



PROPOSED PLAN CHANGE E: Roxburgh Crescent Residential Area

FORM 6 UNDER THE RESOURCE MANAGEMENT ACT 1991

FURTHER SUBMISSION TO

PALMERSTON NORTH CITY COUNCIL
PRIVATE BAG 11034
PALMERSTON NORTH 4410

ATTENTION: THE GOVERNANCE TEAM

FURTHER 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

OUR SUBMISSION:

This is a further submission in support of and in opposition to submissions on Proposed Plan Change E: Roxburgh Residential Area to the Operative Palmerston North City Council District Plan.

Te Ao Turoa Environmental Centre (TATEC) contributes to upholding kaitiakitanga on behalf of Rangitāne o Manawatū iwi (Rangitāne). Rangitāne have an interest in the proposal that is greater than the interest of the general public. Rangitāne are mana whenua and have cultural and customary connections encompassing 440,000 hectares of the Manawatū plains, divided by the Manawatū River and its tributaries. Rangitāne rohe includes the city of Te Papaioea (Palmerston North) and the area subject to the proposal.

The following table outlines:

- the submissions Rangitāne o Manawatū support and oppose
- the particular parts of the submissions which are supported or opposed
- the reasons for support or opposition
- the whole/parts of the submissions Rangitāne seek to be allowed/disallowed.

Rangitāne wish to be heard in support of our further submission.

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

This further submission has been sent to Palmerston North City Council by email to submission@pncc.govt.nz

Danielle Harris O.N.Z.M, LLB, PGDipBusAdmin on behalf of Rangitāne o Manawatū

Chief Executive Officer, Tanenuiarangi Manawatū Incorporated

17 December 2024

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Electronic address for service of person making further submission:

raythe@rangitaane.iwi.nz

Telephone:

06 353 1881

Postal address:

PO Box 1341, Palmerston North 4412

Contact person:

Danielle Harris, Chief Executive Officer,
Tanenuiarangi Manawatū Incorporated

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Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
S09 – Palmerston North City	S09.001.	<p>Rangitāne support the part of Palmerston North City Council’s submission requesting to add a new policy under Objective 15 and a performance standard under Rule 10.6.1.8 controlling copper and zinc building materials.</p> <p>Rangitāne oppose the new policy wording.</p>	<p>Avoiding these contaminants being entrained in stormwater is important for avoiding any further degradation of water quality and mauri in the Manawatū River.</p> <p>The new policy should say ‘avoided’ rather than ‘mitigated’. Building materials that are not sealed or otherwise finished to prevent water runoff which contains</p>	<p>Disallow ‘mitigated’ and use ‘avoided’.</p> <p>Allow the rest of this part of the submission.</p>

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Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
			copper or zinc, should not be allowed. The policy wording should signal a strong avoidance approach.	
S09 – Palmerston North City Council	S09.002.	Rangitāne support the part of Palmerston North City Council’s submission seeking amendments to stormwater treatment references in rule 7.6.2.6(d).	It is important that stormwater treatment references are accurate, so that the rule framework is effective in avoiding any further degradation of mauri in the Manawatū River and its tributaries through stormwater discharges.	Allow the amendment as sought in the original submission.
S09 – Palmerston North City Council	S09.003.	Rangitāne support the part of Palmerston North City Council’s submission	It is important that the volume of stormwater entering the stormwater network is not increased through redevelopment	Allow the amendment as sought in the original submission.

FS 1-6

Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
		seeking amendments to Policy 17.3.	of the Roxburgh Residential Area, to protect the mauri of the Manawatū River and its tributaries.	
S09 – Palmerston North City Council	S09.004.	<p>Rangitāne oppose the part of Palmerston North City Council’s submission seeking amendments to minimum floor levels and the annual exceedance probability flood event in performance standard 10.6.1.8(b).</p> <p>Rangitāne support amendments to performance standard 10.6.1.8(b) to include</p>	<p>As per our original submission Rangitāne are concerned about the risk of a stop bank breach; a 15% chance of failure over a period of 100 years is not insignificant.</p> <p>Amendments sought by Palmerston North City Council have the effect of reducing the level of protection afforded to homes in the Roxburgh Residential Area.</p>	<p>Allow addition of text to allow for climate change in flood and stormwater inundation levels.</p> <p>Disallow the requested changes to the minimum floor levels and annual exceedance probability flood event.</p>

FS 1-7

Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
		<p>'allowance for climate change' in the performance standard text.</p>	<p>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 <i>HAZ-NH-P10 Development on land prone to flooding</i>. However, whilst a breach event may be a low probability it will have high consequences and should be adequately planned for. Rangitāne</p>	

FS 1-8

Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
			consider a precautionary approach should be adopted, and a higher level of protection afforded.	
S09 – Palmerston North City Council	S09.005.	Rangitāne support the part of Palmerston North City Council’s submission seeking amendments to the guidance note under R10.6.1.8(d)	The District Plan should include accurate information for plan users.	Allow the amendment as sought in the original submission.
S11 – Frances Holdings Limited	S11.001.	Rangitāne oppose the part of Frances Holding Limited’s submission seeking deletion of the permeability standards under Rule 10.6.1.8(d) and deletion or	The mauri of the Manawatū River must be protected and improved, and Rangitāne o Manawatū position on Te Mana o te Wai upheld. It is important that the District Plan drives improvements to	Disallow the relief sought in the submission point.

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Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
		<p>amendments to policies 17.2, 17.3 and 17.4.</p>	<p>stormwater quantity and quality from the Roxburgh Crescent Residential Area as the land is redeveloped. Removal of the stormwater flooding policy and permeability policies and standards is opposed as doing so will not appropriately manage hazard risk, stormwater discharges, nor will it drive improved outcomes in stormwater volumes and quality as set out in sections 3.2 and 3.3 of the Stormwater Servicing Assessment.</p>	

FS 1-10

Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
S11 – Frances Holdings Limited	S11.019.	Rangitāne oppose the part of Frances Holding Limited’s submission seeking deletion of policy 17.3 on the basis ‘that neither permeability standards nor attenuation are required given the commitment to the new outfall infrastructure’	The timing of the upgrade is not certain. Permeability and retention standards are required to drive improved stormwater outcomes for the Manawatū River.	Disallow the relief sought in the submission point.
S11 – Frances Holding Limited	S11.020.	Rangitāne oppose the part of Frances Holding Limited’s submission seeking deletion of permeability standards under rule 10.6.1.8(d).	The permeability standard is not redundant. Rangitāne are seeking improvements in stormwater quality and quantity in the Roxburgh Residential Area to improve mauri and water	Disallow the relief sought in the submission point.

FS 1-11

Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
			<p>quality in the Manawatū awa. Deleting the permeability standard will result in the continued degradation of mauri and maintain the status quo, which has resulted in degraded water quality, disruption of our cultural connections to the awa and ability to gather mahinga kai.</p>	
S11 – Frances Holding Limited	S11.021.	Rangitāne oppose the part of Frances Holding Limited’s submission seeking deletion of Rule 10.6.5.6.	A non-complying activity status for permeable surfaces that do not comply with permeable surface standards is appropriate; section 2.2.1 of the Stormwater	Disallow the relief sought in the submission point.

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Name of original submitter and submission number	Submission number point	The particular parts of the submission Rangitāne support/oppose are:	The reasons for Rangitāne support/opposition are:	Rangitāne seek that the whole (or part) of the submission be:
			Servicing Assessment clearly establishes the capacity constraints which need to be managed.	
S22 – Horizons Regional Council	S22.002.	Rangitāne support Horizons Regional Council’s submission seeking amendments to 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).	It is important that the integrity of existing flood management structures are maintained and residential development is appropriately setback from the Manawatū River.	Allow the relief sought in the submission point.

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PALMERSTON NORTH CITY DISTRICT PLAN

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

Pursuant to Clause 8 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 further submission on Proposed Plan Change E to the Palmerston North City District Plan: Roxburgh Residential Area.

Frances Holdings Ltd is the largest property owner within the Plan Change area and, therefore, is a party that has an interest in the proposal that is greater than the interest the general public has.

Frances Holdings further submits to the following submissions.

1. S06 Edrei Valath

Oppose

All parts of the submission are opposed.

The submitter seeks to slow down and reconsider the scale and pace of the project due pressure on schools, small businesses, shops, effects on natural landscape, and traffic. The expert assessments do not support these concerns and there will be less disruption if the area transitions from industrial to residential as fast as the market will permit.

The further submitter seeks that the whole submission be disallowed.

2. S22 Horizons Regional Council

Oppose in part

The parts of the submission that are opposed are:

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S22.008 General Stormwater and flooding.

The need for additional on-site mitigation strategies is opposed and is addressed in the submitter's primary submission. Horizons supports the no build zone shown on the structure plan which is to protect the existing stormwater outfall through the stop bank. However, this is to be replaced by a new larger stormwater outfall as part of this Plan Change. The "No Build Area" shown on the Structure Plan is, therefore, temporary until such time as the new outfall is constructed. The Structure Plan should be annotated to recognise this and to this extent this submission is opposed.

