concerns regarding the use of copper and zinc roofing, guttering and cladding materials. Notes that 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 and that Council has a responsibility to ensure that these products are treated to avoid discharge of contaminants to downstream watercourses such as the Manawatū River.	Add a new policy <u>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.</u> <ul style="list-style-type: none"> Add a new performance standard to Rule R10.6.1.8 Dwellings within the Roxburgh Residential Area as follows: m) <u>Where new buildings and structures, or additions and alterations to existing buildings and structures, use copper or zinc cladding and/or</u>

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					<p><u>roofing materials (including guttering and spouting) these materials are sealed or otherwise finished to prevent water runoff which contains copper or zinc.</u></p> <ul style="list-style-type: none"> Amend Rule 10.6.3.1 Buildings or structures that do not comply with performance standards for permitted and controlled activities as follows: <p>Any building or structure which does not comply with the performance standards for Permitted or Controlled Activities in relation to</p> <p>...</p> <p><u>xviii Copper and zinc building materials in Rule 10.6.1.8 m)</u> are Restricted Discretionary Activities with regard to:</p> <p>...</p> <ul style="list-style-type: none"> <u>How stormwater from copper and zinc building materials will be treated to prevent these contaminants from entering the stormwater network.</u>
S09 – Palmerston North City Council	S09.004	Section 10: Rule 10.6.1.8(b)	Support in part	<p>The minimum floor level requirement in the Performance Standard needs to be adjusted as:</p> <ul style="list-style-type: none"> The area is protected by Horizons stop banks from a 0.5% AEP flood event. The minimum floor level should align with the wider residential area, based on a 2% AEP (1 in 50-year flood event) with appropriate freeboard, noting that 	<p>Amend performance standard R10.6.1.8(b) as follows: Floor levels must be above the flood and stormwater inundation level predicted for a 0.5%<u>2%</u> annual exceedance probability (AEP) (1 in 200<u>50-year</u>) flood event (<u>including</u></p>

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				<p>this aligns with Building Act requirements and is consistent with Horizons One Plan policy NAZ-NH-P10.5.</p> <ul style="list-style-type: none"> • A 2% AEP standard with reasonable freeboard is already generally applied by Council within the city. • Provision for climate change should also be included in the performance standard, something that was inadvertently omitted in the notified version. 	<p>allowance for climate change), plus 350mm <u>reasonable</u> freeboard for dwellings and dwelling units (including attached garages).</p>
S09 – Palmerston North City Council	S09.005	Section 10: Rule 10.6.1.8(d)	Support in part	<p>The Guidance Note under Rule 10.6.1.8 (d) refers to the lack of detention areas being the reason for the permeability requirement. However, the Stormwater Servicing Assessment notes that the permeability requirement stems from the network capacity and the sites location within the wider catchment. Concerns that detention is not an acceptable mitigation measure for this development area. Additional clarity is required to reinforce that detention is not a feasible option to achieve the onsite permeability.</p>	<p>Amend the guidance note to as follows:</p> <ul style="list-style-type: none"> • 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, <u>detention is not a feasible option to achieve the</u> 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.
S11 – Frances Holdings Limited	S11.020	Section 10: Rule 10.6.1.8(d)	Oppose	<p>Considers that the permeability standard is redundant and should therefore be deleted.</p>	<p>Delete Rule 10.6.1.8(d).</p>
S03 – Luke Hiscox	S03.001	Section 10: Rule 10.6.1.8(f) (inferred)	Support	<p>Supports residential use, but increase the height limits as high as possible.</p> <p>Housing is needed in Palmerston North, it's an appropriate place for higher buildings, and the rationale to lower some of them doesn't stand up.</p>	<p>3 stories across the whole area.</p>

