

Proposed Plan Change G: Aokautere Growth Area

Copies of Original Submissions
Submissions 1 - 57

19 November 2022

SO-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	bo
Last name	yu
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Proposed Plan Change G: Aokautere urban growth
My submission is:	i am oppose this change
I seek the following decision from Palmerston North City Council	
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 2-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Mark
Last name	Currin
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	All developement in Aokautere and the Adderstone Reserve
My submission is:	My family and I am opposed to any widespread developement in Aokautere and in particualr, the proposed changes to the Adderstone area/Pacific drive. There is already trafiic congestion in the Summerhill area, it will ruin the rural/semi-rural feel of the area, the housing density is already high, there is a lack of shops and amenities, and current spaces will be destroyed for ever. Certainly, no significant development should proceed without first building a new bridge accross the Manawatu river as there is already far to much traffic on the Fitzherbert Avenue route during rush hours.

SO 2-2

I seek the following decision from Palmerston North City Council	I seek the council to decline authorising any widespread developemnt for the reasons I have already set out.
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 3-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	JASON
Last name	RAMAN
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	new connection for 208 Pacific Drive and the development of new residential section next to 206 pacific drive?
My submission is:	please advice of what rights or compensation homeowners have to safeguard their homes from disruptions
I seek the following decision from Palmerston North City Council	<p>what are the rights of homeowners directly impacted by development/construction work where damages occurs to homes due to ground moving from heavy machinery and vehicles?</p> <p>What plans are in place to manage noise and air pollution from dust etc</p> <p>Also, with the new connection for 208 Pacific Drive, what disruption to access my property given new road needs to be constructed?</p> <p>what are timeline please for construction to commence</p>
Supporting information	

SO 3-2

Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

FUTURE USE OF ADDERSTONE RESERVE

SO 4-1



We are proposing to uplift the reserve status and dispose of part of Adderstone Reserve under The Reserves Act 1977.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

For more information, see our privacy statement, pncc.govt.nz/privacy

Submissions close

4pm, Monday 5 September 2022

Mailing to:

Palmerston North City Council
Private Bag 11-034, Palmerston North
Attention: Democracy & Governance
Manager

Delivering to:

Council's Contact Services Centre
Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/adderstone

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name **Audrey**

Last name **Shepherd**

Organisation / If applicable

Postal address

Email

Phone / Please provide a daytime contact number

YOUR SUBMISSION

The specific part/s of the proposal my submission relates to are as follows:

I am happy about the overall plan regarding the Aokautere urban growth and the repurposing of parts of Adderstone reserve.

However, I would like to express my concern regarding the proposed pedestrian crossing on highway 57 between Cashmere Dr & Johnson St.

This piece of road has significant visibility issues and a pedestrian crossing would complicate an already difficult drive.

Maybe a tunnel under the road would be safer.

I would like to bring to your attention that the corner at H57 & Cashmere Dr is quite difficult. There is poor visibility when moving out of Cashmere drive on to H57 and there is no right turning bay when driving from Ashhurst

Kind regards
Audrey Shepherd

FUTURE USE OF ADDERSTONE RESERVE

SO 4-2



MY SUBMISSION IS:

Include whether you support or oppose the various parts of the proposal or wish to have them amended, and the reasons for your views.

I seek the following decision from Palmerston North City Council / Give precise details about the decision you want the council to make.



Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If others make a similar submission, I will consider presenting a joint case with them at a hearing Select 1 option	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Signature A L Shepherd	Date 15 Aug 2022
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A signature is not required if you make your submission by electronic means.

SO 5-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	David
Last name	Basire
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Transport assessment - page 32 - Recommended mitigation
My submission is:	<p>1. Right hand turn from Old Farm Road to SH57 is already an issue at peak traffic times, and needs improvement as soon as possible. A merging lane for traffic turning right out of Old Farm Road would assist with traffic flows, allowing a turn with a traffic gap from the right only. However, with the number of vehicles turning right onto Old Farm Road from Summerhill Drive, this is only a minor improvement, and a longer term plan must be looked at.</p> <p>2. I support the signalling of the intersection from SH57 to Pacific Road, including better options for pedestrians, and cyclists. I would strongly recommend that the traffic speed limit for the road between Old Farm Road to at least Johnstone Road be reduced to 50 (preferred) or 60 KPM.</p> <p>3. Whilst I support improvements to the lower Ruapehu Drive to Summerhill intersection, I do not support taking away a right turn out of Ruapehu Drive. The proposed roundabout at Williams Terrace is not a great option for traffic going towards town. An alternative allowing a safe right hand turn out of Ruapehu Drive needs to be considered.</p> <p>4. I strongly support the improvement of Ruapehu Drive to Summerhill intersection for cyclists. Either of the proposed options would improve conditions, If the signalled alternative is chosen, this should also accommodate cars turning right out of Ruapehu Drive towards town.</p>

SO 5-2

I seek the following decision from Palmerston North City Council	
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 6-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Jessica
Last name	Somerton
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Proposed Plan Change G: Aokautere Urban Growth
My submission is:	<p>I oppose the planned walkway to go through the council land that backs onto our section at 88 Johnstone Drive. The path would be quite close to our house and would create a safety issue with people having access to the back of our house. This makes me feel uneasy.</p> <p>I would like the Council to consider an area for skating in the new development.</p> <p>I would like to Council to consider a roundabout at the intersection of Summerhill Drive and Old West Road. This is a busy intersection and with the continued growth, it will become dangerous.</p> <p>I support the pedestrian crossing to be created - P. It would be good if the speed limit could be reduced in this stretch of road.</p>
I seek the following decision from Palmerston North City Council	Please consider an alternative placement for the walkway so that it does not back onto our yard directly. If the decision is made this walkway back onto our land, I would like the Council to consider there be some security installed (fencing, planting, etc.) so that our house is not directly accessible to people walking along the path.

SO 6-2

Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 7-1

SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

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Manager

Delivering to:

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Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name

ALAN DAVID

Last name

SMEATON

Postal address

Phone / Please provide a daytime contact number

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes

No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition

Yes

No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

I refer to page 15 of Plan Change G addressing parks and reserves servicing. Figure 15 shows options for extending walkways, including a couple of options for connecting walkways from this area to Tutukiwī Reserve.

SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

**MY SUBMISSION IS:**

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

I fully support the specific provisions which the council has planned for the Aokautere area. More housing is needed, and this takes into account the need to provide green spaces and recreation areas.

I would like to see some form of connection from the end of Abby Road linking to the proposed connection (black line) across the gully and on into Moonshine Valley Reserve, even if that means an alleyway through any housing development which crosses its path.

I seek the following decision from Palmerston North City Council / Give precise details

Looking at the wider picture of development, it will be good to have all the additional housing as proposed, however I am concerned about Aokautere and Summerhill Drives and the increased traffic carried on these roads. I would like to see a roundabout at the Old West Road junction, because for many residents in Greenwood and Jasmine Places it is very hard, particularly at busy times of the day, to turn right into Summerhill Drive. Having a roundabout would present an option for people to turn left and go right around the roundabout before heading into the city.

**Supporting information**

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

 Yes NoIf others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option Yes No

Signature

Date

14-8-2022

A signature is not required if you make your submission by electronic means.

SO 8-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Warren
Last name	Sara
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	
My submission is:	The area already struggles as it is with traffic without putting hundreds more sections up there. Yes, you will have to look at state highway 57 etc etc but at the end of the day its all going to bottle neck at a bridge over the river that is way inadequate.
I seek the following decision from Palmerston North City Council	
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

9-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Karen
Last name	Wilton
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Appx 5 Traffic Assessment Plan page 2 section 10 summary of provisions
My submission is:	<p>I am supportive of the Aokautere development proposal - it's a great idea to make good use of this lovely part of the region and hopefully at the same time take the pressure off the existing city and overdevelopment there.</p> <p>The tracks and gulley are a city asset and great to see their future safeguarded p2 10(e).</p> <p>It is logical to ensure development of business and housing - residents in the new area should have access to local shops, childcare etc.</p> <p>Care needs to be taken to ensure mixed development of housing and I support the option of a new residential village page 2 10(c) - great to see our senior citizens considered.</p> <p>Please make sure section sizes are restricted to protect this area from having no green - quality of life for residents and wildlife needs decent garden spaces to retain character of this area.</p> <p>Appx re traffic - traffic flow and access will be one of the</p>

9-2

	<p>biggest issues. Great that there is reference to second bridge - it would be crazy to proceed with this development without providing for a second main artery, especially in these times of climate change. Fiddling with traffic flows in Fitzherbert is a very short term solution only - aside from many angry citizens we will be the landlocked laughing stock of NZ if we trap ourselves in with one bridge!</p>
<p>I seek the following decision from Palmerston North City Council</p>	<ul style="list-style-type: none"> -Commit to a strategic and systematic growth plan rather than haphazard development - eg ensure that the proposed business (including essential petrol station) do actually happen. -Commit to the PNITI of a second bridge - it can't just be on the never, never and in the end will determine the success of this development. -Please work with Kainga Ora so that we locally control and can influence their developments to include this new area - there's an opportunity for them to build from scratch and not keep making crammed ghettos for people in social housing. -Ensure the minimum allowed section size ensure the new suburb has a socially and environmentally successful space by specifying housing with decent garden and privacy spaces.
<p>Supporting information</p>	
<p>Hearing</p>	
<p>I wish to be heard in support of my submission</p>	<p>No</p>
<p>If others make a similar submission, I will consider presenting a joint case with them at a hearing</p>	<p>No</p>

SO 10-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Stephen Noel and Carole Anne
Last name	Sorsby
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Proposed Plan Change G: Aokautere urban growth
My submission is:	<p>The proposal states that following the initial development of Pacific Drive, developers were allowed to continue development without an overarching plan, the only constraints apparently being the land restrained for services, parks or reserves. The consequences of this, again clearly stated in the document, has been a disconnected neighbourhood with no managed traffic flows and almost all traffic entering or leaving the development through Pacific Drive. This was not clear to purchasers when initial consents were granted. Those living on Pacific Drive, closer to state highway 57, including IPU which straddles Pacific drive, now have to endure the increasing noise and inconvenience as a relative quiet, short suburban road has become a highway. Bear in mind that when the original houses were built double-glazing was not mandatory meaning that those who built with living areas to the front of their property are now seriously impacted.</p> <p>It is evident from the proposal that the absence of a district plan over the past 15-20 years now limits what the planners are able to achieve in terms of a logical traffic plan that would dilute traffic flows around the development. Consequently, they plan to manage traffic through “junction upgrades “along Pacific Drive adding to the noise and inconvenience of the existing residents. Moreover, the additional traffic, is likely to be bunched together by the upgrades, increasing both waiting times and danger when</p>

SO 10-2

	entering onto SH57 which itself is carrying increasing traffic from the Tararua and Hawkes Bay districts.
I seek the following decision from Palmerston North City Council	That the request to change to the District plan G: Aokoutere Urban growth be declined. That a traffic management plan is developed and approved that provides alternative routes onto SH57, reducing the flow on to Pacific Drive from those areas currently under development .
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 11-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Des
Last name	Waters
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Aokautere reserve and the land next to it.
My submission is:	<p>I oppose this idea</p> <p>The green space is what makes us special.</p> <p>The roads and schools won't cope</p> <p>The public transport is not good enough</p> <p>The cost associated with getting across town will impact on some individuals</p> <p>The shops and infrastructure is at capacity at the present time</p> <p>The walk ways and foot paths are not kept well enough and are dangerous for the increased number of people especially young children.</p>
I seek the following decision from Palmerston North City Council	I would like the proposal to be dropped and more green space and keep existing green space.
Supporting information	Screenshot_20220820-081748_Chrome.jpg
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 11-2