Horizons submission expresses support for Plan Change E. The submission does not expressly comment on the proposed new stormwater outfall. Given this, support for this key proposal is inferred, and to that extent, is supported in this further submission. However, clarity on this should be sought when submissions are heard.

S22.010 General Stormwater and flooding.

This submission is opposed because there are no wastewater land application areas in the vicinity.

The further submitter seeks that the above submission points be allowed, disallowed and clarified as detailed above.

3. S19 Rosemary Watson

Oppose in part

The parts of the submission that are opposed are:

S19.0012 General - Noise.

The submitter is seeking additional noise standards for construction activities. These are not required because it is standard practice to impose construction noise related consent conditions at the time of subdivision consent.

S19.003 General – Rule 10.6.1.8.

This submission seeks to limit buildings adjacent to Tilbury Avenue boundaries to a single storey. This is opposed to ensure there is a reasonable yield of housing from the Roxburgh Residential Area to contribute to a shortage of short and medium term supply.

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S19.003 General – Rule 10.6.1.8.

This submission seeks to limit building height to 9 m adjacent to the river front. Three storey buildings in this location provide an opportunity to engage with the river corridor and increase density and yield with medium density residential development.

The further submitter seeks that the above submission points be disallowed.

4. S09 Palmerston North City Council

Support in part

The parts of the submission that are supported are:

S09-002 Rule 7.6.2.6(d)

This submission seeks changes to the stormwater treatment standard to either qualify the metric used in the rule as being specific to the Filterra system or removing the metric and making the rule more generic. This further submission supports the second option of making the rule more generic so that alternatives to Filterra can be employed. It is also noted that this submission is not consistent with the Section 32 report which specifically seeks to limit the treatment device to Filterra which the submitter opposes.

The further submitter seeks that the above submission point be allowed as specified.

5. S17 Rowan Bell

Oppose in part

The parts of the submission that are opposed are:

S17.001 Rule 10.6.1.8 (f).

This submission seeks to limit building height to 9 m adjacent to the river front. Three storey buildings in this location provide an opportunity to engage with the river corridor and increase density and yield with medium density residential development.

The further submitter seeks that the above submission point be disallowed.

6. S18 Doug Kidd

Oppose in part

The parts of the submission that are opposed are:

S18.002 Rule 10.6.1.8 (f).

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This submission seeks to limit building height to 9 m adjacent to the river front. Three storey buildings in this location provide an opportunity to engage with the river corridor and increase density and yield with medium density residential development.

The further submitter seeks that the above submission point be disallowed.

7. S20 Linda Bell

Oppose in part

The parts of the submission that are opposed are:

S20.001 Rule 10.6.1.8 (f).

This submission seeks to limit building height to 9 m adjacent to the river front. Three storey buildings in this location provide an opportunity to engage with the river corridor and increase density and yield with medium density residential development.

The further submitter seeks that the above submission point be disallowed.

8. S21 Rebecca Hambleton

Oppose in part

The parts of the submission that are opposed are:

S21.001 Rule 10.6.1.8 (f).

This submission seeks to limit building height to a single storey except along the riverfront. Two and three storey buildings in this location provide an opportunity to engage with the river corridor and increase density and yield with medium density residential development.

The further submitter seeks that the above submission point be disallowed.

9. S23 Jackie Carr

Oppose in part

The parts of the submission that are opposed are:

S23.001 Rule 10.6.1.8 (f).

This submission seeks to limit building height to 9 m adjacent to the river front. Three storey buildings in this location provide an opportunity to engage with the river corridor and increase density and yield with medium density residential development.

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S23.002 General

This submission also opposes the density of development to be enabled due the value of nearby recreation reserve and planted native trees. This is opposed because the reserve will provide recreational amenity for the Roxburgh Residential Area and neither the reserve nor the native trees on the reserve are under threat from this Plan Change.

The further submitter seeks that the above submission point be disallowed.

The submitter wishes to be heard in support of these further submission.

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

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



..... **Date: 18 December 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

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From: Doug Kidd <dkidd@xtra.co.nz>
Sent: Thursday, 19 December 2024 12:38 pm
To: Submission
Subject: Proposed Plan Change E: Roxburgh Residential Area

From:
Rosemary Watson,
27 Tilbury Avenue,
Hokowhitu,
Palmerston North 4410.
dkidd@xtra.co.nz
(06) 3585365

This e-mail is my further submission on the Proposed Plan Change E: Roxburgh Residential Area.

I would like to speak to Council / the independent decision panel in support of my further submission.

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

I am a person who has an interest in the proposal that is greater than the interest the general public has.

The house I have owned and lived in for 38 years (address above) is directly adjacent to the proposed Roxburgh Residential Area.

I walk and forage regularly in Waterloo Park Reserve.

I walk and forage regularly in the land which is the subject of the sale from Horizons Regional Council to the majority landowner of the proposed RRA site.

I walk regularly along the stopbank, and in the Manawau River Park, next to the proposed RRA.

The official submission form asks about 'allow'ing or 'disallow'ing each submission point raised, and the reason(s) for the relevant stance.

Despite my queries about this aspect of the form to PNCC planchange staff, and the replies from them, I am still unsure of the relevance/general rationale behind these questions.

I understand that all original submissions supposedly have the same weight and are presented to the 'independent decision panel' anyway, along with the summary of those submissions.

I understand also that all further submission points are also presented to the panel, and that it is the panel which ultimately decides on these points.

I see that the reporting planning officer who makes the summary of further submissions seems to have the power to make recommendations on those submissions to the decision panel.

So, 'allow' or 'disallow' presumably relates to a request to the planning officer to make that relevant recommendation to the decision panel?

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It would seem to be not the true intent of the question, and also potentially "vexatious", for a submitter to 'disallow' another's submission just because they oppose it. Every submitter is entitled to their own viewpoint.

And a member of the public such as myself often "does not have sufficient specialised knowledge or skill to give expert advice", only considered opinion, which is still valid.

So, please note, my answers to these questions in respect of all original submissions/points of submissions are the same, i.e.:

Allow/disallow?: Allow

I seek that the whole (or described part) of the submission be allowed because I am a fair-minded person and respect the time and effort that all submitters took to engage with the required process; and believe that all points of view are worthy of consideration by the 'independent decision panel', so that the best possible outcomes for the site, the immediate neighbourhood, Hokowhitu and the city can be achieved.

My other comments on original submissions/submission points are below:

Submitter / Submission point number: Sean Monaghan S01 / S01.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Submitter stance on District Plan Section 7 Objective 11 which states "...ensure that the subdivision within the Roxburgh Residential Area proceeds...".

Reason(s): In a world of finite resources I do not consider 'growth' to be the only answer to economic prosperity and community well-being, and I personally do not want to see Palmerston North's "small city benefits" being lost to its "big city ambition". I do not want to live in a "big city" with all its big problems, and I'm all for living within one's means and simplifying life. However, whilst PNCC is mandated by central government to provide housing under the NPSUD, it seems logical to use this anomalous industrial block of land, already surrounded by a residential area, for that purpose, providing that the development is suitably matched to its surroundings and available infrastructure.

Submitter / Submission point number: Sophie Boulter S02 / S02.001

Support/Oppose?: Support

Which part(s)?: Entire submission re schooling zoning/considerations

Reason(s): There is nothing specific apparent in PCE public consultation/notification documents re the effects on local schools and school zoning of increased numbers of school-age children in the area due to the new development, just that the "RRA... is close to a primary school". The FDS only says that no new schools will be required for the projected population growth in the next 30 years, and that "The Ministry of Education will continue to carefully monitor growth and other trends which may impact the school network." Is that enough reason for the lack of consideration of specific schooling requirements for the proposed new community here?

Perhaps, like me, the people who prepared the Urban Design Report do not have school-age children and simply 'forgot' to consider this aspect further? It does seem like a serious omission in view of the current popularity of Winchester School. Another impact on Winchester School which likely also needs to be addressed is the future safety of its pupils due to increased traffic flows in the area if the development goes ahead.

Submitter / Submission point number: Luke Hiscox S03 / S03.001

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Support/Oppose?: Oppose

Which part(s)?: Three storey heights across the whole area

Reason(s): The submitter contends that "It's a gorgeous area to live", but it would no longer be so for current residents and Manawatu River Park users if the existing residential character and open space were to be dominated by an incongruous 'lump' of three-storey buildings. Yes, the city needs more homes, but please have concern too for those in adjacent dwellings; blend the new homes into the existing neighbourhood by transitioning heights gradually away from existing residential properties. Re infrastructure requirements, these would have to be re-addressed if three-storey multi-unit buildings were across the whole site to maximise the actual number of new homes as per the submitter's suggestion. This might particularly apply to wastewater and to vehicle numbers on site and parking considerations/road design.

Submitter / Submission point number: Jack McKenzie S04 / S04.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Buildings heights in development as per Council proposal

Reason(s): I agree with the submitter that more than one storey could make better use of the land, but the planned section sizes are very small and so the proposed housing would be fairly high density anyway. I do not agree fully with the Council's proposal specifics, as per my original submission.