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S05 – Brigid Holmes	S05.001	Section 10: Rule 10.6.1.8(f) (inferred)	Amend	Supportive of 3 story dwellings if developed by private developers/homeowners. No high density social housing. 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. Clarify the viewpoint in the high density / 3 story builds and if there is the potential to include social housing.	Retain 3 storey high dwellings, only if undertaken by private developers/homeowners.
S11 – Frances Holdings Limited	S11.021	Section 10: Rule 10.6.5.6	Oppose	Considers that the proposed non-complying rules relating to permeable surfaces are unjustified and should therefore be deleted.	Delete Rule 10.6.5.6.
S11 – Frances Holdings Limited	S11.022	Section 10: Rule 10.7.4.12	Support in part	Suggests amending the regime for non-residential activities to reflect proposed Policy 15.5, with this based on a restricted discretionary consent where it is in the locations identified by an improved Policy 16.3 and discretionary consent elsewhere.	Amend the regime for non-residential activities to reflect Policy 15.5.
S13 – Health New Zealand Te Whatu Ora	S13.001	Section 32 – Appendix F: Contamination Report – PSI & Appendix G: Contamination Report - DSI	Support in part	Has an interest in contaminated land on which housing developments are proposed, and 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.	Consider Te Whatu Ora as an affected party when development and associated site remediation plans are assessed by Council.
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.011	Section 32 – Appendix F: Contamination Report – PSI & Appendix G: Contamination Report - DSI	Support	Notes that land within the plan change area is expected to qualify as 'priority contaminated land' as defined in Policy HAZ-WC-P7 Identification of priority contaminated land* in the Horizons One Plan Regional Policy Statement, particularly as the a Detailed Site Investigation prepared for the area has confirmed that a number of activities included in the MfE HAIL are currently, or have been historically, undertaken across the site.	Retain the proposed 'note to plan users' underneath Rule 7.6.2.6.
S19 – Rosemary Watson	S19.0011	Section 32 – Appendix F: Contamination Report – PSI & Appendix G:	Amend	Site neighbours and adjacent public areas are not considered in either Contamination Report, which is a serious omission.	Include near-neighbours and users of the River Park near the RRA in the conceptual site model and implement contamination management strategies.

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		Contamination Report - DSI		The unusual nature of this industrial area warrants site-wide overview/organisation to ensure overall co-ordination of contamination management activities. There should be higher level of scrutiny to ensure compliance with NES standards.	Local authorities to implement site-wide overseeing of contamination-related issues throughout the RRA construction period.
S22 – Horizons Regional Council	S22.011	Section 32 – Appendix G: Detailed Site Investigation	Support	Outlines that Lot 1 DP 74592 is listed on Horizons' database as a potentially contaminated site associated with hazardous substances.	<p>Adhere to the advice in the DSI, including obtaining the relevant resource consents with Horizons; and as outlined below:</p> <ul style="list-style-type: none"> • 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."
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.010	Section 32 – Appendix I: Liquefaction Report	Support	Supports a geotechnical investigation being undertaken to assess the potential for liquefaction risk within the plan change area.	No specific change requested.