SO 12

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	ian
Last name	king
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Map 7A.3E
My submission is:	I support the proposal. BUT the map is a little hard to follow re boundary of subdivisions ,and what's happening where and when it is proposed happen. The map needs to be clearer including the information on it. Our neighbour's are saying the same thing as it is difficult to follow. The information should have been split up and number to make it easier to read and find what's proposed. The colored key looks different the lines which show as solid lines but the key is in little squares and dots. And it's hard to read the letter points of interest or change. Thanks for sending it out but reading it and interpreting it is difficult. Needs a better presentation for the residents in the area where we live. It is very plesent living here and we like the are after living in Hokowhitu for many years. Thanks for the update and what is proposed. Keep us informed.
I seek the following decision from Palmerston North City Council	
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 13-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Mary
Last name	Morgan-Richards
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Map 7A.3E H (continuation of Valley Views); Q Pedesterian/Cyclelink; I (new connection into rural. Public and active transport connections
My submission is:	wish to see amendment
I seek the following decision from Palmerston North City Council	<p>I support the council making plans to increase housing in Palmerston North. I oppose development that reduces habitat for native plants and animals so wish to see an amendment that would provide greater protection for wetlands and canopy trees. The council should identify mature native canopy trees within the Aokautere area and legally protect them.</p> <p>I support the council making plans to improve paths for walking, jogging and cycling. Active transport is an excellent way of saving money on health care. Currently Turitea Road has a great deal of use by members of the public on bikes, walking dogs, jogging, riding horses. As with other local rural roads there are no footpaths, but the one-way bridges slow traffic. Map 7A.3E shows a new planned connection between Valley View road and Turitea road. If this connection remains as a cycle/walking track it will be good news for the new development. Loop tracks are valuable for walking, jogging, cycling. I do not wish to see this connection made into a road for cars. The increased traffic from the new housing has the potential to greatly increase traffic load on small roads not suitable for 80km/hour speeds. I assume within the new housing plan (growth area) speed limits will be 50km/hour. If the connection I and Q is used by vehicles it will result in accidents as increased traffic compete with "active transport".</p>
Supporting information	
Hearing	
I wish to be heard in support of my submission	No

SO 13-2

If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes
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SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

ENCC Rec'd 22 AUG 2022

Note to person making submission

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- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name

STEWART

Last name

DAVIES

Postal address

Email

Phone / Please provide a daytime contact number

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes

No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

Yes

No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

SUMMARY OF TECHNICAL REPORTS

PAGES 1, 2 TRANSPORT ASSESSMENT

SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

THE TRAFFIC ASSESSMENT TO INCLUDE AN
UPGRADE OF SH 57 AND CASHMERE DRIVE
INTERSECTION.

I seek the following decision from Palmerston North City Council / Give precise details

1 TO RECOMMEND TO WAKA KOTAHĪ THE
INCLUSION OF A RIGHT HAND TURN LANE
FROM SH57 INTO CASHMERE DRIVE
AND A RIGHT HAND TURN LANE FROM
CASHMERE DRIVE INTO SH57.

2 REDUCTION OF SPEED FROM 70KM/H TO 60KM/H



Supporting information

Please attach all files to the end of this form before submitting it.

1 COPY OF TECHNICAL ASSESSMENT. 2 PHOTO OF
INTERSECTION. 3 COPY OF EMAIL
FROM NHS GROUP OUTLINING SAME ISSUES AS ABOVE.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes No

Signature

D.M. Jones

Date

21/08/2022

A signature is not required if you make your submission by electronic means.

Summary of Technical Reports:

In considering and preparing Proposed PCG the Council commissioned relevant technical reports and supporting documents. These included the following:

1. Transport Report
2. Cultural Impact Assessment
3. Aokautere Ecology Report and addendums
4. Acoustic Assessment
5. Geotechnical Report and addendums
6. Landscape and Visual Assessment
7. Stormwater Management Strategy
8. Aokautere Centre & Retail Report
9. Parks and Reserves Servicing Memorandum

A Masterplan and accompanying Urban Design Planning Controls Report were also prepared by McIndoe Urban as part of the Structure Plan process. Given the explanatory role of these documents, with their role to inform the Structure Plan and provisions, they are not summarised below. These reports are at Appendix 3 and 14 to the Section 32 report.

This summary sets out the key findings and recommendations of the technical reports to assist with understanding the background technical work underpinning the section 32 Report for Proposed PCG, however, it is not intended to be a substitute for the full reports.

1. Transport Assessment:

Council commissioned a Transport Assessment for the plan change area, which was prepared by Harriet Fraser, Traffic Engineering & Transportation Planning. Ms Fraser's assessment reviews the existing local transportation characteristics, makes recommendations regarding the proposed internal road network and its connections with the existing road network, and gives a summary of the potential traffic effects associated with the development of the Aokautere area for residential purposes under the proposed zoning.

Ms Fraser's assessment finds that, based on existing travel mode share behaviours, there is the potential for Proposed PCG to result in significant additional vehicle traffic on the local road network. However, she considers that with the mitigation measures recommended, the proposed Structure Plan would allow for the plan change area to be developed in a manner which is consistent with the District Plan traffic and transportation objectives and policies.

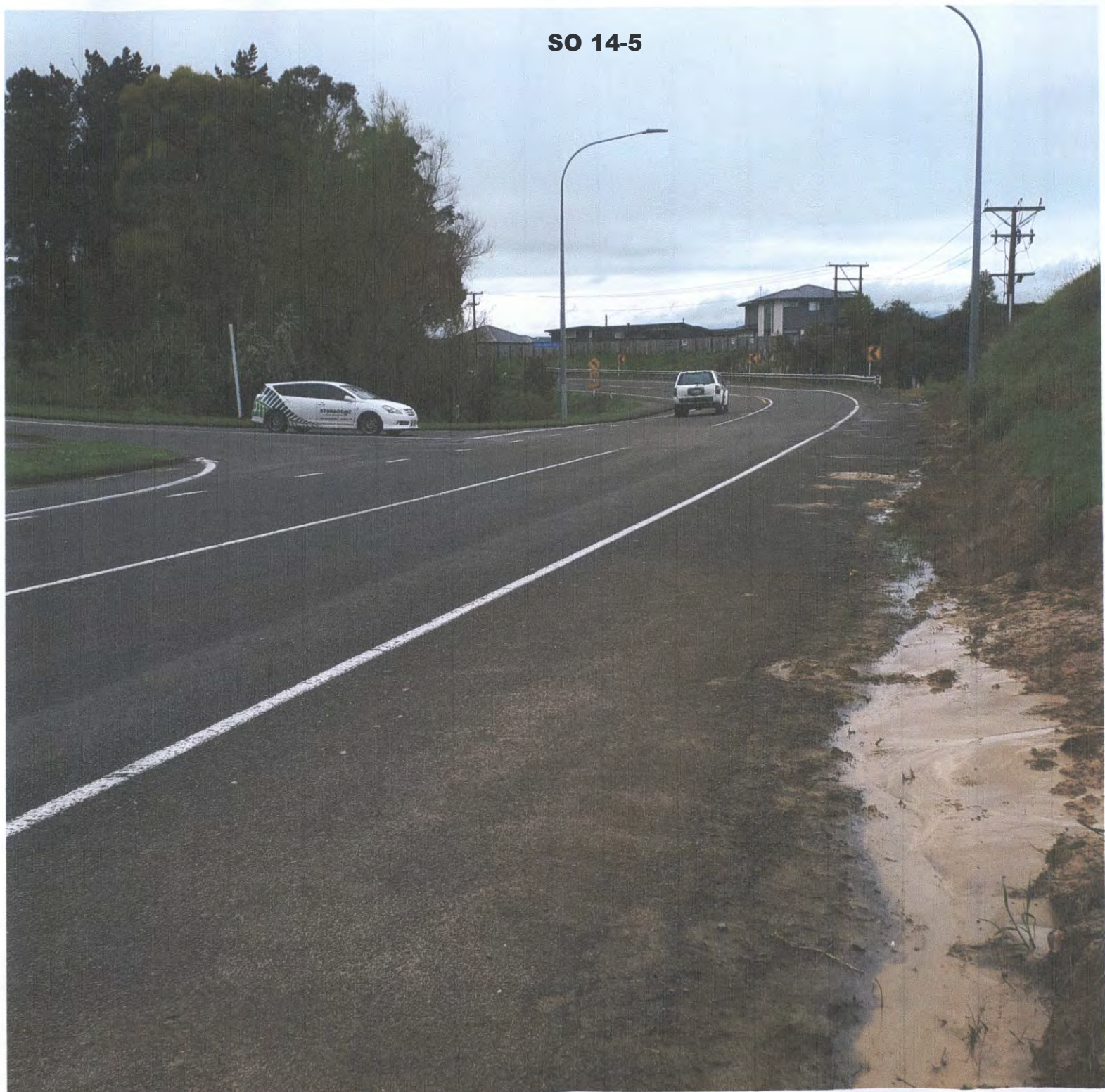
Recommendations:

SO 14-4

- Improvements should be made to facilitate safe right turns from SH57 Old West Road into SH57 Aokautere Drive, which could be achieved with a wider central median and longer merge lane. Given safety on this turn is already a concern, these improvements should be completed prior to the development of the plan change area.
- The SH57 Aokautere Drive/Pacific Drive intersection should be signalised. There is already a need to provide for pedestrians and cyclists in this location and Pacific Drive will accommodate the majority of traffic associated with the further development of the Aokautere area. There is existing need for these improvements, so they should be completed prior to the development of the plan change area.
- It is recommended that Ruapehu Drive operates with left in/ left out with an opportunity for U-turns created further to the south along Summerhill Drive. A right turn out of Mountain View Road would need to continue to be accommodated. One possibility would be to introduce a roundabout at the Williams Terrace intersection with Summerhill Drive. This would also assist vehicles turning to and from Williams Terrace. There is existing need for these improvements, so they should be completed prior to the development of the plan change area.
- An option for safely accommodating cyclists travelling between the northern end of Ruapehu Drive and the City should be developed. This might include introducing a crossing facility across Summerhill Drive (signalised or an underpass) or accommodating two-way cycle flows along the eastern side of Summerhill Drive and towards the Fitzherbert Bridge. There is existing need for these improvements, so they should be completed prior to the development of the plan change area.
- Further review of the safety of the intersection to accommodate additional traffic on the Valley Views and Turitea Road approaches is recommended.
- An option for a future connection from the end of Valley Views to the wider plan change area is accommodated within the Structure Plan.
- Control of the Abby Road and Johnstone Drive Intersections with Pacific Drive, and the future intersections with the existing section of Pacific Drive, should be changed to either roundabouts or traffic signals as needed.
- The planned shared path along the southern side of SH57 Aokautere Drive is needed to connect Johnstone Drive and Pacific Drive and to provide access to the Adderstone Reserve from both directions on SH57. A pedestrian crossing facility, most likely in the form of dropped kerbs and a median island, is also needed at a point along the section of SH57 Aokautere Drive between Cashmere Drive and Johnstone Drive.
- Introduction of high frequency bus services which can be accessed from throughout the suburban part of the Proposed Plan Change area.
- Facilitation of commuter cycling between Aokautere and the City.

SO 14-5

SH 57 /
CASHMERE DRIVE
INTERSECTION



SO 14-6

From:
Sent: Friday, 19 August 2022 11:32 AM
To:
Subject: FW: Proposed District Plan Change G: Aokautere Urban Growth

Hi there

I was unable to get to the meeting at the weekend about the changes to Adderstone Reserve but have some concerns about the Cashmere Dr/SH 57 intersection.

I have had a couple of footpath discussions when out in the garden so I know there are a few of us with similar concerns so I thought I would send you out my recent correspondence with the Council.

If you click on their link in response to my second question it lists their recommendations for traffic control.

I will be putting in a submission, even though it is not against the changes to the reserve, as I think now is the time to address the intersection and volume of traffic.