Submitter / Submission point number: Brigid Holmes S05 / S05.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Three storey heights, building density, presence of social housing

Reason(s): I had assumed that this proposed development was to be completely private with no 'social housing', but agree with the submitter that the potential for this needs to be clarified, and also support having no high density 'social housing' on the RRA site. However, as per my original submission, I oppose three storey buildings anywhere on the site even if privately owned.

Submitter: Edrei Valath S06

Submission point number: S06.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s): Traffic and safety concerns

Reason(s): I, like the submitter, would anticipate increased car traffic volumes and thus increased safety concerns, especially around Winchester School and the Ruahine Street/Manawatu Street/Pahiatua Street junction, as a result of the proposed development. However, this is likely offset somewhat by the reduction in traffic, notably heavy vehicle movements, since Roxburgh Crescent ceased to be the main Higgins depot/office. Heavy vehicle traffic might though be expected to increase again 'temporarily' during the construction phase. The Transportation Report does not indicate any particular issues arising from the currently proposed density, and the increased traffic flows of several hundred vehicles a day are predicted to remain well within the capacity of the local roading network. (The local congestion issues we experience currently, and the potential for those to increase in future, are thus also inferred to be well within the capacity of the local population to bear...) So hopefully the consultants are correct. We shall see... I agree with the submitter's suggestion of a gradual approach to, and consideration of the scale of, the site development, and appropriate traffic management if necessary; so that local traffic can adapt to potential changes.

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Submission point number: S06.002

Support/Oppose?: Support

Which part(s)?: Strain on local education resources

Reason(s): As per my reasoning for S02.001 above. The submitter's concerns include Hokowhitu School as well as Winchester School, and are not only about overstretching capacity *per se*, but also about the consequent negative effects on education quality. Again, the phased/scaled approach to proposed RRA development sounds sensible.

Submission point number: S06.003

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Lack of recreational and community facilities

Reason(s): Taken as a broad brush statement re recreational facilities, I do not agree with the submitter's contention that they are lacking. The Manawatu River Park could hardly be closer, Waterloo Park is nearby, and the grounds of Winchester School immediately opposite can be used out of school hours. But the submitter refers particularly to families with young children, so maybe is thinking more specifically about children's playgrounds. Whilst there is one in Waterloo Park, another in Crewe Crescent, and a third on Franklin Avenue, all relatively short distances away, there is currently nothing like that included for the proposed RRA, and this does appear to be an omission when so many homes on such small sections with little play space are planned. Perhaps, not forgetting the safety risks of nearby vehicle activity, some thought should be given to using part of any central open space area in the development for a children's playground; if not immediately, then allowing for such in the future, a phased approach again. Re other unspecified "community facilities", the PCE area has long been recognised as a 'bespoke' development, lying outside the 800 m maximum distance from a shopping centre criterion for medium density housing, and there has been no provision made on the site for community garden space, and I agree that in these respects the development does appear to be lacking.

Submission point number: S06.004

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Environmental impact on local reserves

Reason(s): From the description given, ("a natural space that residents from all over Palmerston North rely on for recreational activities and a connection to the outdoors") I infer that by 'local reserves' the submitter is referring here to the Manawatu River Park in the vicinity of the proposed development. I agree that there is the potential for high density building adjacent to this space to negatively affect the calming natural landscape environment. I further agree that increased usage of the area could lead to the various undesirable outcomes noted. However since the vision for the City River framework is to promote the River Park as a destination with increasing numbers of users, it is unlikely that its increased usage by residents of the proposed RRA will be viewed *per se* as a valid reason to oppose the scale of the development. Instead, the city must plan for the negative effects of increased users of the River Park, and act to mitigate those effects accordingly: a gradual development of the proposed site, as the submitters suggests, could be a factor in those plans.

Submission point number: S06.005

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Strain on local businesses and shops

Reason(s): Unlike the submitter, I think that most local businesses would welcome more customers sooner rather than later, and would willingly adapt to suit, where possible. However since the proposed RRA falls outside PNCC's stated 'walkable distance' to a shopping centre (as

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considered for medium density development) parking availability/infrastructure around Hokowhitu village and Terrace End shops may be negatively affected, so again, this needs to be taken into consideration by the development planners.

Further comment - the submitter requests the consideration of a phased and possibly re-scaled approach to the development to address all the above points. Whilst acknowledging the call for new housing development to meet the current shortfall, there is also recognition of the need to simultaneously protect the local neighbourhood and environment, and to maintain community well-being and quality of life for existing residents. I could not agree more with these sentiments. It may well be that gradual development of the site is somewhat self-regulating due to site-specific issues such as restrictions on soil volume movement and the timing of stormwater servicing upgrade work. It may also be that section sales and availability of tradespeople etc. could influence the progress of the development. However it would be desirable to have a more planned approach to phased construction for the site than to rely on these factors.

Submitter / Submission point number: Patrick Henderson S07 / S07.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: First time buyer homes in development

Reason(s): I agree with including some 'entry-level homes' for first time buyers, but as part of the overall mix of housing choices in the proposed development. I don't however think it's an appropriate use of ratepayer funds for the Council to be involved in the onsale of any such properties, as the submitter suggests. Also, due to increased overall housing supply, there will presumably be some flow-on effects for first time buyers anyway, in terms of other properties becoming available as people move up the housing ladder into higher value homes in the new development.

Submitter / Submission point number: Robert Hodgson S08 / S08.001

Support/Oppose?: Support

Which part(s)?: Climate change and flooding concerns as related to the proposed development

Reason(s): Though this submission is without any specifics, I absolutely support it in terms of the need to plan (and then execute accordingly) all aspects of the proposed development for worst case contingencies of, and best resilience to, climate change and flooding risk. Be generous, not conservative, in the provision of adequate stormwater servicing/run-off mitigation and building integrity etc. if proceeding with this Plan Change, not just for the sake of the development and its new residents, but for the surrounding neighbourhood too.

Submitter / Submission number: Palmerston North City Council S09

Submission point number: S09.001

Support/Oppose?: Support

Which part(s)?: Zn and Cu run-off contamination avoidance

Reason(s): Protection of water ways and freshwater ecosystems, and maintenance of water quality. I can't comment on the technical details or other specifics. However I understand that copper and zinc are heavy metals and can be toxic in the environment. If using appropriate coating/sealing on construction materials to contain these metals helps prevent toxic effects downstream following run-off, then this has to be a good thing, and I support the inclusion of appropriate rules/policies for the Roxburgh Plan Change site as well as within the wider District Plan.

FS 3-6

Submission point number: S09.002

Support/Oppose?: Support

Which part(s)?: Stormwater treatment in roading design

Reason(s): The details are too technical for me, but since the proposed changes are intended to improve stormwater handling outcomes, then this has to be good for the proposed site and the surrounding neighbourhood.

Submission point number: S09.003

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Amend Policy 17.3 (re permeability limits and stormwater attenuation)

Reason(s): Unable to comment specifically as lacking in relevant technical knowledge. However I note the alternative suggestion presented by another highly involved submitter to delete this policy completely (S11.019). People, this is stormwater you are talking about; please, for all our sakes, make sure you get it right.

Submission point number: S09.004

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Floor level rule change

Reason(s): I'm not familiar with the wider legislation referenced here, and I am confused by the changes proposed. On one hand there appears to be a reduction in the flood protection offered by the suggested new wording, albeit to match rest of the city behind the higher level of protection of the stop bank. On the other hand, the new wording seeks to bring in provision for climate change. Have to trust the experts on this one I guess...

Submission point number: S09.005

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Amend R10.6.1.8(d) Permeable surfaces Guidance note

Reason(s): I'm not familiar with the technical details, so can't comment specifically. However I note the alternative suggestion presented by another highly involved submitter to delete this Rule completely (S11.020). People, this is stormwater you are talking about; please, for all our sakes, make sure you get it right. I just want to stress the importance of ensuring that all stormwater-related provisions are planned and actioned to include large 'safety margins'.

Submitter: Jason Temperley S10

Submission point number: S10.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Increase minimum lot size

Reason(s): Like the submitter, I am concerned about the overall density of the development and its 'fit' into the existing neighbourhood: I would prefer the development to be standard density housing to match its surrounds. I agree with the submitter about the need for sufficient private space on the section for gardening, outdoor living, recreation and other activities. The minimum 250 m² is definitely a very small size section, especially for a family home. Many such homes side by side, especially if two- or three-storeys, would definitely appear overcrowded and overwhelming, and I believe such a layout should be avoided. I wouldn't want to live on a section that small myself. However it is only a minimum, and hopefully if offering a range of housing choices, the proposed development would not only offer some smaller homes on those smaller sections, but would also offer a range of section sizes up to the maximum 500 m². I would be concerned that if the minimum section size were increased, without any other limiting provisions, there would also be increased likelihood of a move back towards more taller

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buildings over the site (as per pre-consultation levels), to achieve the 'desired' (not by me!) overall higher density outcomes of the Plan Change.