Submitter	Submission Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.003	Section 32 – Appendix J: Stormwater Servicing Report	Support in part	<p>Identifies within the Stormwater Servicing Assessment Report identifies that the existing stormwater network is insufficient for current industrial use and is "undersized for the catchment in general." Consequently, network upgrades are needed to accommodate future residential development, along with restrictions on impervious areas.</p> <p>A major upgrade identified is replacement of the stormwater outlet pipe to the Manawatū Awa, which will necessitate consent from Horizons Regional Council (HRC). HRC has indicated it will only consider this upgrade if it provides benefits to the wider catchment, that delays are expected due to the need for funding, consents, design, and construction.</p> <p>The assessment recommends setting impervious area thresholds based on development timing, with a requirement for 45% net site area before upgrades and 30% after the river outlet upgrade. Additionally, the Roxburgh North stormwater main must be upgraded to at least DN300 before any residential development can occur. While Rule R10.6.1.8 reflects changes in impervious surface requirements, it lacks clarity and does not mention the necessary upgrade of the Roxburgh North stormwater main.</p> <p>Figure 7 suggests that this upgrade is budgeted in the Long-Term Plan. However, the funding section of the assessment does not reference this 'stage 1' work or provide details about Appendix C 'LTP Programme and cost estimate breakdown', thereby making it impossible to determine whether the Roxburgh North upgrade has been budgeted for, will be delivered, or when it will occur.</p>	<ol style="list-style-type: none"> 1. Publish the Stormwater Servicing Assessment Appendices referred to in the notified documents. 2. Confirm that the upgrade to the Roxburgh North stormwater main has allocated Council funding and will be delivered before residential development occurs; or Amend the proposed rules if residential development occurs in advance of this upgrade. 3. Amend Rule R10.6.1.8 to specify that the upgrade must be in place prior to the construction of houses and, if not in place, that construction of dwellings becomes a non-complying activity under Rule R10.6.5.6.
S16 - Tānenuiarangi Manawatū Charitable Trust,	S16.005	Section 32 – Appendix J: Stormwater Servicing Report	Support in part	Concerned that use of such methods as pervious pavers or similar technologies may be ineffective in achieving sufficient infiltration over the long term. These technologies can have a fairly high failure rate, and therefore a shorter	Amend the methods sub-section in Section 10 to allow the council to undertake regular inspections of pervious pavements within the plan

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Te Ao Turoa Environmental Centre				<p>life span than other types of stormwater mitigation, and are very susceptible to clogging from sediments, which then causes failure of the device.</p> <p>Consequently, the effectiveness of the proposed provisions will rely on future homeowners to maintain pervious paving in perpetuity and rely on consent notices to enforce this, noting that no provisions are proposed to address compliance monitoring of pervious paving within the plan change area.</p> <p>The extent to which 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 is also questionable.</p>	<p>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.</p> <p>Or, require greater levels of stormwater treatment.</p>
S19 – Rosemary Watson	S19.009	Section 32 Evaluation Report and Section 32 Report - Appendix J: Stormwater Servicing Report	Amend	Ensure the modelling of changes of overall site pervious percentage with development is correct, and the timing of "peak site impermeability" during development is matched by stormwater installations/upgrades.	Investigate discrepancies in Section 32 Evaluation Report, between summary of the Stormwater Assessment consultant report, and the consultant report itself.
S11 – Frances Holdings Limited	S11.004	Section 32 Report – Appendix D: Transportation Assessment	Support in part	The submitter notes 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. The submitter has measured that road width at 14m, which is 1.2 m wider than Roxburgh Crescent.	No specific change requested.
S19 – Rosemary Watson	S19.0010	Section 32 Report – Appendix D: Transportation Assessment	Amend	Ensure safety for pedestrians and cyclists using the accessway(s) between the RRA and Roxburgh Crescent.	<p>Investigate the 'not safe' claim made by their 'major Plan Change development partner' from time between the draft and final Transport Assessment reports.</p> <p>Council to establish the nature of the safety issue, and whether it was</p>