Kind regards

Lynne

Sent from [Mail](#) for Windows

From: [Michael Duindam](#)
Sent: Thursday, 18 August 2022 4:57 PM
To: !
Subject: RE: Proposed District Plan Change G: Aokautere Urban Growth

Hi Lynne,

I've provided some answers to your questions below. Please feel free to ask further questions.

Kind regards,
Michael

From:

Sent: Thursday, 18 August 2022 2:49 PM

To: Michael Duindam <michael.duindam@pncc.govt.nz>

Subject: Re: Proposed District Plan Change G: Aokautere Urban Growth

Dear Sir/Madam

I was unable to attend your meeting on Sunday 14th August as your letter only arrived in my letter box on Friday 12th and I had a prior engagement.

Before I make a submission, however, I have a few queries:

1: Can you please confirm that the extension to Abbey Road will not be opening through to State Highway 57/Aokautere Drive?

Council does not intend to provide a vehicle link from Abbey Road through to SH57. This is reflected in the structure plan. A pedestrian/cycle connection is possible in Council's proposal.

2: I note you are planning junction upgrade signalised/ Pacific Drive and Aokautere Drive. Are you planning anything with Cashmere Drive intersection?

Council's reporting has identified a range of existing safety issues in the wider transport network, including at Pacific Drive/Aokautere Drive and Cashmere Drive. Council's transport expert has made a range of recommendations to improve safety prior to development proceeding. This includes safety improvements at Pacific Drive, but not Cashmere Drive. You can find these recommendations [here](#) (see pages 32 for a summary table of interventions)

3. Are you planning on lowering speed limits at all?

Safety improvements could include speed reductions. Waka Kotahi will make this determination, which will be influenced by any changes to accommodate intersection upgrades and the provision of cycle and pedestrian infrastructure.

Kind regards

Lynne Rea

Sent from [Mail](#) for Windows

SO 15-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Lynne
Last name	REA
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	<p>Whilst I am not against changes to the Adderstone Reserve per se, I am concerned about the traffic volumes and speed levels (70 kph) at the intersection of Cashmere Drive/SH 57 (Aokautere Dr). I have reviewed the Transportation Assessment supplied by Harriet Fraser Traffic Engineering and Transport Planning (dated 28/7/22) and do not believe any of their recommendations will mitigate the problem we have at this intersection, in fact there is every possibility it will be worse.</p> <p>I believe that whilst realigning for changes to Abby Road etc. it is an opportune time to take into consideration alterations to this intersection.</p>
My submission is:	<p>At the Cashmere intersection, when wanting to turn right onto SH 57 (Aokautere Dr), there is limited vision of traffic approaching from the left (Johnston Drive direction) due to the angle of the corner. With expected increase in volume of traffic, as mentioned in the Transportation Assessment, this will become more dangerous. There is also an issue when coming along SH 57 (from Johnston Drive direction) to turn right into Cashmere Dr, as there is limited vision (again due to the angle of the corner) to see oncoming traffic and for vehicles behind you to note your intention beforehand, there is no slip lane to allow someone to come through on your inside.</p>
I seek the following decision from Palmerston North City Council	I would like the Council to investigate the feasibility of a roundabout at the intersection of Cashmere Drive/SH 57 (Aokautere Dr), along with a lowered speed limit (50 kph?).
Supporting information	
Hearing	
I wish to be heard in support of my submission	No

SO 15-2

If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes
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SO 16-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Brian
Last name	Hewson
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	No idea
My submission is:	<p>Intrigued as to why Palmerston North is following Auckland and going for urban sprawl rather than intensification in inner city areas.</p> <p>Intrigued as to whether a traffic plan has been incorporated into this proposal or whether it is an afterthought. I can see issues with traffic numbers exiting this area and significant impact on Tiritea Valley Road and Valley Views. There will also be impact for those in the Ruapehu Drive , Silkwood Place and Cashmere Drive areas attempting to exit and travel west along Aokautere Drive during busy morning periods. There will also be significantly more impact on motorists/cyclists attempting to exit Old West Road/SH57 onto Aokautere Drive to travel north/east.</p> <p>I am intrigued as to why Valley Views and Tiritea Valley Road were not included in the proposal given it is likely both of these rural residential areas will end up being high speed traffic routes for residents in the new residential areas.</p>
I seek the following decision from Palmerston North City Council	<p>Provide more detail on the proposal and its impacts. This is pretty shoddy.</p> <p>Fill in potholes as Palmerston North is now becoming known as Pothole Palmy and that will necessitate a change in branding.</p>
Supporting information	
Hearing	
I wish to be heard in support of my submission	No

SO 16-2

If others make a similar submission, I will consider presenting a joint case with them at a hearing	No
---	----

SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



SO 17-1

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, the Reserves Act 1977 and the Resource Management Act 1991, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

For more information, see our privacy statement, pncc.govt.nz/privacy

Submissions close
4pm, Monday 5 September 2022

Mailing to:

Palmerston North City Council
Private Bag 11-034, Palmerston North
Attention: Democracy & Governance
Manager

Delivering to:

Council's Contact Services Centre
Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name **Inga**

Last name **Hunter**

Postal address

Email

Phone / Please provide a daytime contact number

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes

No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

Yes

No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example page number, provision or map number

The extension of housing to the top of the hill above Moonshine Valley Road, especially the first 500metres or so is extremely concerning with regard to the increased risk of flooding and storm water overflowing causing landslides. The recent flooding is an example of current and future weather changes with climate change, so the amount of rain falling on this area is only going to increase in volume. The soil does not absorb water very well so surface run-off is a real problem already.

SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



SO 17-2

MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

I wish to have the provisions amended to prevent housing between the last gully before the start of the downhill slope and the hill and for this area to be made a reserve. I do not believe that adequate consideration has been given to the increase in water drainage, the poor soil absorption and the already substantial water flow this area already receives and does not cope with. Retention ponds are inadequate and will overflow in winter. Water currently streams down the hill, under and around my house, down my drive to the road and across to my neighbours. I have made insurance claims for flooding into my house. Increasing housing density close to the edge of the slope will disturb the existing water flows and increase storm water volumes, especially in winter when the current drainage already is overwhelmed hence making a poor situation much worse. It is avoidable if the plans are amended to move housing further away from the end of the slope to Moonshine Valley Road. The risk of landslides will be markedly increased with risk to both the new housing and the existing houses on Moonshine Valley Road.

I submit the following information to the City Council / Give precise details

I would like considerably more space left between housing and the edge of the hill to Moonshine Valley Road. I would also suggest using the last gully as the edge to the housing with water drainage to the main road and the large storm water drains so that there is no possibility of water coming over the edge. A reserve with increased water retention and disbursement systems could be made in place of housing.



Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes

No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes

No

Signature

Date

25 August 2022

A signature is not required if you make your submission by electronic means.

SO 18-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Robert
Last name	McLachlan
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	
My submission is:	
I seek the following decision from Palmerston North City Council	
Supporting information	PlanChangeG.pdf
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 18-2

Submission on Proposed Plan Change G – Aokautere

Robert McLachlan

I oppose the Proposed Plan Change G on the grounds that

1. It would increase emissions, rather than decrease them.
2. It would create low-density suburban sprawl leading to Palmerston North's most car-dependent suburb.
3. The proposal does not take into account recent changes to the National Policy Statement on Urban Development or the Emissions Reduction Plan.

The proposal is to add about 1030 dwellings on 450 hectares, leading to a density of a bit over 2 dwellings per hectare – exceptionally low. The very low density is due both to the site (which contains some gullies, and potentially up to 10% native bush cover) and to the traditional suburban layout with a lot of sections for single family homes. (There are some medium-density parts, but they are included in the total.)

Contrast this to the famous low-car development of Vauban, Germany, in which 2000 dwellings were built on a 38 ha site from 1998-2006.

The overall design looks like what was built in Hamilton in the 1960s, single family homes and wide streets separated by bushy gullies. That was understandable 60 years ago. In the present climate emergency it would be disastrous. It would be like declaring war on our children. Frankly, I was ashamed to be reading all the fine words about reducing emissions, transforming to a low carbon transport system, etc., in a proposal that does completely the opposite.

In addition to the low density, the location is far from the centre of Palmerston North, which (as the proposal notes) most residents will be travelling to and from. From one end of the region to Aokautere Drive is 3.5 km (roughly the distance from Ruahine St to Botanical Road), and to the Square, 9 km. The existing part of this suburb is already one of the most car-dependent parts of the city. Only 1% of residents get to work by bus (4% walk, 4% bike), and I suspect most of those are in the older parts of Poutoa with a journey of less than 9 km.

The traffic report predicts an extra 8000 vpd, doubling traffic heading into town, where the Fitzherbert Ave/Te Awe Awe intersection is already at capacity, with limited options to increase it.

The suggested mitigation factors (Table 12) are mostly about improving the road layout for cars. There is a suggestion that increasing active and public transport mode share would limit the increase in car traffic to 6000 vpd, but as to how to achieve this, the report says, "Factors influencing this change include the availability and standard of public transport and active mode facilities, level of congestion along the vehicle route and availability and cost of parking at the destination." This amounts to shifting costs and responsibility onto other

SO 18-3

parts of our society and the planning system. There is no suggestion that Horizons is committed to providing a high quality service to this new suburb; they are already struggling to serve and attract patronage in Aokautere/Summerhill as it is.

The other mitigation, very wide streets (21m reserve) so that buses can get around easily, also detracts from the urban environment.

Simply providing on-road cycleways is not going to be sufficient to avoid the growth in car traffic when the factors that cause it are designed into the layout of the suburb.

The traffic report does note the goal of reducing emissions 30% by 2030, but it does not quantify the effect of the proposal on emissions, or how any of the listed mitigations would help.

The location is terrible for schools, with no options for primary-aged children to travel to school independently. This will further lock in car dependency.

There is nothing about the important “avoid” leg of the avoid/shift/improve framework of transport planning. Even if the village centre materializes, there will be very few services that people will walk to. Even the supermarket will be 3.5 km away from the far end of the suburb. This pattern of development will do the opposite, it will *induce* car trips, not avoid them.

The NPS-UD was modified in May 2022. Presumably, some or all of the Proposed Plan Change – G was developed before that modification, part of a major nationwide initiative to increase intensification. I am not sure if our RPS has been modified yet in response, or when this must be done by, or when we are at with our Intensification Planning Instrument we are required to create.

In the NPS-UD, Policy 5 relates to the required intensification in Tier 2 cities like Palmerston North. Policy 1(e) and Objective 8 says the urban environment must support reductions in greenhouse gas emissions. Policy 11 says we should develop a comprehensive parking management plan.

For an alternative approach to planning in the context of climate change, we can look to Wellington and Auckland. Wellington's proposed new RPS requires halving emissions by 2030, and that new greenfields developments must demonstrate no increase to emissions either through the building of the houses or by creating car dependency.

Auckland's Transport Emissions Reduction Plan (TERP) adopts sweeping changes. The plan notes:

First, some land use decisions undermine emissions reduction goals. Transport investment is a response to land use. While it is important that new communities on the urban periphery are provided with good transport options, doing so is very expensive and in the case of public transport services it can take many years for patronage to build. Even where there are good public transport options research has found that new communities in greenfield areas typically still drive more than those communities closer to centres. There is also a significant opportunity cost involved as investment in transport infrastructure for new urban areas

SO 18-4

reduces the amount available for investment in existing urban areas where it can be more effectively used to achieve mode shift.

and

A key trend among cities committed to reducing their transport emissions is the recognition that the location of future urban growth and development will have a significant impact on their ability to achieve their climate goals. Many cities, including Auckland, have been developed around the needs of private vehicles since the mid-twentieth century, resulting in extensive low-density greenfield development which reinforces car dependency and increases transport emissions. Research shows that minimising further outward urban expansion and accommodating as much growth as possible within the existing urban footprint is the most effective way to avoid the adverse impacts that greenfield growth can have on transport emissions. While the specific approaches to achieving this outcome vary between different jurisdictions, they all reflect the growing global evidence of the strong relationship between land use planning and transport emissions.