Submission point number: S10.002

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Stormwater easements/no-build zones

Reason(s): Absolutely I support all measures concerned with ensuring adequate stormwater servicing/mitigation on this site. The submitter notes the absence of stormwater easement/no build area(s) in the main Plan? Figure 1, however it appears that Fig 4 PCE Structure Plan (Section 32 Report 4.1.1), Map 7.10 Structure Plan in the proposed District Plan amendments, and Fig.1 Roxburgh Crescent Structure Plan in the Stormwater Assessment, all show one along the existing stormwater alignment to the river, and the Stormwater Assessment mentions it in section 2.2.1. Thus this point may be invalid, although there may be the need to amend and/or standardise the relevant diagram(s) in the supporting documentation.

Submitter: Frances Holdings Ltd. S11

Submission point number: S11.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Amendments to address Section 32 Stormwater summary and Stormwater Servicing Assesment discrepancies

Reason(s): This submitter has, like me (S19.009) recognised discrepancies relating to permeability between different parts of the literature relating to the proposed Plan Change, and suggests amendments to the site rules and policies accordingly. I agree that there does seem to be some confusion in this area which needs to be clarified. However the submitter accepts the 'currently 100% impervious' assumption for the overall site, which I queried in my own original submission, and still do. (I have no expertise here, just common sense from observation that grassed areas are not impervious and neither to a large extent are surfaces of gravel and stone, and these appear to make up a reasonable proportion of the current site.) Since some of the submitter's proposed amendments are apparently related to this, I believe the apparent confusion and any potentially incorrect modelling assumptions need to be addressed before these amendments are considered further.

Submission point number: S11.002

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Roading cross sections - Map 7.10 B parking on middle road

Reason(s): I have no opinion on most of the sub-points raised here as I have no relevant technical knowledge. Parking in the area near the new river entrance was however a submission subject which arose during the reserve land exchange process, in the context of ensuring that any exchange was like for like, i.e greenspace for greenspace, and any 'new' exchanged land would not be used for parking. The deliberations report produced at that time (Item 9, 15/11/23 PNCC Strategy and Finance Committee meeting agenda), like the WSP Transportation Report mentioned by the submitter, does not offer any assessment of specific car parking needs in this area, and I agree that this missing information may have been useful. It does however state "A cost of \$50000 is estimated to provide another 5 parks for Manawatu River Park users over and above the on-street parking provision that will be required to be provided by the developer on the street". This number of car parks seems minimal compared to the aspirations of the Council for visitors to access the Manawatu River Park at this location and for the enhancement of the river access. Why go to the effort of planning for and provisioning such a large open space, and going through the land exchange process to do so, for less than 5 cars of visitors at a time? The

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20.5 m road width contributes to improving sight lines to the river, and without the perpendicular parking incorporated in it, as per the Parks and Reserves Assessment, "there would be very limited on street parking available to support the river access". So, I don't agree with replacing the perpendicular parking with parallel parking and the presumed consequent narrower cross-section; especially when, if I understand correctly, the Council's own land (pt. 22 Roxburgh Crescent, S32 Report 2.1.2 Fig.2) is to be used for this car parking.

Submission point number: S11.004

Support/Oppose?: No opinion/comment

Submission point number: S11.006

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Increase maximum lot size to 600 m², amend relevant standards accordingly

Reason(s): If this resulted in slightly less density, as well as more sensible/logical subdivision into lots, then what's not to like? However I would have reservations if a greater proportion of multi-unit buildings were enabled/constructed as a result of this change. N.B. I believe any increase should also be included in R10.6.1.8c, but this not mentioned in the summarised submission point.

Submission point number: S11.007

Support/Oppose?: Support

Which part(s)?: Lot size ranges included in relevant standards 10.6.1.8 ciii) a) and b)

Reason(s): I agree that the current wording seems to cater only for lots of exactly the minimum and maximum permitted size, and that in reality there will be a range of lot sizes between these limits. Incorporating ranges of lot sizes into the rules makes them workable.

Submission point number: S11.008

-Which part(s)?: Degree of overall structure plan flexibility

Support/Oppose?: Neither fully support nor fully oppose

Reason(s): It does seem appropriate to have some degree of flexibility in the Structure Plan to allow for unforeseen contingencies, but after over 5 years of planning involving PNCC and the major landowners, it would be hoped that most of the design and layout issues etc. had already been addressed and agreed upon, and thus not 'too much' flexibility would be needed. I find it somewhat disappointing that this is apparently not the case. The main outstanding points of difference between the parties involved in the planning for the site, including those mentioned separately below, need to be resolved and agreed on before the potential approval of the Plan Change. If the site rules/layout are too flexible after the proposed Plan Change rezoning, then the end result may not be what was actually put forward for consultation, and thus may not meet the expectations and/or standards of certain interested parties.

-Which part(s)?: Delete proposed pedestrian/cycle access

Support/Oppose?: Oppose

Reason(s): I like the current inclusion of the pedestrian/cyclist route from the proposed site into Ruahine Street, and consider that it promotes/supports active transport options. It helps link the wider neighbourhood to the river, and the new subdivision to the existing residential area (a safer route for the kids to get an ice-cream from the dairy, a quicker link to the bus stops, or simply just another city-side walking option). I am somewhat surprised to see this point feature in the submission. At the time of the PNCC Council land exchange decision, it was stated in a Council Notice of Motion that the major landowner gave an indication of opposition to this accessway as part of their apparent response to the earlier PNCC Strategy and Finance Committee majority vote and recommendation against the exchange. This had a direct influence on the full Council vote, which turned over the previous Strategy and Finance Committee result,

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such that the land exchange proposal went ahead. So why is it still an issue now? Does the developer still have safety concerns, as previously implied in the Notice of Motion, which neither the Council nor the Transportation Report consultants are apparently aware of? Again, inclusion or otherwise of this access seems important enough to confirm before Plan Change approval.

-Which part(s)?: Delete right angle parking on centre road D

Support/Oppose?: Oppose

Reason(s): As per my response to point S11.002 above

-Which part(s)?: Enable RoWs and cul-de-sacs if better outcomes are achieved, amend Policy 11.2 accordingly

Support/Oppose?: Neither fully support nor fully oppose

Reason(s): Personally, I like cul-de-sacs and rights of way, for the privacy they offer, and the lack of through traffic. I grew up in one, have chosen to live in one now, and have also lived in other 'no through road' situations. Inclusion of cul-de-sacs in this development might help minimise the 'blocky' appearance of dense terrace-like rows of buildings in the current 'straight line' Structure Plan, and, where lot sizes are so small, potentially offer alternative play areas for children. I remember endless hours of fun playing in the bowl of a cul-de-sac with the other 'street kids'. From those viewpoints I support their use in the RRA site. But I think the definition of 'better outcomes' needs to be addressed. Better for whom?; better in what respect(s)? The Urban Design Report considers 4 different scenarios including one (Scenario 1) with cul-de-sacs, which was not the 'preferred' option (Scenario 4) for the site that now determines the current Structure Plan layout. Those preferring Scenario 4 might well have a different vision of what 'better outcomes' actually means, than those who apparently wish to reconsider different layout scenarios. This aspect of the development absolutely needs to be resolved before approval for the rezoning is given.

-Which part(s)?: Relocate stormwater outlet pipe to centre road

Support/Oppose?: Oppose

Reason(s): I can't see any specific advantages of doing this. If I'm interpreting Fig.3 in Section 2.1 of the Stormwater Assessment correctly, the current outlet of the stormwater system is not part of the below-minimum pipe size that needs upgrading *per se*. Leaving the current exit route in place, but as a publicly-owned no-build easement for maintenance access, as per the Council's preference (Section 2.2.1), would seem to be a sensible option, with the benefit that the land area concerned would presumably not be impervious and would contribute to the overall site permeable %. Moving the outlet pipe would presumably significantly increase stormwater servicing costs due to the new pipe installation required, not only up the centre road itself, but also in reconnecting any 'new' outlet pipe from the site river entrance to the river outfall, whether along the edge of the site to connect back with the existing network outlet (future access issues?), or going 'cross-country' under the stopbank and through the river park area. Also, aligning the outlet pipe under the centre road would create problems for river access and parking etc. when maintenance is required. But I understand (very basically) that on-site modelling for the proposed rezoning (if assumed to be correct) did demonstrate the need for an outfall upgrade: and furthermore that the site itself is only part of a wider network, and that Horizons would only consider such an upgrade if there were benefits to this wider catchment area: also that, as such, various options were explored, and the recommended one does involve duplication of other existing pipework on the proposed RRA site, as well as the outfall upgrade. So, from that respect, I guess, there will already be a lot of stormwater work happening, and any other changes on site might also be possible, pending Horizons input. However if the relocation does not offer any further advantages to the overall network than the current recommendation,

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then I would not want to see any additional ratepayer funds being involved to enable this. Surely more certainty on this aspect of stormwater provision and costs is required before the potential Plan Change is approved? It may influence availability and timing of funding, and thus the actual pattern and progression of planned development of the site.