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					successfully mitigated before the final report.
S11 – Frances Holdings Limited	S11.001	Section 32 Report – Appendix J: Stormwater Servicing Assessment	Support in part	<p>Section 5.3.1 of the Section 32 Evaluation Report misrepresents the Stormwater Servicing Assessment undertaken by GHD Ltd, noting that as the Plan Change area is currently 100% impervious there will not be increased flows generated from the site as a consequence of redevelopment. Although the assessment states that an increase in permeability will improve service levels the feasibility of this is doubtful given the existing ground conditions and will also be restrictive in terms of residential design opportunities for the area.</p> <p>Additionally, it is noted that there may be other acceptable solutions in terms of water sensitive design other than permeable surfaces and on-site attenuation.</p>	<ol style="list-style-type: none"> 1. Delete the permeability standards in Rule 10.6.1.8 (d). 2. Either delete Policies 17.2, 17.3 and 17.4 or amended to reflect the points raised in the submission
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.008	<ul style="list-style-type: none"> • Section 7 - Policy 11.6, Rule R7.6.2.6(c) • Section 10 - Objective 16, Policy 16.2 • Objective 11 - Policy 11.3, Structure Plan Map 7.10 • Section 7, Objective 11, Policy 11.2); • Structure Plan Map 7.10, Section 10, Rule 10.6.1.8, Rule 10.6.3.3 Height Recession Plane 	Support in part	<p>Considers that Plan Change E should create an urban environment that enables:</p> <ul style="list-style-type: none"> • Māori communities to provide for their social, economic, and cultural wellbeing, as well as their health and safety, both now and in the future. • A variety of homes that cater to Māori communities' needs, being accessible, resilient, and enabling the expression of cultural traditions and norms. <p>Notes that Policy 9 of the NPS-UD 2020 requires the Council to involve Rangitāne in preparing Plan Change E, undertake effective consultation, and consider their values and aspirations for urban development. Further states that if Rangitāne wish to be involved in decision-making on consents issued under the plan change provisions, the Council must provide opportunities for this involvement, particularly where these consents could impact sites of significance and culturally significant issues.</p>	<p>Retain the following, subject to any amendments to improve clarity and certainty:</p> <ul style="list-style-type: none"> • The requirement to provide a range of housing choices and densities (Section 7, Policy 11.6, Rule 7.6.2.6 (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); • Re-purposing the Council owned piece of land at 22 Roxburgh Crescent so that it can be used as a road reserve

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					<p>to provide parking, to support public access to the river (Objective 11, Policy 11.3, Structure Plan Map 7.10, Roding cross sections);</p> <ul style="list-style-type: none"> • 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, Rule 10.6.1.8, Rule 10.6.3.3 (xiv) Height Recession Plane.
S22 – Horizons Regional Council	S22.002	Section 7: Map 7.10 Structure Plan	Support in part	<p>Discourages any works within the designated stop bank zone, to minimise potential adverse effects on the stop bank's structural and functional integrity.</p> <p>Notes that a minimum clearance of 5m from the toe of the stop bank is required to facilitate site maintenance and repair activities.</p>	Amend the structure plan to include the stop bank and 8m inland buffer from landward toe of the stop bank, as a 'stop bank restricted area' (or words to that effect).
S22 – Horizons Regional Council	S22.003	Section 7: Map 7.10 Structure Plan	Support	<p>The structure plan outlines a 'no build zone' related to the stormwater easement and the inclusion is supported.</p> <p>Notes One Plan rule LF-AWBD-R68 requires resource consent for certain activities within 8m inland of the landward toe of a stop bank.</p>	Retain the 'no build zone' in the structure plan.
S01 – Sean Mongahan	S01.001	Section 7: Objective 11	Oppose	As the city grows the quality of life diminishes as the city becomes noisier, busier and harder to get around and the environment degrades. The city should look at some of the	Investigate ways to degrow to improve the quality of life and of the environment.

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				clever and prosperous ways to degrow to improve the quality of life and of the environment.	
S16 - Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environmental Centre	S16.013	<ul style="list-style-type: none"> Section 7: Objective 11, Map 7.10 Section 10: Objective 16 	Support in part	Wishes to see the design of the built environment, including public and community spaces, reflect and celebrate the stories and identity of Rangitāne.	<p>Acknowledge and promote in Objectives 11 and 16 and related policies opportunities to celebrate Rangitāne cultural norms and traditions in the Roxburgh Residential Area, including:</p> <ul style="list-style-type: none"> 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. <p>Retain the proposed Structure Plan in Map 7.10, as notified.</p>
S11 – Frances Holdings Limited	S11.012	Section 7: Policy 11.1	Support in part	Considers that Policy 1.1 is better suited to an Objective, with associated subsections (b)(c) and (d) moved into the policies.	Amend Policy 11.1 to Objective 11 and consequentially move subsections (b)(c) and (d) to the policies.
S11 – Frances Holdings Limited	S11.008	Section 7: Policy 11.2 and Map 7.10 Structure Plan	Support in part	The proposed Structure Plan is considered overly prescriptive and gives no room for future flexibility. As it dictates 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.	<ul style="list-style-type: none"> Delete the proposed pedestrian and cycle access to Ruahine Street Delete the on street right angle parking on the Road D cross section and replace with parallel parking. Enable the use of Right of Ways or cul-de-sacs if better outcomes are achieved. Enable the Structure Plan tp be easily amended.