The Emissions Reduction Plan also affects transport and planning. Transport Target 1 is to reduce VKT 20% by 2035 through improved urban form. Individual targets for Tier 2 cities are to be set in 2022, and the VKT reduction programmes for Tier 2 published by 2024. Action 10.1.1 is to “Integrate land-use planning, urban development and transport planning and investments to reduce transport emissions.”

Recommendations

1. Pause work on the Plan and place a moratorium on single-home-sprawl until PNCC’s and Horizon’s responses to the May 2022 NPS-UD modifications and to the ERP are in place.
2. Check that PNCC’s climate plan meets current national climate targets, such as the 1.5°C warming target of the Paris Agreement, and is best practice relative to other New Zealand cities and to best practice in similar cities worldwide. Before lifting the moratorium, determine what proportions of new housing types (fringe/existing/CBD, low/medium/high density) are commensurate with our climate and other urban targets.
3. Demonstrate that PNCC and HRC can provide high quality active and public transport infrastructure and achieve the required mode shift.
4. Investigate low-car developments.

Thank you for the opportunity to submit on Proposed Plan Change G – Aokautere.

Robert McLachlan

SO 19-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	james
Last name	irwin
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Active transport.
My submission is:	Please make clear how active (non-vehicular) transport will be incorporated into the plan, and please ensure that active forms of transport are prioritized, as is set out in the council urban cycle network master plan.
I seek the following decision from Palmerston North City Council	Current active transport options into town from Aukautere leave room for improvement. The only road into town is not separated from the cycleway, the speed limit is 60, and it feels dangerous on a bike. This road will become busier with higher population density. Please consider slowing down this traffic to 50kph. Please consider physical separation between a cycle lane and vehicular traffic. Please consider a cycleway that is completely separate from the main route for vehicles for eg. Connecting with the road to the motu o poutoa/pork chop hill. There are already good walkways to town down gullies to town that are away from the road.

SO 19-2

	Thank-you for considering these suggestions.
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 20-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Patrick
Last name	Morgan
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	
My submission is:	<p>We oppose the Proposed Plan Change G on the grounds that</p> <ol style="list-style-type: none"> 1. It would increase emissions, rather than decrease them. 2. It would create low-density suburban sprawl leading to Palmerston North's most car dependent suburb. 3. The proposal does not take into account recent changes to the National Policy Statement on Urban Development or the Emissions Reduction Plan. <p>The proposal is to add about 1030 dwellings on 450 hectares, leading to a density of a bit over 2 dwellings per hectare – exceptionally low. The very low density is due both to the site (which contains some gullies, and potentially up to 10% native bush cover) and to the traditional suburban layout with a lot of sections for single family homes.</p>
I seek the following decision from Palmerston North City Council	<p>Recommendations</p> <ol style="list-style-type: none"> 1. Pause work on the Plan and place a moratorium on single-home-sprawl until PNCC's and Horizon's responses to the NPS-UD and ERP are in place. 2. Check that PNCC's climate plan meets current national climate targets, such as the 1.5°C warming target of the Paris Agreement, and is best

SO 20-2

	<p>practice relative to other New Zealand cities and to best practice in similar cities worldwide. Before lifting the moratorium, determine what proportions of new housing types (fringe/existing/CBD, low/medium/high density) are commensurate with our climate and other urban targets.</p> <p>3. Demonstrate that PNCC and HRC can provide high quality active and public transport infrastructure and achieve the required mode shift.</p> <p>4. Investigate low-car developments.</p>
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 21-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Prasika
Last name	Reddy
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Geotechnical Report, Technical Report and Stormwater Report.
My submission is:	I just wanted to raise a concern here that there are residents who live in Moonshine Valley and Whisky Way who are very concerned about the storm water and slippage issues that will be created. The maps just show the assessments of the area of the proposed development. What about and assessment of the land adjacent to it. Can we have a Geotechnical and stormwater report done for the areas that our properties lie on because we are seeing worse rainfall every year.
I seek the following decision from Palmerston North City Council	Can we have a Geotechnical, stormwatwr and technical report for the residents of Moonshine Valley and Whisky Way who border the development...specifically how the storm water and slippage will affect our area.
Supporting information	
Hearing	
I wish to be heard in support of my submission	

SO 21-2

If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes
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SO 22-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Dennis
Last name	Thomas
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	
My submission is:	<p>I support the concept of better planning for growth in this area, and the geography seems to make more sense than on a swamp plain on the other side of Palmerston North.</p> <p>Better road and community connectivity is a great concept.</p> <p>I like the provision for a town centre and possible retirement centre.</p> <p>I support the inclusion of areas for multi-unit housing, and think the proposed placements near open spaces and in the town centre are excellent.</p> <p>As the area is mostly flat, I'd like to see dedicated safe cycle and micro-transport routes, ideally off-road (shared) paths specifically incorporated in the designs, particularly from the major residential areas to the proposed village centre and SH57.</p> <p>Probably not an issue for now, but I'm surprised to see a junction upgrade proposed for Abbey Rd/Pacific Drive, as the former seems no bigger than most suburban streets; and the junction upgrade at Johnstone Drive/Pacific Drive lends itself to a roundabout not lights, given the peak hour flow needs.</p> <p>BUT</p> <p>As this is existing farmland, I am opposed to a big chunk of it being rezoned for "rural residential". It should either be future residential or stay as rural land, not be chopped up into lifestyle</p>

SO 22-2

	<p>blocks.</p> <p>Regardless of the quality of the proposed suburb, at the end of the day it appears we are going to see at least twice as many vehicles entering SH57 as now, through the same roads as now. So for those of us who exit on to SH57 by the supermarket/IPC or down Summerhill Drive, it is only bad news. I also note the traffic lights proposed for SH57/Pacific Drive - these will obviously help those going to Palmerston North in the morning, but will be a traffic hindrance the other 23 hours in the day, and will be of no benefit to those of us downstream, including exiting the supermarket.</p> <p>Finally, I note a new shared pathway proposed for a section of SH57 - this will be of limited utility until the northbound cycle lane is sorted on Summerhill Drive near the coffee cart. The revisions to this part of Summerhill Drive have made cycling more dangerous than it was before (narrower traffic lane, and parked cars limiting visibility for those leaving the garden supplies depot).</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>Do not approve the proposed zoning changes until</p> <ol style="list-style-type: none"> 1) the traffic (and cycling) interface with SH57 and Summerhill Drive are detailed, and 2) measures have been put in place to accommodate the large increase in traffic that will flow down these roads, particularly in rush hours. <p>It is not reasonable consider this Proposal in isolation when it has the potential to materially negatively impact the rest of Aokautere's/Fitzherbert's residents.</p> <p>Do not agree to the establishment of further rural residential blocks.</p>
<p>Supporting information</p>	
<p>Hearing</p>	
<p>I wish to be heard in support of my submission</p>	<p>No</p>
<p>If others make a similar submission, I will consider presenting a joint case with them at a hearing</p>	<p>No</p>

SO -23

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Daniel
Last name	Carrick
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Using the reserve for anything other than plants
My submission is:	To leave the reserve as a reserve to keep Palmy Green. I think Palmerston North should be building up within the ring road ie apartment buildings, Not out where it's using up parks, reserves and farmland
I seek the following decision from Palmerston North City Council	To leave the reserve as a reserve to keep Palmy Green
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO -24

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	George
Last name	Kinder
Gain or affect	
Could you gain an advantage in trade competition through this submission?	Yes
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	Yes
Your submission	
The specific provisions of the proposal my submission relates to are:	Not sure
My submission is:	Not sure
I seek the following decision from Palmerston North City Council	Not sure
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 25-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Shaun
Last name	Henry
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Plan Change G: AOKAUTERE URGAN GROWTH Form 5 under the Resource Management Act 1991
My submission is:	Support on the condition of an additional driving and cycling bridge.
I seek the following decision from Palmerston North City Council	With the growth in the regional surroundings of Palmerston North district and the wider Manawatu, I suggest the need for an additional bridge across the Manawatu Awa. With the focus on high technical infrastructure to meet the demand of the Te Ahu A Turanga - Manawatu Tararua Highway. As the proposed suburb comes to a cross road with the SHW it is important we focus our spending on both "slower roads" but at the same time roads that are able to carry the significate flow of increased traffic once Te Ahu A Turanga opens to the public. Having formally living near Pacific Drive it is noticed the amount of time to get from Fitzherbert to the ring Road has increased, especially with the speed zones lowered as you descend down the Hill towards the Bridge. An additional Bridge Ideally at the Kelvin Grove end of the City would be ideal in terms of aligning with the new Train Hub and meeting SHW 57 towards Te Ahu A Turanga. This would alternately change the face of SHW 3 but would bring

SO 25-2

	a better flow of traffic around the city and not through. In saying that I do support the proposed suburb, on the condition of an additional bridge.
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 26-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Maher
Last name	Fuad
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	
My submission is:	Oppose
I seek the following decision from Palmerston North City Council	Second crossing over the river
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 27-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Linda
Last name	Rowan
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Proposed Plan Change G: Aokautere Growth Area (PC)
My submission is:	<p>I support more intense housing - multi unit and small section (400m2) residential development on the proposed land. I do not support large lifestyle development properties under the rural-residential category. We need to be fully utilising the land available suitable for housing and not building on prime food production on land surrounding Palmerston North.</p> <p>However, I am concerned that there does not seem to be an adequate infrastructure development plan connected to the proposal for increased intensification of housing. How is it proposed that residents will move between the sub development and Palmerston North? Currently the the traffic density on main routes in the Summerhill area and the road surface conditions can not support an increase in traffic. The congestion on the sole traffic bridge will be back to the conditions of 1990s-2000s. In the event of a major natural disaster there will be not access to/from essential services.</p>
I seek the following decision from Palmerston North City Council	That an infrastructure plan including traffic density and flow to address the increased population on the eastern side of

SO 27-2

	<p>the city (Summerhill-Aokautere) be required as part of the change.</p> <p>That low density (spread) housing sections be removed from the plan and replaced with higher density sections to better utilise the subdivided land.</p>
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 28

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	
Last name	
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Transport
My submission is:	<p>I understand that PNCC does not have direct control of public transport. However, public transport and active transport links to central Palmerston North, Massey and the Fitzherbert science centres need to be in place before there is further development in Aokautere. Many Aokautere residents will work or study in these locations. Current transport options, other than private vehicles, are unsafe or inconvenient. A network that encompasses Turitea Road would be most effective, as there has been substantial residential growth there in recent years. Summerhill Drive is already choked with traffic in the morning and evenings. Without serious improvements in alternative transport, this situation will get substantially worse, with concomitant increases in CO2 emissions, air pollution and traffic noise. If Palmerston North continues to sprawl without proper transport infrastructure, it risks becoming a smaller Auckland.</p>
I seek the following decision from Palmerston North City Council	An undertaking that further development in Aokautere does not commence until a robust alternative transport system is in place.
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 29-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	██████
Last name	██████
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	The entire proposal.
My submission is:	My wife and I are strongly opposing your proposed plan change G: Aokautere urban growth because in our view, your proposal is purely based on greed and not on any real needs for the residents of the city. Apart from that, you have completely ignored the serious and obvious negative impacts on the environment and the residents close by. What you see in this proposal of yours is simply and solely the dollar sign, nothing else matters! In our view, future generations would fondly remember you and appreciate your forward thinking if the whole area is turned into a park planted with lots and lots of native trees and children's playgrounds are created. This would not only enhance the attractiveness and reputation of the city but would definitely benefit the wellbeing of all residents and also people from far away.
I seek the following decision from Palmerston North City Council	Drop the whole proposal and turn it into a park where native trees are planted and residents are free to come and enjoy it!