Submission point number: S11.010

Support/Oppose?: Oppose

Which part(s)?: Exchange of reserve land prior to Plan Change approval

Reason(s): Simply, why might this be required? What benefits would this have for the overall development? The removal of the existing reserve and the 'new' central position of the 'exchanged' reserve land are already 'assumed' and included in the Structure Plan; this has been the situation for many years, and site planning has evolved around that. However, the Council's case for the land exchange is based on its view of 'wider community benefit' of a recreation reserve in the 'new' proposed position than of the reserve in its current position. What would happen if there were to be some as yet unforeseen reason(s) why PCE will not go ahead as predicted, but the reserve exchange did proceed prior to that? There would be a piece of Council-administered reserve land (under concrete) in an industrial zone with no public access, and there would be unnecessary loss of valued public greenspace area in Waterloo Park. This would not be 'wider community benefit', and neither would it be appropriate 'guardianship' of and regard for Crown land; and most ratepayers would surely not approve of either the premature exchange action by Council or the associated unnecessary legal costs. So, Council's application to DoC for the reserve land exchange was contingent upon the Plan Change going ahead, and this has been recognised since public notification of the exchange proposal, if not before. Consequently, DoC's decision on the exchange is that it only proceeds subject to approval of the Plan Change. Since this is part of a statutory process, I doubt that this can be changed even if it were deemed desirable to do so. Furthermore, the suggestion of executing/confirming the reserve exchange before the Plan Change is seemingly at odds with the submitter's other point (S11.008) desirous of more flexibility within the Structure Plan (post approval).

Submission point number: S11.012

Support/Oppose?: No opinion/comment

Submission point number: S11.013

Support/Oppose?: No opinion/comment

Submission point number: S11.014

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Pervious surfaces

Reason(s): See my response to S11.001 (above)

Submission point number: S11.015

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: On-site permeability

Reason(s): See my response to S11.001 (above)

Submission point number: S11.016

Support/Oppose?: Oppose

Which part(s): Delete clause re subdivision in accordance with the Structure Plan

Reason(s): I may be mistaken, but this seems again to be related to the extent of flexibility for the development to vary after the Plan change approval. See my response to S11.008 (above).

Submission point number: S11.017

Support/Oppose?: Oppose

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Which part(s)?: Delete Policy 16.1

Reason(s): See my response to S11.016 (above).

Submission point number: S11.018

Support/Oppose?: Support

Which part(s)?: Reword Policy 16.3

Reason(s): If clarification/rewording results in better understanding, how can that be bad?

Submission point number: S11.019

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Delete Policy 17.3 (re permeability limits and stormwater attenuation)

Reason(s): Unable to comment specifically as lacking in relevant technical knowledge. I note the submitter's reasoning includes the commitment to the new outfall upgrade, but as I understand it, the outfall upgrade is only part of a two-stage process, much of the funding for which still has to be confirmed, and consideration of this aspect may be cause enough to not delete the policy. I further note the alternative suggestion presented by another highly involved submitter, to amend this policy rather than delete it (S09.003). People, this is stormwater you are talking about; please, for all our sakes, make sure you get it right.

Submission point number: S11.020

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Delete R10.6.1.8(d) Permeable surfaces

Reason(s): I'm not familiar with the technical details, so can't comment specifically. However I note the alternative suggestion presented by another highly involved submitter to just amend this Rule's Guidance Note (S09.005). People, this is stormwater you are talking about; please, for all our sakes, make sure you get it right. I just want to stress the importance of ensuring that all stormwater-related provisions are planned and actioned to include large 'safety margins'.

Submission point number: S11.021

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Delete R10.6.5.6 re Permeable surfaces

Reason(s): Again, I'm not familiar with the technical details, so can't comment specifically. But once more, this is stormwater-related, and I just want to stress the importance of ensuring that all stormwater-related provisions are planned and actioned to include large 'safety margins'.

Submission point number: S11.022

Support/Oppose?: No opinion/comment

Submitter / Submission point number: Paul and Annette Gregg S12 / S12.001

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Flood mitigation in development, buildings on piles rather than concrete pads

Reason(s): I support consideration of any options to reduce the potential effects of any future flooding in the development and any 'flow-on' effects this would have in the neighbourhood. Building on piles rather than pads would not only mean that the raised homes themselves were more protected from water damage, but presumably also the ground under the homes would not be impervious and would contribute to increased overall site permeability in a flood situation. However I suspect that slabs are simpler and cheaper to install, which might affect affordability of the homes. There may also possibly be site-specific engineering/building constraints (which I have no knowledge about) that could affect the viability of particular foundation options.

Submitter / Submission point number: Health New Zealand, Te Whatu Ora S13 / S13.001

FS 3-12

Support/Oppose?: Support

Which part(s)?: Site contamination issues, S32 Contamination reports

Reason(s): Health New Zealand's statutory obligations include protection of public and community health. As such, the organisation's interest in and overview of contamination-related issues and procedures on the proposed development site of this anomalous brownfield area should be welcomed; it should definitely be considered an affected party and consulted and/or otherwise involved in future site demolition/remediation plans etc. As noted in my original submission, the PSI contamination report only includes site users as potential receptors of contamination effects. I believe that Health New Zealand's involvement would help ensure a wider view of this - to also include as potential receptors the local neighbourhood residents and the public using the Manawatu River Park in the vicinity, and to consider these accordingly.

Submitter / Submission point number: Philip Nell, P.N. Engineering Ltd. S14 / S14.001

Support/Oppose?: Support

Which part(s)?: Consideration of existing use rights of business during site development, parking/vehicle access etc.

Reason(s): It has been my understanding throughout the public part of the PCE planning process that existing industrial businesses wishing to stay on site should be able to do so, and continue to operate at their present level. This presumably is still the case, so these businesses need to be accommodated in, and not disadvantaged by, the site development work.

Submitter / Submission point number: Grant Higgins S15 / S15.001

Support/Oppose?: Neither support in full nor oppose in full

Which part(s)?: Flexibility of structure plan and increase in minimum lot size

Reason(s): I support the idea of less intensive development of the site, and would support an increase in minimum lot size if I believed that it would achieve this. However as previously mentioned (in my response to S10.001, above) I would have concerns that, without further controls, fewer sections might lead to taller buildings on those sections in order to achieve the 'desired' higher density living planned for the project. I agree with the submitter's aspiration to address stormwater concerns by increasing the minimum site size, but larger sections could simply lead to correspondingly larger building footprints on those sections, leaving the same minimum permeable % of net site area, and this scenario would thus not lead to alleviation of stormwater issues. As per my response to S11.008, it does seem appropriate to have some degree of flexibility in the Structure Plan to allow for unforeseen contingencies, but after over 5 years of planning involving PNCC and the major landowners, it would be hoped that most of the design and layout issues etc. had already been addressed and agreed upon, and thus not 'too much' flexibility would be needed. If the site rules/layout are too flexible after the proposed Plan Change rezoning, then the end result may not be what was actually put forward for consultation, and thus may not meet the expectations and/or standards of certain interested parties.

Submitter: S16 Tānenuiarangi Manawatū Charitable Trust, Te Ao Turoa Environment Centre

Submission point number: S16.001

Support/Oppose?: Mostly support

Which part(s)?: General support for development

Reason(s): I too have overall support for the development of housing in the area, though with my own set of concerns and suggestions for amendments etc. as expressed in my own original

FS 3-13

and further submissions. The submitter and I share common ground in recognising opportunities and potential negative impacts of the development. As a direct neighbour of the proposed RRA, I consider the local neighbourhood, its residents and community as part of the environment that needs to be safeguarded from such negative impacts.

Submission point number: S16.002

Support/Oppose?: Mostly support

Which part(s)?: Manawatu River water quality considerations

Reason(s): I agree with the general sentiments expressed. Any Plan Change E development should at least not be to the detriment of river water quality, and if possible contribute to its improvement.

Submission point number: S16.003

Support/Oppose?: Mostly support

Which part(s)?: Stormwater servicing

Reason(s): Stormwater provisions must be 'done right' to protect people and property in and around the development site, and should allow appropriate contingency for climate change induced rainfall events. I cannot comment further than I have already done variously on the technical aspects of the modelling and its outcomes. Budgeted figures for the 2324 Roxburgh Crescent Infill programme are shown in Years 1 and 2 in PNCC's published LTP 2024-2034 (p.145), and I assume that these represent part of the funding for the Stage 1 upgrade work. I support in general this submitter's cautious approach to proceeding with development until stormwater issues have been suitably addressed.

Submission point number: S16.004

Support/Oppose?: Neither support in full nor oppose in full

Which part(s)?: Stormwater run-off provisions

Reason(s): I recognise the need to take precautionary measures to protect downstream parts of the site catchment network from potential contaminants, however I do not have the relevant technical knowledge to comment on the specific relief measures suggested by the submitter.

Submission point number: S16.005

Support/Oppose?: Neither support in full nor oppose in full

Which part(s)?: Stormwater - pervious technologies

Reason(s): I recognise the apparent need for the development to incorporate suitable measures to address overall permeable surface % requirements as part of the overall approach to stormwater management, and support this. However I do not have the relevant technical knowledge to comment on the specific details of those measures or the issues raised and relief sought by the submitter.