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					<ul style="list-style-type: none"> Relocate the existing stormwater pipe in the no build area, as shown on the structure plan, to the centre road. Consequentially amend Policy 11.2 by adding the following: <u>“unless a better design outcome is achieved.”</u>
S11 – Frances Holdings Limited	S11.013	Section 7: Policy 11.4	Support in part	Concerned that Policy 11.4 includes methods that should be relocated to the Methods Section.	Relocate methods in Policy 11.4 to the Methods Section.
S11 – Frances Holdings Limited	S11.014	Section 7: Policy 11.5	Oppose	Opposed in relation to pervious surfaces for the reasons outlined in submission point S11.001, noting further that it is a Method not a Policy.	No specific change requested.
S11 – Frances Holdings Limited	S11.015	Section 7: Policy 11.7	Oppose	Opposed in relation to on site permeability for the reasons outlined in submission point S11.001.	No specific change requested.
S09 – Palmerston North City Council	S09.003	Section 7: Policy 17.3	Support in part	Policy 17.3 has been included to provide guidance for consenting where permeability performance standards are not met. Based on the Stormwater Servicing Assessment of the area the subject of the proposed plan change, the network is already at capacity and cannot accommodate additional flow. Consequently, attenuating the flow will not mitigate the effects of the increase in impervious area proposed and this needs to be reflected in the policy.	Amend Policy 17.3 as follows 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.
S11 – Frances Holdings Limited	S11.016	Section 7: Rule 7.6.2.6	Oppose	Considers the R7.6.2.6 second bullet R7.6.2.6 regarding general accordance with the Structure Plan is not a matter of discretion and should be deleted.	Delete bullet point two in Rule 7.6.2.6.
S09 – Palmerston North City Council	S09.002	Section 7: Rule 7.6.2.6(d), Map 7.10A, Map 7.10B	Support in part	Rule 7.6.2.6 d)(iii) provides a specific measurement for stormwater treatment, however is not appropriately qualified. Based on the Stormwater Servicing Assessment of the area subject to the proposed plan change, the 1 m ² of treatment per 270 m ² of contributing area is based on the use of a Filterra System, which is a rapid stormwater filtration device.	Amend Rule 7.6.2.6(d)(ii) Road corridor as follows: <ul style="list-style-type: none"> How water sensitive design elements have been incorporated to manage stormwater quantity based on one (1) square metre of <u>rapid stormwater biofiltration pit</u>

Submitter	Submission Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested
				<p>By not appropriately quantifying the need for a rapid stormwater filtration device within the provisions there is potential that alternative treatment devices could be used that are significantly undersized, thereby resulting in poor outcomes and not meeting the intended objectives.</p> <p>Additionally, the cross-sections provided in Maps 7.10A and 7.10B reference a “biofiltration stormwater pit to service 270m² road reserve area”. The metric given is specific to a Filterra Tree Pit, or similar rapid stormwater biofiltration device. Consequently, the reference needs to be modified to either include the word “rapid”, or remove “to service 270m² road reserve area”.</p>	<p>being provided per contributing catchment area of 270m².</p> <p>Amend reference to the stormwater treatment device on Maps 7.10A and 7.10B as follows:</p> <ul style="list-style-type: none"> • <u>Rapid</u> biofiltration stormwater pit to service 270m² road reserve area.

Part II – Submitter Address List & Copies of Original Submissions

Submitter Address List

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