SO 29-2

Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 30-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Ee Kheng
Last name	Ang
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Specific provisions re: Plan Change G to provide additional housing supply in Aokautere- specifically proposed multi-unit housing and Retention ponds (storm water)
My submission is:	<p>I am concerned about aspects of the plan so oppose it. Failing that, I would like to see some amendments to the plan, especially in regard to the retention ponds along the top of my property:</p> <p>There are slips along the hill tops currently; these will only get worse if the retention pond is sited as proposed. Any natural events (heavy rain, earthquakes etc.) will make the situation worse. Despite the planting in the area, my property is potentially in danger of being damaged through overflow and flooding should the retention pond fails.</p> <p>Moonshine Valley Rd. has special characteristics and is home to some aquatic life including koura, shrimps and short fin eels. My objection is linked to two specific issues:</p> <ol style="list-style-type: none">1. Visual impact - tall (two storey buildings) being the most likely outcomes of more housing along the top of the hill2. Potential of development to endanger the existing fauna and flora

SO 30-2

I seek the following decision from Palmerston North City Council	If the development goes ahead, the following changes should be accommodated: 1. Proposed buildings should be set back at least 15m from the boundary (as has been done for Turitea Valley) 2 Attention be given to the special characteristics of Moonshine Valley Rd so as to minimise potential impacts both in terms of aesthetic as well as for existing aquatic life
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	No

SO 31-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Ralph
Last name	Sims
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	a) Lack of assessment of climate change impacts. b) Turitea Road protection for recreational activities.
My submission is:	a) Palmerston North City has a Climate Change Plan (2021) that has a target to reduce emissions by 30% within 8 to 9 years. The New Zealand Government also has an Emission Reduction Plan (May 2022) that outlines a series of emission budgets that "sets the direction for climate action for the next 15 years" (https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/emissions-reduction-plan/).

SO 31-2

The PNCC proposed Plan Change G pays little attention to greenhouse gas emissions that are likely to increase as a result of the Plan being implemented. As one example, the Harriett Fraser Transport plan appended (dated 28 July 2022) does not include the PNCC Climate Change Plan (2021) and the word "climate" is only mentioned in Appendix 1 when quoting Objective 4 of Horizon's Regional Land Transport Plan. No assessment has been made to quantify increased emissions resulting from the proposals under Plan Change G, including additional transport. The need for greater urban density to encourage active transport; the impact of car dependence from any dwellings on the proposed new rural-residential area on the Waters block; provision of a range of local facilities (including sports amenities) in order to avoid travel demand into the city centre; use of standard stormwater design parameters not anticipating more frequent heavy rainfalls, and other similar issues relating to greenhouse gas emissions and adaptation have not been considered. The whole plan exemplifies the traditional concept of building houses (many detached and with large gardens) requiring the need for a roading network to prioritise car access. Alternative urban designs have been demonstrated; the suburb of Vauban in Frieburg-im-Bresau, Germany, being a model that could be replicated to some extent in the proposed Plan Change G (see <https://www.smartcitiesdive.com/ex/sustainablecitiescollective/words-most-successful-model-sustainable-urban-development/229316/>).

Due to climate change impacts, we face an uncertain future. Inter alia, traditional urban planning approaches have to become more visionary rather than business-as-usual as is proposed in Plan Change G. Every policy and development by national, regional and local governments now has to be examined under a climate lens for both mitigation and adaptation. This has not been done with proposed Plan Change G.

b) The Turitea Road is widely used for cycling, walking, dog walking, and horse riding, not just by locals but also by many city residents and visitors to the city. The Green Corridor runs along much of its length and it is part of the Te Araroa walkway route linking to Greens Road. Due to the close proximity to the city suburbs, many people travel to enjoy these facilities, observe the bird life etc. It therefore needs to be protected as a special recreational area of the city. In that regard, adding one or more new roads that connect to the proposed Plan Change G residential or rural- residential areas would be a retrograde step in maintaining its character. Other than the existing Valley Views Road that gives access to dwellings in the existing rural-residential area, only footpaths and cycleways should be the links to the present and planned Summerhill area. In addition, to enhance the recreational facilities offered and to encourage more people to enjoy them, the maximum road speed should be reduced to 50 km/h with traffic calming measures imposed along its length.

SO 31-3

I seek the following decision from Palmerston North City Council	a) Review the entire proposed Plan Change G from both climate mitigation and climate adaptation perspectives. This includes quantifying the potential increase in resulting greenhouse emissions that will result, and their impact on meeting the 2031 target of 30% reduction imposed under the PNCC Climate Change Plan (2021). b) Incorporate Turitea Road under the proposed Plan Change G as a road of aesthetic significance for recreational activities that need protecting with vehicle traffic minimised and slowed down for safety, noise and aesthetic reasons.
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 32-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Sue
Last name	Cooper
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Traffic (Appendix 5)
My submission is:	<p>I oppose the proposed traffic plan. The proposed measures to ameliorate the increased traffic from 1000 extra households (estimated at 8000 journeys/day) take into account only getting the new traffic onto SH57/Aokautere Drive. Almost all of that traffic will then enter Summerhill Drive - a poorly-maintained two-lane city street that is not a State Highway. The exit from this street to Tennent Drive is already problematic (in either direction it requires merging with traffic approaching at 60kph from behind the drivers right shoulder). Getting onto Summerhill Drive from the Massey University direction (either at the river end or the junction with SH57) is also very difficult. These bottlenecks need fixing before any new houses are permitted. I suggest traffic lights. Also, no provision has been made for those already living and working to the west of SH57 on Ruapehu Drive and its cul-de-sacs - approximately 260 houses, two childcare centres, an aged-care facility and a thriving</p>

SO 32-2

	<p>shopping centre including a supermarket which many of the new residents will want to use. Having left-turn only at the junction with Summerhill Drive is farcical, as most exiting from there wish to go the city or Science Centres. No provision at all has been made for those exiting from the SH57 end of Ruapehu Drive (where the shopping centre, childcare centres and aged care facility are located). I again suggest traffic lights at one or preferably both ends. As the land either side of Summerhill Drive at the Ruapehu Drive intersection is not built on, there would be no difficulties in carrying out the required earthworks to create extra lanes. Incidentally, I believe the new housing should have as many cul de sacs as possible in spite of what the planners believe - these foster community spirit and discourage traffic hoons. Walkways would allow pedestrians to move freely, and GPS navigation is available for emergency vehicles!</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>Carrying out traffic control improvements before any new housing is allowed to be built (even with existing traffic levels, these are badly needed). Traffic lights at the intersection of SH57 and Summerhill Drive Traffic lights at the intersection of Summerhill Drive and the off-ramp leading to the Science Centres Traffic lights at the intersection of Ruapehu Drive and Summerhill Drive and Mountain View Road Some provision for traffic exiting Ruapehu Drive to SH57 - a roundabout or traffic lights integrated with those proposed for the Pacific Drive intersection</p>
<p>Supporting information</p>	
<p>Hearing</p>	
<p>I wish to be heard in support of my submission</p>	<p>Yes</p>
<p>If others make a similar submission, I will consider presenting a joint case with them at a hearing</p>	<p>Yes</p>

SO 33-1**Form 5****Submission on notified Proposed Plan Change G – Aokautere urban growth***Clause 6 of Schedule 1, Resource Management Act 1991***To Palmerston North City Council****Name of Submitter: Fire and Emergency New Zealand (Fire and Emergency)**

This is a submission on notified Proposed Plan Change G – Aokautere urban growth (PCG) to the Operative District Plan (the Plan).

Fire and Emergency could not gain an advantage in trade competition through this submission.

Fire and Emergency's submission is:

In achieving the sustainable management of natural and physical resources under the Resource Management Act 1991 (RMA), decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of district plans to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

The main functions of Fire and Emergency, as identified in section 11 of the Fire and Emergency New Zealand Act 2017, are:

- to promote fire safety, including providing guidance on the safe use of fire as a land management tool,
- to provide fire prevention, response, and suppression services,
- to stabilise or render safe incidents that involve hazardous substances,
- to provide for the safety of persons and property endangered by incidents involving hazardous substances,
- to rescue persons who are trapped as a result of transport accidents or other incidents,
- to provide urban search and rescue services, and
- to efficiently administer the Fire and Emergency New Zealand Act 2017.

Fire and Emergency also assists in the following additional functions, as identified in section 12 of the Fire and Emergency New Zealand Act 2017, to the extent it has capability and capacity to do so:

- responding to medical emergencies,
- responding to maritime incidents,
- performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues, providing assistance at transport accidents (for example, crash scene cordoning and traffic control),
- responding to severe weather-related events, natural hazard events, and disasters,
- responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment,
- promoting safe handling, labelling, signage, storage, and transportation of hazardous substances, and

SO 33-2

- responding to any other situation if Fire and Emergency has the capability to assist.

This submission seeks to enable Fire and Emergency to carry out its responsibilities under the Fire and Emergency New Zealand Act 2017 effectively, being the protection of lives, property and the surrounding environment. This submission addresses matters relating to activities required to be undertaken to enable effective emergency response and to provide for the health and safety of people and communities in the Palmerston North City and the Aokautere urban growth area more specifically.

The specific provisions of the proposal that Fire and Emergency's submission relates to are:

Fire and Emergency seeks to ensure that appropriate consideration is given to fire safety and operational firefighting requirements in the Aokautere urban growth area, particularly in relation to subdivision and the servicing of sites.

This will enable Fire and Emergency to achieve its principal objective which is to reduce the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property and the environment.

To do so, Fire and Emergency requires:

- Provision of a firefighting water supply, and access to such supply, in accordance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice to be required by subdivision rules for the proposed Residential Zones in both reticulated and non-reticulated areas; and

Comment on these provisions concerning the Proposed Plan Change is provided below:

Adequate water supply and access for firefighting activities

The provision of adequate firefighting water supply is critical. It is important to Fire and Emergency that any new development that does not have access to a reticulated water supply, has access to an adequate firefighting water supply of some kind. This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore achieves the purpose of the RMA.

The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice) is a non-mandatory New Zealand Standard that sets out the requirements for firefighting water and access. The Code of Practice ensures a consistent approach throughout New Zealand and enables Fire and Emergency to operate effectively and efficiently in a fire emergency. The Code of Practice provides techniques to define a sufficient firefighting water supply that may vary according to the circumstances and is based on an assessment of the minimum water supplies needed to fight a fire and to limit fire spread according to each different building's fire hazards. The firefighting water supply required to address the fire hazard may be established by use of tables within the Code, or by calculation. The Code of Practice is written to provide flexibility as to how the firefighting water supplies can be provided.

Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the Code of Practice and further detailed in Fire and Emergency's 'Emergency Vehicle Access Guidelines' (May 2015).

Key submission themes

Fire and Emergency requires adequate water supply be available for firefighting activities; and adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies. This will allow Fire and Emergency to achieve its principal objective of reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property land, and the environment.

SO 33-3

As such, Fire and Emergency seeks that PCG includes provision for adequate water supply and considers this critical.

Fire and Emergency seek the following decision from the local authority:

- Amend PCG as requested to provide for the safety and wellbeing of people and communities in Palmerston North by making the changes set out in Appendix A to this submission, including any further or consequential relief that may be necessary to address the matters raised in this submission.

Fire and Emergency wishes to be heard in support of its submission.

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

Fleur Rohleder
on behalf of
Fire and Emergency

Date: 1/09/2022

Electronic address for service of person making submission: Privacy s7(2)(a)

Telephone: Privacy s7(2)(a)

Postal address: Privacy s7(2)(a)

Contact person: Fleur Rohleder

SO 33-4

Appendix A: Fire and Emergency New Zealand submission points on Proposed Plan Change G – Aokautere urban growth

The following table sets out the decisions sought by Fire and Emergency, including specific amendments to provisions of PCG. These amendments are shown as **red** (for new text sought).