Submission point number: S16.006

Support/Oppose?: Support

Which part(s)?: Stormwater - management plan

Reason(s): As my comment above (re S16:003), stormwater provisions must be 'done right', which can't be achieved without them previously being 'planned right'. Several of the proposed rules already include stormwater aspects, but I would support inclusion of an appropriate overall stormwater management plan to clarify development requirements and facilitate better site stormwater control outcomes.

Submission point number: S16.007

Support/Oppose?: Support

Which part(s)?: Stormwater - limited consent notification

FS 3-14

Reason(s): Notifying appropriate outside parties could provide an additional check that all is good with development activities and improved quality of outcomes. I assume the submitter references R10.6.3.4, not R10.6.4.3, in respect of this (discrepancy noted in summarised point).

Submission point number: S16.008

Support/Oppose?: Neither support in full nor oppose in full

Which part(s)?: Urban environment considerations

Reason(s): I agree that the proposed Plan Change should deliver a residential area where the community thrives and is healthy and safe, and I include the surrounding neighbourhood in that statement. However I have some different views on the specifics mentioned by the submitter. I support a range of housing types and styles to enable choice and meet various needs, and for aesthetic value, but I don't support buildings higher than two storeys on the site for reasons discussed elsewhere. I have concerns about the health and welfare aspects of higher density living such as proposed here, including the limited space for private outdoor recreation, like children playing and gardening activities, due to the small section sizes. I have no particular opinion about the presence of cul-de-sacs in this development, but if included, they could provide communal play space (see my response to S11.008), surely better than playing on a through road - kids will be kids. The open green space in the centre of the development will help to link the city to the river and offer a significant break in building density but there is currently little provision in the Plan Change for specific recreation activities there, except a seat intended as a resting place for visitors to the River Park area. Maybe there could be a children's play area there in future (see my response to S06.003)? Or other opportunities for the community to gather together and meet (more seating, community BBQs, a fitness/exercise activity area)? I'm in favour of the green space being used as much as possible by the resident community as well as by visitors to the River Park. However I don't believe that space would ever be appropriate or sanctioned for public gardening activities, especially food gardening, mainly due to the possibilities of residual contamination, even after remediation, resulting from its present status as a HAIL area. Food gardening, and growing plants/herbs for traditional medicine remedies, represent an important part of the well-being of all communities, offering physical and mental benefits as well as food security and sovereignty. PNCC is in the process of adopting a new Food Security and Resilience Policy which recognises these points and more, and yet there is no consideration of, or provision for, this in the current Plan Change. I would support and urge this submitter, as a community leader, to consider how aspects of this Policy might be incorporated into the Plan Change, for the benefit of the new residents and the wider neighbourhood community; and to advocate for such. It's not yet too late to include some new thinking and new provisions, as surely this issue is within the purview of resource management. My own documented response to this has been to argue against the Reserve exchange proposal, and retain the current uncontaminated greenspace for development as a community garden/orchard area, suitably linked into the proposed RRA: for the benefit of the existing local community, the new RRA residents, River Park users/visitors and new residents in potential nearby Kainga Ora redevelopments. This argument, which has been well supported by the existing community, has never been against the central green space or the improved river access in the Plan Change site, just about losing the current reserve land, along with its potential for the community, in order to provide that space.

Submission point number: S16.009

Support/Oppose?: Mostly support

Which part(s)?: Flood risk management

FS 3-15

Reason(s): I agree with the submitter that a prudent approach, including generous margins for climate change, should be applied to mitigating effects of flooding from rainfall events and/or stopbank breaches. My intuitive (and thus maybe incorrect!) interpretation of the '15% probability of failure during a 1% AEP flood event' is that in each year there is a 1% chance of such a flood happening, and that if it did, there's a 15% chance that the stopbank would be breached i.e. a 1 in 670 chance in any one year, which sounds a bit different. Semantics or statistics? It doesn't change my view that when purposely placing a new community in a potentially vulnerable position, the risks of doing so should be managed appropriately. I consider that avoiding adverse effects on the stopbank and other flood hazard relief structures is appropriate, and I see that the Horizons is planning to amend the R10.6.1.8 Note (S22.005) that this submitter wishes to see retained and cross-referenced. I lack the relevant knowledge to assess whether the suggested evacuation access route is truly warranted from a technical perspective, but I wouldn't be against it if it were included in the Plan Change.

Submission point number: S16.010

Support/Oppose?: No opinion/comment

Submission point number: S16.011

Support/Oppose?: Support

Which part(s)?: Contamination - retain note re contamination performance standards in R7.6.2.6

Reason(s): I believe in taking all necessary precautions to ensure correct procedures are followed in relation to contamination issues on the proposed RRA, for the safety and health of people working or living on the site, and those in the surrounding neighbourhood. Leave no potential for mistakes in this aspect of the development please.

Submission point number: S16.012

Support/Oppose?: Support

Which part(s)?: Noise mitigation - suitable additions to site rules etc.

Reason(s): I support all reasonable measures to protect the health and wellbeing of people living near loud noise sources. In the RRA, such noise may be generated by remaining industrial businesses; however as they have existing use rights, noise mitigation controls should not disadvantage those businesses. Amelioration instead needs to be incorporated in appropriate aspects of the new development, including building design. This does seem to be an omission in the proposed Plan Change E amendments. The submitter recognises that undesirable noise may, for a considerable period of time, come from activities relating to the site construction/development itself, and that this should also be taken into consideration for those on site, and I would like to suggest that existing residents in the local neighbourhood are also included in any additional noise amelioration rules etc.

Submission point number: S16.013

Support/Oppose?: Neither fully support nor fully oppose

Which part(s)?: Reflection of Rangitāne in the development

Reason(s): I have no issues with the submitter's general sentiments in terms of promoting local heritage and traditions of tangata whenua. However I have some concern about the financial aspects of actually expressing those physically. For instance, PNCC's current budget for the developing the public land near the river entrance mostly covers just basic infrastructure requirements (Parks and Reserves Assessment 8.11). When there is ratepayer and Government pressure to direct spending towards essential 'nuts and bolts', it is difficult to see how much Council can contribute further to realising these aspirations. Also, since the Plan Change E area is widely acknowledged as a unique pocket of industrial land within the city I believe there should be consideration of some references to its own history in the rezoned development.

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When I came to live in Tilbury Avenue in 1986, the area at the south end of the proposed RRA site was an old Manawatu Catchment Board (an antecedent of Horizons) tree nursery. Poplar and willow trees were grown there, and coppiced poles from the trees were used for soil conservation/erosion control along the Manawatu River. Most of the trees along the south and east sides of the current site, due to be felled as part of the new development, are remnants of this nursery. Since this aspect of the industrial history relates directly to the river, perhaps some of the place names might reflect this, alongside names referencing tangata whenua river heritage? And possibly some of the specimen trees in the open space could be suitable poplar and/or willow species to complement and contrast with indigenous vegetation plantings?

Submitter / Submission point number: Rowan Bell S17 / S17.001

Support/Oppose: Support

Which part(s): Two-storeys only, not three-storeys, along stopbank side of RRA

Reason(s): This submitter has, like me, recognised that a row of closely packed 3-storey buildings dominating the western view from the Manawatu River Park adjacent to the RRA is not a good fit for the area. This person sees, as I do, that various recreational users of the area enjoy the ambience of the current open space, and this would be diminished by three-storey buildings overlooking it.

Submitter: Doug Kidd S18

Submission point number: S18.001

Support/Oppose?: Support

Which part(s)?: Shading, privacy and overlooking concerns

Reason(s): This submitter, like myself, knows the Tilbury Avenue neighbourhood, how the indoor and outdoor living spaces of several houses are oriented north towards the proposed RRA, and how new residential buildings 'just over the fence' would compromise the enjoyment and well-being of those houses' residents through loss of privacy, overlooking and possibly shading, coming from what was previously a valued and accessed greenspace: and that that greenspace was in several cases an important factor in choosing to purchase at that location. I completely support that suitable measures be taken, including restricting both building heights and overlooking windows, and raising the minimum distance from back boundaries, among others, to protect affected Tilbury Avenue properties and residents from the effects of the proposed loss of the reserve amenity currently enjoyed.

Submission point number: S18.002

Support/Oppose?: Support

Which part(s)?: Two-storeys only, not three-storeys, along stopbank side of RRA

Reason(s): The submitter, who I know to be another regular local Manawatu River Park user, a fisherman as well as a walker and occasional cyclist, appreciates the semi-rural environment of the area and recognises, as I do, that the planned row of three-storey buildings would be detrimental to that ambience.

Submission point number: S18.003

Support/Oppose?: Support

Which part(s)?: Pedestrian and cyclist safety in the RRA, clarification and resolution of issue(s)

Reason(s): I also mentioned this in my original submission. I was at the relevant Council meeting, and understand this point to be a reference from a Council Notice of Motion presented there, that the major landowner at the proposed RRA site had expressed safety concerns about the pedestrian/cyclist connection from the site to Ruahine Street and was considering opposing it

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on those and other grounds. Like the submitter, I am unclear about this safety aspect which is not addressed in the Transportation Report or elsewhere in the published PCE literature. Thus I agree with the need to clarify the issue, and resolve as necessary, to ensure public safety.

Submission point number: S18.004

Support/Oppose?: Support

Which part(s)?: Retain Waterloo Park reserve buffer strip in current location

Reason(s): As noted by the submitter, when the land exchange proposal was first made public and consulted on, there was strong proven support from the local community, including myself, to leave this green space reserve *in situ* for potential development as a community orchard. We also both recognise the anger and extreme disappointment of affected Tilbury Avenue residents faced with the potential loss of the green space amenity and access from it to the wider reserve and river environs.

Submitter / Submission point number: Rosemary Watson S19 / S19.008

Support/Oppose?: Support

Which part(s)?: Reduction of riverfront building height limits

Reason(s): I'm commenting on my own original submission as the precedent I gave there is I believe a valid one, of building heights intruding on a rural vista/experience, and was omitted from the summary submission point. So I repeat it again here: "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..." Furthermore, those proposed 3-storey buildings will replace existing trees and greenspace along the southern part of the proposed Plan Change area, which contribute to the current 'rural' views from the River Park (some of these trees are somewhat ironically shown as the frontispiece photograph of the Urban Design Report for the RRA). The RMA encourages people to consider the effects of their activities on the environment, and the River Park is definitely part of the environment in this situation. The public access land these trees are on is the subject of the private sale agreement between Horizons and the majority landowner, which to a certain extent make sense as it effectively 'straightens out' the boundary of the RRA area and allows for more flexibility in site layout and better site yields etc.: but its loss alone already represents a loss of rural experience and valued greenspace for River Park users, especially the considerable number of those who travel along the stopbank rather than nearer the river. I understand the desire for river views from the new development, but I also ask for due consideration of the views/viewpoint of the much larger number of people who use the River Park space "the other side of the fence". Two storeys is enough, please.

Submitter / Submission point number: Linda Bell S20 / S20.001

Support/Oppose?: Support

Which part(s)?: Two-storeys only, not three-storeys, along stopbank side of RRA

Reason(s): This submitter is, like myself, a regular user of the Manawatu River Park adjacent to the proposed RRA. Also like me, she recognises the poor fit for the area, and the negative impact on its users, of a dominating row of three-storey housing 'barrack's. Additionally, we both wonder whether those involved in planning this development have taken River Park users 'views' into consideration in this respect. In my opinion, if they haven't then they should. The City River framework aims to promote the River Park as a destination with increasing numbers

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of users, many of whom will access it through the RRA: surely the experiences of these users need to be factored in to the current Plan Change.

Submitter / Submission point number: Rebecca Hambleton S21 / S21.001

Support/Oppose?: Mostly support

Which part(s)?: Privacy and sunlight concerns, increased section sizes, single-storey limit except for stopbank

Reason(s): Like me, the submitter is an existing direct residential neighbour of the proposed development, and we are both concerned, and will both, along with many others, be subject to any adverse effects of residential construction 'over the fence' if it goes ahead. These adverse effects could include overlooking, shading, and actual or perceived loss of privacy. In my own original submission I made a case asking for consideration of these effects for Tilbury Avenue properties as a particular case, as their living areas are directly north-facing into the proposed RRA site, and additionally they would be directly affected by the potential loss of the buffer strip part of Waterloo Park reserve. I did not include Ruahine Street residents in my submission as their sunlight/shading effects would mostly be from the east. I see though that this submitter's address is down a right of way running east off Ruahine Street and has a northern as well as an eastern boundary onto the existing industrial area. So our situations are more similar than I thought. I would absolutely support rules for both larger sections and single-storey buildings at the same time across the bulk of the PCE site, if I thought it would be seriously considered. However I feel this is not in line with the 'desired' level of housing density for the site and thus unfortunately would never be so. Perhaps a compromise that could be considered for the benefit of near neighbours and the overall fit into the Hokowhitu and River Park neighbourhood is single storey only on all boundaries with existing residential housing and two-storey over the rest of the site; with section sizes for the former to suit so that new buildings are not 'forced' into minimum distance spacing from existing property boundaries. Single-storey recognises the fact that the large majority of existing homes that share common boundaries with the proposed RRA are themselves single storey buildings, and so the transition into the new zone would be more gradual.

Submitter: S22 Horizons Regional Council

Submission point number: S22.001

Support/Oppose?: No comment/opinion

Submission point number: S22.002

Support/Oppose?: Support

Which part(s)?: Stopbank restricted area

Reason(s): Ensuring stopbank integrity by protecting it from damage etc. is an important flood protection/mitigation measure.

Submission point number: S22.003

Support/Oppose?: Support

Which part(s)?: No build zone over stormwater easement

Reason(s): Ensuring stormwater outlet piping integrity by protecting it from damage etc., and allowing ease of access to the pipework for maintenance repairs etc. are important flood protection/mitigation measures.

Submission point number: S22.005

Support/Oppose?: Support

Which part(s)?: Amend 10.6.1.8 Note to Plan Users re stopbank to align with One Plan

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Reason(s): Strengthening the language of the Note appears to offer strengthened stopbank protection and maintenance access capability.

Submission point number: S22.006

Support/Oppose?: No comment/opinion

Submission point number: S22.008

Support/Oppose?: No comment/opinion

Submission point number: S22.009

Support/Oppose?: No comment/opinion

Submission point number: S22.010

Support/Oppose?: No comment/opinion

Submission point number: S22.011

Support/Oppose?: Support

Which part(s)?: Adhere to appropriate procedures/controls re HAIL contamination sites

Reason(s): To ensure safety of people on and in the vicinity of the Plan Change site during development and construction of the RRA; and to avoid spreading contamination through the wider environment. The Lot number mentioned appears to relate to the large block of land at the south of the current industrial area, and part of that is to be rezoned as recreational; presumably this refers to the new open space area next to road D on the proposed Structure Plan diagram. This adds weight to my presumption that PNCC would not be likely to sanction public food production in that area, due to the risk of residual contamination.

Submission point number: S22.012

Support/Oppose?: No comment/opinion

Submission point number: S22.013

Support/Oppose?: No comment/opinion, except unsure how land disturbance mentioned here might or might not relate to the soil disturbance of NES Soil Permitted Activity as mentioned in the DSI Contamination Report.

Submission point number: S22.014

Support/Oppose?: Support

Which part(s)?: Energy efficiency planned into site development in alignment with OnePlan

Reason(s): In general I support energy efficiency initiatives. I'm not familiar with the OnePlan policy but a quick look indicates that it includes not only house design but also layout of the site and lots of a sub-division. However there does not seem to be anything directly related to energy efficiency in the notified Plan Change amendments. Is this an omission, or is this aspect already covered elsewhere in the District Plan? Also, I wonder about, but don't see, mention of, or provision for, EV charging in the One Plan policy or the Plan Change information. Public charging points may be appropriate if no provision for parking is included on individual lots.

Submitter: Jackie Carr S23

Submission point numbers: S23.001 and S23.002 (inferred) - my interpretation of this submission varies a bit from that of the officer summary, hence combining points and teasing apart differently here.

-Which part(s)?: Two-storey limit, not three (along stopbank, inferred)

Support/Oppose?: Support

Reason(s): This submitter, like me, obviously uses and values the greenspace environment of the current River Park area near the proposed development, and does not want its scenic landscape values compromised by overlooking three-storey buildings.

-Which part(s)?: Building density and infrastructure issues

FS 3-20

Support/Oppose?: Mostly support

Reason(s): I would infinitely prefer a less dense building development in this area too. As previously mentioned (re S02.001 and S06.002) there is some concern about the potential pressure on the roll of Winchester School, and as per my comment on S06.001 above, I also have concerns for safety around that school, and the Ruahine Street/Manawatu Street/Pahiatua Street intersection, due to increased traffic flow, especially during the morning rush hour/school drop-off time. It is however difficult to argue for less homes in the development on this basis, when the Transportation Report does not indicate any particular issues arising from the currently proposed density, and the increased traffic flows are predicted to remain well within the capacity of the local roading network. (The local congestion issues we experience currently, and the potential for those to increase in future, are thus also inferred to be well within the capacity of the local population to bear...) So hopefully the consultants are correct. We shall see...