Provision	Position	Comment	Decision Sought
7. Subdivision			
7.3 Objectives and Policies			
<p>Policy 3.7 To enable subdivision within the Rural-Residential Area identified on the Aokautere Structure Plan, where it is demonstrated that;</p> <p>...</p> <p>i. There is appropriate infrastructure available to service the development, including on-site wastewater and stormwater servicing, which ensures there is no increase in effects on surrounding areas;</p> <p>...</p>	<p>Support with amendment</p>	<p>FENZ supports Policy 3.7 insofar that it promotes the availability of appropriate infrastructure to service developments within the Rural-Residential Area identified on the Aokautere Structure Plan.</p> <p>However, FENZ seeks to amend Policy 3.7 to clearly promote the availability of water supply with sufficient firefighting capabilities.</p>	<p>Amend Policy 3.7 as follows:</p> <p>i. <i>There is appropriate infrastructure available to service the development, including water supply with sufficient capacity for firefighting purposes and on-site wastewater and stormwater servicing, which ensures there is no increase in effects on surrounding areas;</i></p>
7.15 Rural Zone			
<p>7.15.2 Rules Restricted Discretionary Activities Performance standards:</p> <p>...</p> <p>f. Subdivision in Rural-Residential Area identified on the Aokautere Structure Plan</p>	<p>Support with amendment</p>	<p>FENZ supports Rule 7.15.2 insofar as it requires the design principles in Policy 3.7 to be implemented through the subdivision and development in the Aokautere Structure Plan area, which includes the availability of appropriate infrastructure to service development. Should the relief sought by</p>	<p>Amendment sought: <i>Assessment Criteria</i></p> <p>...</p> <p>h. <i>Rural-Residential Development within Aokautere Structure Plan</i></p> <p>viii. <u>How the subdivision is supplied with sufficient firefighting water supply, and</u></p>

SO 33-5

Provision	Position	Comment	Decision Sought
<p>...</p> <p>iii. The design principles contained with Policy 3.7 must be implemented through the subdivision and development.</p> <p>...</p> <p>Assessment Criteria</p> <p>...</p> <p>b. On-site services</p> <p>The extent to which the water, wastewater and stormwater is appropriately managed within the subdivision to ensure the protection of rural residential development and the surrounding environment from any adverse impacts.</p> <p>...</p> <p>h. Rural-Residential Development within Aokautere Structure Plan</p> <p>...</p>		<p>FENZ to Policy 3.7 be accepted, FENZ would strongly support this point.</p> <p>FENZ seeks an additional assessment criteria (h), to include criteria to consider firefighting water supply and access. This is to manage the fire safety risk to life, property, and the environment for Rural-Residential Development within the Aokautere Structure Plan area.</p>	<p><u>access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p> <p><u>ix. How the site access provides unhindered access for fire appliances in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>

7A. Greenfield Residential Areas

7A.3 Objectives and Policies

<p>Policy 1.4</p> <p>To ensure adequate provision of essential services to a level and within a timeframe that will enable development that is appropriate to its location and</p>	<p>Support with amendment</p>	<p>FENZ supports Policy 1.4 insofar that it promotes the adequate provision of water supply to enable developments within Greenfield Residential Areas.</p> <p>However, FENZ seeks an amendment to Policy 1.4 to clearly promote the availability</p>	<p>Amend Policy 1.4 as follows:</p> <p><i>To ensure adequate provision of essential services to a level and within a timeframe that will enable development that is appropriate to its location and intended use including water <u>supply with sufficient capacity for firefighting</u></i></p>
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SO 33-6

Provision	Position	Comment	Decision Sought
intended use including water, wastewater and stormwater supply, telecommunications services, and electricity services.		of water supply with sufficient firefighting capabilities.	<u>purposes and</u> , wastewater and stormwater supply, telecommunications services, and electricity services.
<p>Policy 3.4</p> <p>To require subdivision in the areas identified within the Aokautere Residential Area to be carried out in a manner which ensures that:</p> <p>...</p> <ul style="list-style-type: none"> There will be no new or exacerbated natural hazards due to the proposed subdivision or development. 	Support	Fire and Emergency supports Policy 3.4 insofar as it requires subdivision in the Aokautere Residential Area to be carried out in a manner which does not exacerbates natural hazards.	Retain as drafted.
<p>Policy 5.6</p> <p>To provide an adequate level of infrastructure and services for the proposed development.</p>	Support with amendment	<p>FENZ supports Policy 5.6 insofar that it promotes the adequate provision of infrastructure to developments within the Aokautere Residential Area.</p> <p>However, FENZ seeks an amendment Policy 5.6 to clearly promote the availability of water supply with sufficient firefighting capabilities.</p>	<p>Amend Policy 5.6 as follows:</p> <p><i>To provide an adequate level of infrastructure, and services for the proposed development, <u>including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u></i></p>
<p>Policy 5.8</p> <p>To ensure that the design and layout of any subdivision and development provides for roads identified on the Aokautere Structure Plan in a manner which:</p> <ul style="list-style-type: none"> Achieves an accessible and permeable grid like pattern of 	Support with amendment	<p>FENZ supports Policy 5.8 insofar as it promotes the safe and efficient operation of the transport network for all developments associated with the Aokautere Structure Plan.</p> <p>Adequate access to both the source of a fire and a firefighting water supply is essential to the efficient operation of Fire and Emergency. As such, FENZ seeks to amend Policy 5.8 to ensure the design and layout of</p>	<p>Amend Policy 5.8 as follows:</p> <ul style="list-style-type: none"> <u><i>Provides sufficient access, and enables efficient movement throughout the network, for emergency service vehicles.</i></u>

SO 33-7

Provision	Position	Comment	Decision Sought
<p>development as shown on the Aokautere Structure Plan</p> <ul style="list-style-type: none"> • Delivers a safe, legible and effective movement network which conforms to the One Network Framework and reflects Aokautere’s hierarchy of street types (Map 7A.4A) and cross-sections (Map 7A.4D) • Avoids or minimises adverse effects on the safe and efficient operation, maintenance and access to network utilities and the transport network • Produces a fine-grained network of streets that provide: <ol style="list-style-type: none"> a. permeable and connected neighbourhoods; b. a choice of pathways; and c. access from two directions for most households. • Complements the street network with a web of trails in the gully reserves • Provides circuits of varying length for walking, jogging and cycling • Encourages active travel modes 		<p>any subdivision provides a transport network that provides for sufficient access and efficient movement for emergency service vehicles.</p>	

7A. 5 Residential Zone

SO 33-8

Provision	Position	Comment	Decision Sought
<p>R7A.5.2.1 Restricted Discretionary Activities</p> <p>Any subdivision in a Greenfield Residential Area which is not a Controlled Activity, and any cross lease, company lease or unit title subdivision creating allotments requiring vehicular or foot access to a road listed in 20.6.1.6 of the Land Transport Section as a State Highway or a Limited Access Road is a Restricted Discretionary Activity with regard to:</p> <p>...</p>	<p>Support with amendment</p>	<p>FENZ supports R7A.5.2.1 insofar as it controls subdivision in a Greenfield Residential Area.</p> <p>Adequate access to both the source of a fire and a firefighting water supply is essential to ensure the safe and efficient operation of FENZ in an emergency. As such, FENZ seeks an amendment to R7A.5.2.1 to provide Council with the ability to consider the extent to which firefighting water supply and access is provided for subdivisions within the Greenfield Residential Area. FENZ considers this will improve the safety and wellbeing of communities in these areas.</p>	<p>Amend R7A.5.2.1 as follows:</p> <p><i>Any subdivision in a Greenfield Residential Area which is not a Controlled Activity, and any cross lease, company lease or unit title subdivision creating allotments requiring vehicular or foot access to a road listed in 20.6.1.6 of the Land Transport Section as a State Highway or a Limited Access Road is a Restricted Discretionary Activity with regard to:</i></p> <p>...</p> <p><u><i>u. The extent to which sufficient firefighting water supply, and access to that supply, is provided.</i></u></p>
<p>R7A.5.2.2 Performance Standards for Restricted Discretionary Activity</p>	<p>Support with amendment</p>	<p>FENZ supports R7A.5.2.2(b) insofar as it requires all new lots to have water supply connections. However, the provision of an adequate firefighting water supply, and access to that supply, is vital to ensure FENZ can effectively respond to a fire emergency. As such, FENZ seeks an amendment to this performance standard to ensure the design and layout of any subdivision provides a transport network that provides for sufficient access and efficient movement for emergency service vehicles.</p> <p>FENZ supports R7A.5.2.2(h) insofar as it sets out the transport network requirements for Aokautere Structure Plan. However, a reference to the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 has not been included</p>	<p>Amend as follows:</p> <p>(b) <i>Essential services</i></p> <p><u><i>x. All new lots must be provided with sufficient firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</i></u></p> <p>(h) <i>Transport Network Requirements for Aokautere Structure Plan</i></p> <p><i>As part of any subdivision within the Aokautere Residential Area the following infrastructure requirements must be completed and certified by Council before development, or in the case of (iii), (iv) and (v) below, completion and certification of the infrastructure requirements at the identified level of service thresholds</i></p>

SO 33-9

Provision	Position	Comment	Decision Sought
		therefore adequate consideration for emergency service vehicles is not assured. Adequate access to both the source of a fire and a firefighting water supply is essential to the efficient operation of FENZ in an emergency situation. FENZ considers that the standard is currently insufficient in providing safe and effective access for firefighting purposes throughout the transport network for Aokautere Structure Plan.	<i>must be provided for as part of the staging of the subdivision and development:</i> <u>x.</u> <u><i>Safe and effective access for emergency service vehicles is provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008:</i></u>
15.5 Conservation and Amenity Zone			
15.5.1 Objectives and Policies			
Policy 1.6 To provide for the development and maintenance of essential services and roading infrastructure within the gully network in Aokautere to enable residential development within the areas shown on the Aokautere Structure Plan	Support	FENZ supports Policy 1.6 insofar as it promotes the provisions of essential services and roading infrastructure within the gully network in Aokautere.	Retain as drafted.
15.5.4 Rules: Restricted Discretionary Activities			
R15.5.4.1 Roading and Essential Services within Aokautere Structure Plan Roading and Essential Services provided for in the Aokautere Structure Plan area a Restricted Discretionary Activity with regard to: ... Assessment criteria:	Support with amendment	FENZ supports R15.5.4.1 insofar as it promotes the provision of appropriate roading and essential services for developments within the Aokautere Structure Plan area. However, adequate access to both the source of a fire and a firefighting water supply is essential to ensure the safe and efficient operation of FENZ in an emergency. Further, FENZ requires the ability to efficiently manoeuvre its appliances throughout the	Amend as follows: <i>Roading and Essential Services provided for in the Aokautere Structure Plan area a Restricted Discretionary Activity with regard to:</i> ... • <u><i>The extent to which sufficient firefighting water supply, and access to that supply, is provided.</i></u> • <u><i>Efficient movement throughout the network is provided for emergency service vehicles.</i></u>

SO 33-10

	Provision	Position	Comment	Decision Sought
			road network of any future developments within the Aokautere Structure Plan area. As such, FENZ seeks to amend R7A.5.2.1 to provide Council with the scope to consider the extent to which firefighting water supply and access is provided for subdivisions within the Greenfield Residential Area. FENZ considers this will improve the safety and wellbeing of communities in these areas.	<p>Assessment Criteria:</p> <p>...</p> <p><u>x.</u> <u><i>How a sufficient firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</i></u></p> <p><u>x.</u> <u><i>Safe and effective access for emergency service vehicles is provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</i></u></p>

SO 34-1

From: Submission
Subject: FW: rezoning

-----Original Message-----

From: Judy Stevens <>
Sent: Friday, 2 September 2022 4:25 pm
To: Submission <submission@pncc.govt.nz>
Subject: rezoning

We wish to register our deep concern at the proposed rezoning of the farmland adjacent to the south boundary of Moonshine Valley which will allow small sections with multi unit dwellings. The loss of soil surface to allow rain to soak in will be considerable from both these dwellings and the roads servicing them. Mitigation by council is proposed with retention ponds at intervals along the top of the slopes but these will not cope with our increased rainfall events and water will inevitably overflow down the slopes into the roadside drains. We have a culvert across our land which takes water from these roadside ditches. It is already damaged from excess water so this will only get worse. We also have the Moonshine Valley stream through our property which has become badly damaged by the extra volume of water flowing from the subdivision at the head of Pacific Drive (Brian Green Development) so anymore storm water discharged from these proposed new developments, whether in single events or in a more uniform discharge, will cause even more damage to the banks of the stream. WE TOTALLY OPPOSE THIS PLAN OF SUBDIVISION INTO SMALL SECTIONS WITH INTENSIFICATION OF DWELLINGS FOR THE FARMLAND ADJACENT TO MOONSHINE VALLEY.