-Which part(s)?: Greenspace and community garden

Support/Oppose?: Mostly support

Reason(s): Like the submitter I have concerns about the lack of regard for existing, and lack of planning for future, greenery and greenspace in high density housing developments such as this one. I absolutely support the idea of a communal 'garden' space being set aside in all developments above a certain size, where the sections are so small that residents have little space to grow their own food, if so inclined. I concur completely about the societal and health benefits of a community 'gathering' space (double-meaning intended). That is why I supported, and still support, the retention of the Waterloo Park reserve buffer strip *in situ*, and its connection into the PCE area: to be such a space - and more - for the existing community, the new residents in the proposed RRA and Kainga Ora developments in the area, and the users of the River Park. If the reserve exchange were to proceed, I'm unsure about the suitability of the 'new' reserve area for a community garden, primarily as much of that area has been used for HAIL activities, with the possibility of soil contamination by hydrocarbons/heavy metals etc., and even with remediation I doubt that PNCC would sanction its use for food production, especially not for tree crops with large root systems. Plus it would appear that aspects of connectivity to the river at the 'new' location are weighted higher by the site developers than food security and biodiversity.

Submission point number: S23.003

Support/Oppose?: Support

Which part(s)?: Climate change/flooding etc.

Reason(s): The submitter recognises the ongoing and increasing likelihood of flooding and other climate-change related events and the need to plan adequately for them. Though this is non-specific, I agree completely. The risks need to be correctly identified and assessed, and then everything that can feasibly be done should be done to protect the proposed development's people and property, as well as the surrounding neighbourhood.

Thank you for the opportunity to make this further submission.

Rosemary Watson

19 December 2024

RAI 04 03
2024
AW:LMS

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

submission@pncc.govt.nz

Dear Madam/Sir,

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

Thank you for the opportunity to provide further 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.

1. Horizons submits in **opposition** to parts of the submission made by S11 Frances Holdings Limited. Specifically, we oppose the following submission points:
 - **S11.020**: Section 10, Rule 10.6.1.8(d)
 - **S11.021**: Section 10, Rule 10.6.5.6
 - **S11.001**: Section 32 Report – Appendix J: Stormwater Servicing Assessment

The submitter contends that these rules are redundant and unjustified. However, Horizons considers these provisions essential as they reinforce Objective 17, Policy 17.2, and Policy 17.3, which give effect to Horizons' One Plan Policy:

RPS-UFD-P8: Urban development and climate change

1. *Urban environments are developed in ways that support reductions in greenhouse gas emissions and improve resilience to the effects of climate change by:*
 - a. *use of urban design, building form and infrastructure to minimise as far as practicable the contribution to climate change of the development and its future use, including (but not limited to) energy efficiency (including methods to ensure whole-of-life energy efficiency), water efficiency, waste minimisation, transportation modes (including use of public transport and active transport) water-sensitive design and nature-based solutions,*
 - b. *urban development being compact, well designed and sustainable, and*
 - c. *requiring a risk based approach to their resilience to the impacts of climate change, including sea level rise and any increases in the scale and frequency of natural hazard events.*

Furthermore, Objective 17, Policy 17.2, Policy 17.3, Rule 10.6.1.8(d), and Rule 10.6.5.6 align with the Palmerston North Future Development Strategy (FDS) which was developed jointly by Palmerston North City Council and Horizons Regional Council.

Horizons acknowledges the concerns raised by Frances Holdings Limited in submission point S11.001, particularly their request to delete Rule 10.6.1.8(d) and either delete or amend Policies 17.2 and 17.3. Their position is based on the claim that, as the Plan Change area is currently 100% impervious, redevelopment will not increase stormwater flows. However, given the existing stormwater challenges in Palmerston North, a precautionary approach remains essential. The National Policy Statement on Urban Development (NPS-UD), Horizons' One Plan (RPS-UFD chapter), and the FDS emphasize the need to ensure urban development does not exacerbate these issues. This is particularly important while the City-wide Stormwater Strategy is still being developed to better understand the scope of the problem.

Horizons seeks the retention of these provisions as they are consistent with the outcomes sought in both the One Plan and the FDS.

2. Horizons further submits on following submission points in relation to the submission made by S09 Palmerston North City Council:
 - a. Horizons supports submission point **S09.001** which aligns with following One Plan policies:
 - RPS-LF-FW-O3: Water quality outcomes
 - RPS-LF-FW-O4: Protection of freshwater ecosystems
 - RPS-LF-FW-P4: Water quality management
 - RPS-LF-FW-P12: Stormwater quality improvement
 - b. Horizons acknowledges the emphasis on addressing climate change aspects in the performance standards outlined in submission point **S09.004**, which gives effect to One Plan policy *RPS-HAZ-NH-P13 Climate change*. However, we highlight that stormwater inundation is identified in the One Plan not as flood hazard, but as an "other types of natural hazard". Accordingly, One Plan policy *RPS-HAZ-NH-P12: Other types of natural hazards* applies to the plan change provisions related to

stormwater management and relevant mitigation methods in areas prone to stormwater inundation.

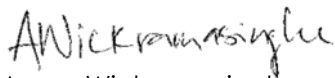
RELIEF SOUGHT

Horizons requests:

- Retention of Policy 17.3, Rule 10.6.1.8(d) and Rule 10.6.5.6 to ensure alignment with One Plan objectives and policies and the FDS.
- Support for PNCC's proposed changes to improve stormwater quality and treatment, in line with One Plan policies.
- Any further, alternative, or consequential relief necessary to address the matters raised and achieve the intended outcomes.

Horizons wishes to be heard in support of this submission. If others make similar submissions, Horizons would be open to presenting a joint submission to the hearing panel.

Yours sincerely,



Aruna Wickramasinghe
SENIOR POLICY PLANNER

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Further submission on Proposed Plan Change E: Roxburgh Residential Area to the Operative District Plan



Submitted on	19 December 2024, 3:41 pm
Receipt number	3
Related form version	1

Your contact details

First name	Doug
Last name	Kidd
Organisation you represent <small>If applicable. Please only answer this question if you are speaking on behalf of an organisation.</small>	Rangitikei Floorings
Postal address	27 Tilbury Avenue, Palmerston North
Email	dkidd@rangitikeifloorings.com
Phone <small>Please provide a daytime contact number</small>	+64275718905

Hearing

Do you want to speak to Council in support of your further submission?	No
--	----

Relevance

What is the best to describe your relevance?	I am a person who has an interest in the proposal that is greater than the interest the general public has.
Explain/specify the grounds for saying that you come within this category <small>Example - Submission number [insert submission reference number here] directly affects the property at XXX, which I own</small>	I reside next to the proposed development.

Your submission

Submission table

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.

Submission point 1

Name of submitter / Submission number

Example - Jane Doe [Submission 1&]

Francis Holdings

What's your attitude towards this submission?

Oppose

What are the particular parts of the submission that you support or oppose?

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.

Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.

Map 7.10 plans for Road D to delete the on street right angle

General

Rule 10.6.1.8(c)(iii) Rule 7.6.2.6 (c)

Please tell us the reasons for my support or opposition.

Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.

SO 11-4

10. I can not oppose or support the perpendicular or parallel parking on Road D.

12. I oppose the transfer of the reserve before the development plan has been approved. A reserve title transfer prior to a confirmed plan would allow potential plan changes that would not benefit the residents of Palmerston North.

11. Amend rule 10.6.1.8(c)(iii) as follows:

a. One dwelling unit on lots of 250 m2 to 400m2.

b. Two dwelling units on lots of 400 m2 to 600m2.

Allow or disallow?

Disallow

I seek that the whole or part (describe part) of the submission be allowed or disallowed.

Please give precise details.

Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.

10. There needs for parking need to be adequate to ensure the access to the river walkway is adequate to ensure that the availability of parking does not interfere with residents parking or reduce visitor access to the river.

12. Disallow the land exchange to be executed once the plan change is approved.

11. I support the developer having the flexibility to adjust the section size to take in to consideration the area to be developed.

You can attach documents in support of your submission point

Submission point 2

Name of submitter / Submission number

Example - Jane Doe [Submission 1&]

Phillip Neal Submission 14

What's your attitude towards this submission?

Support

What are the particular parts of the submission that you support or oppose?

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.

Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.

Plans

Please tell us the reasons for my support or opposition.

Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.

I support the submit request to consider the current use of the owners and business occupiers in the road layout changes.

Allow or disallow?

Allow

I seek that the whole or part (describe part) of the submission be allowed or disallowed.

Please give precise details.

Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.

Consider roading design to support existing businesses and minimize disruptions to residents.

You can attach documents in support of your submission point

Submission point 3

Name of submitter / Submission number

Example - Jane Doe [Submission 18]

Rowan Bell

What's your attitude towards this submission?

Support

What are the particular parts of the submission that you support or oppose?

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.

Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.

Rule 10.6.1.8 (f)

Please tell us the reasons for my support or opposition.

Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.

Allowing 11m - 3 story buildings along the stop bank would change the ambiance and river user experience.

Allow or disallow?

I seek that the whole or part (describe part) of the submission be allowed or disallowed.

Please give precise details.

Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.

Restrict buildings to 9m height.

You can attach documents in support of your submission point

Submission point 4

Name of submitter / Submission number

Example - Jane Doe [Submission 18]

What's your attitude towards this submission?

What are the particular parts of the submission that you support or oppose?

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.

Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.

Please tell us the reasons for my support or opposition.

Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.

Allow or disallow?

I seek that the whole or part (describe part) of the submission be allowed or disallowed.

Please give precise details.

Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.

You can attach documents in support of your submission point