We do not wish to speak to our submission.
2/9/2022

Contact details
Stevens, Ray and Judy

Sent from my iPad

SO 34-2



SO 34-3



SO 35-1

Proposed Plan Change G: Aokautere urban growth

Thank you for the chance to comment on the proposed Aokautere growth area plan (Plan change G or PCG).

The submitter

The submitter has owned a rural residential property in Ngahere Park for some 20 years and is in the process of completing the constructing of a residence for his own use.

Prior to retirement the submitter has been a practitioner in occupational and community health and safety for some 30 years. The health and safety work included community safety through to technical risks such as noise and radiation. The submitter has degrees which include a health and safety major.

The submitter has no gain or affect in the recommendations below, other than that of community safety which includes the undersigned as a resident.

I am happy to speak to this submission at a hearing, either as an individual or with others who may hold aligned views.

A health and safety optic

Palmerston North City Council subscribes to the WHO Safe communities and has a specified strategic direction of *Small city benefits, big city ambition*. The Safe communities plan primarily contributes to the Palmerston North City Council's goal of connected and safe communities.

At the 1989 First World Conference on Accident and Injury Prevention in Stockholm Dinesh Mohan¹ (pers comm) made the statement that "*planners have the most responsibility for community safety. They decide on behalf of the community the morbidity and mortality of the citizens*".

The New Zealand Health and Safety in Employment Act (Section 39) places a legal responsibility on designers of structures as having a primary duty of care to those present in the workplace. Whether a community is a workplace is untested in health and safety legislation in New Zealand as far as the submitter is aware. It could be potentially argued by way of example that if a rest home or school is separated from eateries by a busy highway with no means of pedestrian access, that would be unsafe design by the planner (who is at work when planning) for hungry school or rest home staff who work in community that the planner designed. Further Section 39(2)(f) New Zealand Health and Safety in Employment Act would appear to extend protection to the elderly rest home residents and school students whose health or safety may be affected by a use or an activity that is under the control of the planner/designer.

The above two paragraphs are included in this submission to illustrate the gravitas of the responsibility for the planning process.

¹ Indian Institute of Technology, Centre for Biomedical Engineering, Hauz Khas, New Delhi.

SO 35-2

Given PNCC subscription to the WHO safe communities, it is odd that a technical report from the Safe Communities perspective is not included in the PCG.

It is recommended the PCG includes a health and safety technical report indicating alignment or divergence to the Strategies articulated in the PNCC SAFE COMMUNITIES PLAN

[Transport assessment State Highway 57 \(SH57\)](#)

In Aokautere there is already a rest home and shopping centre North of SH57. The PCG proposes setting aside an area for South of SH57 a future school and retirement village. There is an immediate community safety issue in that dominant shopping centre of Summerhill Village is on the other side of SH57.

While the proposal for a smaller shopping centre South of SH57 mitigates some of the safety issues, it is unlikely the smaller centre would cater for more specialised services such as Pharmacy or Farmers Market.

The transport assessment proposed signal the SH57 and Pacific Drive would allow safer passage of pedestrian and cyclists.

It is essential signalling is installed access SH57 and that should be completed urgently prior to development of the plan change area.

It is recommended the signalling, pedestrian path separation and design cater for young children and older residents, as well as the fit readily mobile.

[Transport assessment Turitea road](#)

It is surprising the PCG doesn't not include an assessment the additional traffic on Turitea road from the peri-urban roads A and B. This considered a major oversight and it recommend the planning process is held until this completed.

The following are safety concerns regarding Turitea Road:

SO 35-3

1. Turitea Road is part of the 3000km Te Araora walkway which traverses New Zealand. Walkers are forced out of the green corridor to use the oneway bridges. The walkway guide contains a warning about the busyness of Turitea Road (see highlight in box below).

Old West Road to Black Bridge – 17.5km / 3.5 - 4.5 hours

- From the carpark on Old West Road follow the Upper Turitea Walkway for a short distance then turn right into Turitea Road.
- Continue on the pathway beside Turitea Road. The trail descends an escarpment and enters a Green Corridor riparian planted area before returning to the road.
- Carefully cross the one-lane bridge and continue along the road for another 300m.
- Enter the gate on the left and continue along the path through the riparian reserve strip for 1km.
- The strip is a mix of developing and new riparian plantings by Green Corridors and Palmerston North City Council, one of several that you will walk through on this section of the trail.
- Return to the road at the second one-lane bridge, turn left onto the bridge and walk a further 500m along Turitea Road. Turn right into Ngahere Park Road.
- About 100m down the road cross the bridge over Turitea Stream, turn left through the gate and follow the trail for 1.5km through another Green Corridor planting.
- Return to Turitea Rd, turn right and continue for 7km on a mix of gravel road and bush track then exiting onto Greens Road. Watch out for mountain bikes on this track.
- At a high point on Greens Rd, leave the road and follow the off-road trail down the hill, crossing stiles and bridges along the way. There is a picnic table, and freshwater nearby, at the lower end of this pathway.
- Re-join Greens Rd and after 100m turn left onto Kahuterawa Road.

Warning: This is a busy country road with many vehicles travelling to and from the walking and mountain bike trails at the end of the road. Take care on this road.

Source <https://www.teararoa.org.nz/the-trail/manawatu-whanganui/manawatu-whanganui-trail-notes/>. Viewed 14 August 2022

2. Bikers cannot or do not use the green corridors. The planted green corridors are only suitable for walkers. As such bikers tend to use the length of Turitea road.
3. Parts of the Turitea road are used by professional dog walker services. As one walker has several dogs on leads these fan out to use a good part of the carriage way.
4. Turitea with its rural residential properties is popular with horse riders. These are also forced to use the one way bridges and road carriageway where there is no berm.
5. The S bend south of Valley Views road intersection has no berm on either side. Council has provided a walking track only bypass. This by pass doesn't cater for bikes or horse riders. North bound pedal bikes tend to go slowly to the uphill gradient. This forces vehicles to travel at the same speed behind them due to the narrow road and reduced visibility.
6. There is insufficient sight line on the on the give way when travelling north the one land bridge nearest to Ngarere Park Road. The sight line is obscured by a low ridge to the North West. As such, entry on to the bridge can place the north bound driver at fault and at risk of a collision, as south bound vehicles may be out of sight behind the ridge. The setting sun at mid equinox also causes a hazard in that a south bound the vehicle emerging into view is also coincident with looking directly into the setting sun. This hazard is increased if the north

SO 35-4

bound traffic is only moving slowly, if horse riders, pedestrians or bike riders are using the bridge.

7. The one land bridge South of Valley View Road intersection has extended single lanes through the use of centre medium poles. The poles were installed as a result of double fatality near this bridge in 2018. The length of the single lanes create extra wait for vehicles when walkers, horses, or pedal bikes are using the bridge.
8. Heavy trucks are uses of Tutitea road. These service forestry areas, Palmerston North water supply infrastructure, and industry in Harts Road.

Recommendations:

- **The planning process is halted until Turitea Road is assessed as recommended by the Transport Planning Engineer,**
- **The assessment to take cognisance of the shared use of Turitea road by horse, walkers and pedal bike riders,**
- **The Te Araora Trail walkers are provided with off carriageway passage (ie footpath),**
- **That Turitea road including its bridges is upgraded to at minimum to peri urban standard (ie two lane with separate pedestrian/bike/horse path)**
- **Turitea road improvement should be complete prior to development of the plan change area, particularly given the Te Araora status and mortality history.**

Noise assessment

There is no noise assessment in the technical reports.

At the Mighty River Turitea windfarm call in, the development of Aokautere residential zone would have more than minor noise disturbance from the wind turbines to the East of Aokautere. The Mighty river call in resulted in the turbine nearest to proposed PCG development being removed, although that was done predominantly for visual aesthetics to preserve the outstanding natural skyline features.

The anticipated noise assessment in the original wind farm proposal extended westward to the edge IPU college location. The PCG proposal extends potential dwellings in a South West direction taking them closer to the now consented and built wind turbines. Wind turbine noise a potential negative health affect to those closer to the turbines, particularly on sleep disturbance at night time with low speed wind flows.

It is recommended a boundary noise assessment of the consented wind farms is undertaken and overlaid with the PCG is establish which properties are likely to experience a more than a minor noise effect. The LIM on affected properties should include wind turbine noise disturbance and dwelling design may need to include acoustical considerations.

Other planning matters not covered in the PCG

The matters listed below are inadequacies in planning and or road design that need attention:

SO 35-5

Truck kerb crossing: The submitter has resided until recently in Kelvin Grove which has a number of truck commercial crossings, which service truck depots or supermarket. Some of these are too small to allow longer trucks to do a left turn off the carriage way. Either the trailer wheels cross the berm or alternatively the front of the truck has to move into the opposing carriage way in order to increase the radius of the turning.

It is recommended the kerb crossing widths to commercial centres in the PG6 is increased to allow trucks to do a left hand turn without entering the opposing traffic lane.

Road safety signage stability: Along the higher reaches of Ngahere Park road signage construction is inadequate to with stand the wind. This results in either the signs blowing over or rotating in the wind. There doesn't appear to be routine mechanism for PNCC to rectify these occurrences and as such the signage remains in its damaged state for years. Signage in the peri urban road that passes near the water reservoirs is also likely to be subject to wind damage.

It is recommended road way finding and safety signs are constructed in a way that they stay up and face the intended direction when the wind blows.

Douglas Pringle

Proposed Plan Change G: Aokautere urban growth

SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, the Reserves Act 1977 and the Resource Management Act 1991, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

For more information, see our privacy statement, pncc.govt.nz/privacy

Submissions close
4pm, Monday 5 September 2022

Mailing to:

Palmerston North City Council
Private Bag 11-034, Palmerston North
Attention: Democracy & Governance
Manager

Delivering to:

Council's Contact Services Centre
Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name *NATHAN*

Last name *MEYER*

Postal address

Privacy s7(2)(a)

Email

Privacy s7(2)(a)

Phone / Please provide a daytime contact number

Privacy s7(2)(a)

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition

Yes No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

MAIN MAP ~~DI-D4~~ .DI-D4

SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

I ABSOLUTELY OPPOSE THE DEVELOPMENT OF D1-D4.
WHAT IS THE P.N.C.C THINKING? BELOW THESE
NARROW FINGERS OF LAND IS A SPECIAL GROUP OF
RURAL PROPERTIES WHO ARE ALREADY SUFFERING THE
EROSION EFFECTS OF DEVELOPMENT ALL AROUND. WHY ON
EARTH DOES P.N.C.C PLAN TO PUT MULTI DENSITY
HOUSING SO CLOSE TO A RURAL SETTING???

I seek the following decision from Palmerston North City Council / Give precise details

I WOULD SEEK THE P.N.C.C TO COMPLETELY
SCRAP ALL MULTI DENSITY DWELLINGS ON THE NARROW
FINGERS OF LAND OVERLOOKING MOONSHINE VALLEY.
THERE IS ABSOLUTELY ZERO NEED FOR THIS TYPE
OF DWELLING SO FAR FROM THE CBD. I STILL
STRUGGLE TO COMPREHEND THE THINKING BEHIND SUCH
THOUGHTLESS DEVELOPMENT. I AM TOTALLY OPPOSED TO IT.



Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes No

Signature

Date

4-9-22

A signature is not required if you make your submission by electronic means.

SO -36-3



SO -36-4



SO -36-5



SO -35-6



SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

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- it discloses no reasonable or relevant case
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- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name

Lew

Last name

Thompson

Postal address

Email

Phone / Please provide a daytime contact number:

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes

No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

Yes

No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

Proposed Plan Change G.
Appendix 1, ... district Plan, Part 2
Map 10.19, Page 41.

SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

We built a new family home in Moonshine Valley Road - October 1994.
 We moved out here for the special nature of Moonshine Valley, for
 its open space Lifestyle Living and its privacy.

28 years later, this is still hugely important to us.

I am open to the fact that the land above Moonshine Valley will one
 day be developed. But I care very much for what impact this may
 cause to our open space & Privacy & ^{the} Special Nature of our valley.

I seek the following decision from Palmerston North City Council / Give precise details

I would be Very Much Against having Multi Story units or apartments
 or high density building such as the Wood Gate Subdivision - This would
 go against every thing about our Lifestyle Valley.

I would be open to larger sections like Titirangi or Polson Hill Rd if
 they were built ^{well} back from the Moonshine Valley boundary line.

Another Bridge over the Manawatu River should be thought about
 to handle the extra housing.

Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

 Yes No

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

Select 1 option

 Yes No

Signature



Date

4/09/2022

A signature is not required if you make your submission by electronic means.

SO 38-1
SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

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- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

➤ it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name

Maril

Last name

Thompson

Postal address

Privacy s7(2)(a)

Privacy s7(2)(a)

Email

Privacy s7(2)(a)

Phone / Please provide a daytime contact number

Privacy s7(2)(a)

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition

Yes No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

*Proposed plan Change G
Appendix 1 and District Plan
part 1 and Part. 2c*

MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

We build a new home in Moonshine Valley 28 years ago, 1994. We loved the special nature of the valley and still do. As a foundation original owner we value the nature of our road, it is why we continue to reside here. We would value buildings that complement the nature of the road.

I seek the following decision from Palmerston North City Council / Give precise details

I am against multistorey invasive apartments on the ridge about the valley as it will compromise the nature of our valley. I would like to see single storey housing, that is spaced on sections larger than the Woodgate development. I am aware of slips on the hills or we have experienced this on the hill behind our own home.

Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes

No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes

No

Signature

Mohar _____ Date

409022.

A signature is not required if you make your submission by electronic means.

SO 39-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Anthony and Rosemary
Last name	Gear
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Promontories D1-5 rezoning and cluster housing Maps 7.A-4, 7A.4A, B and D. Storm water run off down gullies 1-18 Map7.A. page 32, para78 Table 5, Appendix 11 and paragraph 81 Traffic and transport. maps 7A.4A page 32 para 78, Appendix 5 and paragraph 81 Visual impact Gully network and Map7.A.4, G1-G18, PCG:Aokautere Growth Plan Document page 39 paragraph 85d
My submission is:	We oppose those provisions which adversely impact storm water, traffic and transport, and the visual impact on Moonshine Valley We support rezoning the gullies to Conservation and Amenity See attached submission
I seek the following decision from Palmerston North City Council	Maintain the Rural-Residential zoning for the promontories D1-5 with minimum section size of one hectare Set back rule of 15 metres from the boundary adjacent to the slopes Restrict building height to a maximum of two storeys. See attached submission
Supporting information	2022.08.31 PNCC plan submission v4.pdf
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

AOKAUTERE URBAN GROWTH**SUBMISSION ON PROPOSED PLAN CHANGE G:**

Anthony and Rosemary Gear

Privacy s7(2)(a)

**SUBMISSION**

We applaud the proposed protection of the gully network G1-G18 Map 7A.3E in the Aokautere/Summerhill region, rezoning to Conservation and Amenity Zone. This will enhance the biodiversity of the region and afford important recreational facilities for the population of Palmerston North.

We deplore the proposed rezoning of the flat land between these gullies, D1-D5 Map 7A.3E. In 1996 Graeme McIndoe Architect recommended the Parklands area (the area between Summerhill and Moonshine Valley, including Woodgate) be zoned for large residential areas to act as a transition area between small residential sections and larger rural residential sections and this has since been incorporated into the District Plan for Moonshine Valley and Polson Hill. For reasons we do not understand this plan for the same area has been dropped completely although the same issues remain. We can only suggest this is because Government have issued a requirement that Councils provide more housing due to the Housing crisis and advocated intensification of houses. However they also advocated that these developments are situated near to, and in, city centres. They did not advocate putting them out in an area with many challenges, not only topographical but also logistical. In addition Government did not include Palmerston North in their directive of multi-unit dwellings. Why would PNCC decide this multi-unit three storey design should be developed so far from the city centre and the amenities there, when they have not advocated this plan anywhere else within the Palmerston North area even though there are many far better areas suited to this?

Traffic. This issue has not been taken seriously. The answer is consistently “buses”. Between 8am and 9am the volume of traffic feeding from Turitea Road, Old West Road, Ruapehu Drive, Pacific Drive, Johnston Drive, Moonshine Valley Road, Polson Drive and all the other minor roads comes together on Summerhill Drive and then over the bridge into town. To add another one thousand plus dwellings to this area will produce a snarl up worthy of Auckland. Hardly anyone in the whole Aokautere/ Summerhill area will not be affected and however many buses are supplied they will not reduce the traffic issue. People do not wish to walk 500m to 1km to catch a bus. No bus will travel up to the promontory clusters of dwellings above Moonshine Valley. The narrow shared Local Streets and dead ends are not easy for a bus and the volume of passengers will not be economically viable. Map 7A.4D

Visual Impact. Almost every house in Moonshine Valley and a number on Polson Hill will be impacted by the row of multi-unit and three storey dwellings all along the brow of the hills. Map 7A.4 Promontory Clusters D1-D5. The plan allows for groups of small sections lining the narrow Shared Local Streets connecting these developments with the wider Aokautere/ Summerhill roading network. Council argue that the trees on the hills will mitigate against the Visual Impact but not all

the hills have trees and a lot are pines and eucalypts which can, and will, be felled in time. The rows of houses will then be in your face. The three storey idea of the new dwellings is so that residents in these dwellings can have a view over the trees. Vision works both ways. They will be just as visible from the houses they overlook. The report also suggests that three storeys is necessary for the residents to see into the gullies and over the native trees that have yet to be planted. Native trees take at least 50 years to grow to anywhere near the height that would necessitate this and by then all these dwellings will have reached their use-by date. Where has the PNCC Design Principal in the District Plan gone where “Visual dominance from multi-unit development on neighbouring development is avoided”?

Storm water. Council up to now have used the gully system in the Aokautere/Summerhill area to remove storm water from all the developments. With the climate challenges we now face this method is utterly unacceptable. We work in the Green Corridors gullies every day and have watched the water pouring off the existing developments into the gully system with detrimental effect. Adderstone Reserve drains the sections on one side of the Pacific Drive area, mostly through drains opening both on the sides of the gully and at the base. In all cases the water is now gauging deep ruts and the force of the water is destroying the vegetation, including uprooting well established kahikatea, a tree used to sitting in wet soil. In Upper Titoki the water off the top Cashmere Drive houses is pouring down the slopes into the water system at the base. In the last few weeks the watercourse has blown out in places where, in early winter, we could step across but now is so wide and deep we cannot cross without climbing down into the base and pulling ourselves up the crumbling bank the other side. The sides of the stream are falling into the water all along the course, taking plants with it, and this is getting worse with each rain event. The Moonshine Reserve has gone beyond this. Water off the subdivision at the head of the feeding gully (Brian Green Development) (G3 Map7A.4) has scoured out the base of this little reserve and changed the meandering and narrow stream into a water course that completely precludes any means to walk up this reserve. The whole base of this gully is now the water course and deep. The paper walking track PNCC proposed for this area can now never be built. The subdivision above this reserve (Brian Green Development) had a sediment pond to control the volume of water at any one time and take out the silt but neither had any effect. These two examples should be listened to by PNCC as our weather events are getting worse.

A further concern for PNCC should be the damage to Bryant’s Bridge on Aokautere Drive. Increased volume of water flowing down Moonshine Valley Stream and the water coming off the Woodgate subdivision into the Church gully (G1 Map7A.4) meet below this bridge and the force of this combined water is eroding the banks. The bridge was repaired some years ago but the road surface is starting to sag again.

The Aokautere Urban Growth proposal plans to continue to use the same method as before to remove the storm water from the plateaux above Moonshine Valley. The water will be discharged in controlled fashion using Detention ponds sited at intervals along the top of the slopes and water will flow in a uniform way into the gullies and into Moonshine Valley. In addition the plan is for a setback of dwellings of 5m from the edge of the slopes. Both these mitigations are badly flawed. The reduction in soil infiltration from the concentration of multi-unit dwellings and the servicing roads is considerable. Water soaking into the 5m setback will saturate these areas in no time and have the potential to make the instability of all the slopes actually worse. All the slopes are already slip prone. Some are historical slips and some current ones and if lessons are learnt from the August 2022 Tasman disaster it is obvious planning should at all costs avoid aggravating unstable areas. A Detention facility is a good system for many areas. They reduce sudden volumes of water pouring

out of areas and although they require a high standard of maintenance they are a good system to use. However, having them on these plateaux is extremely unwise. They will reach capacity by mid winter and thereafter water flowing into them will have to go somewhere. With limited wetland, excess water will flow straight down the slopes. Two weeks ago we had 62mm of rain in 8 hours (we record daily rainfall on our property) and if that is concentrated in either a Detention facility or a Retention pond and it is already full, the damage of this water pouring down any slope in our area will be huge. In addition we are liable to small and/or potentially destructive earthquakes. A fracture in the wall of any facility or pond will be very damaging to any gully, structure or property below them.

GHD Ltd have been observing our issues with storm water damage in Moonshine Valley and have concluded in their report that the damage we are concerned about from this intensive development is “perceived” (page 37). This is an insult to every resident in the Valley. Our concerns are based on very real fact. We have never seen them observing when the stream has been in flood. Rather, their visits seem to have been when the flow is low. They appear to dismiss the damage as “historical” and therefore of no relevance. That is utterly unacceptable. Council by their own rules cannot allow damage to neighbouring properties from subdivisions. They have totally ignored this rule up to now and we can only assume this behaviour will continue.

The Moonshine Valley Stream has already been considerably damaged by the increased generation of storm water draining from the Brian Green subdivision at the head of the gully connecting to Moonshine Reserve, as well as the Woodgate subdivision above the gully draining into the Community Church grounds in Moonshine Valley. Both gullies have been completely altered by the increased and unmanaged storm water and have been severely damaged. For Council to allow more water to flow into these gullies, however good the mitigation, is totally iniquitous. The proposal to plant out these gullies with natives by Green Corridors and other groups is admirable but will not stop the damage to any of the gullies. Our hill, planted with natives over the last 35 years, demonstrates how water flowing down from above will undermine the roots of well established trees which then fall.

The silt that comes down with the storm water results in totally opaque water and this flows into our stream. Moonshine Valley Stream has endangered Giant Kokopu and endangered long fin eels. Also short fin eels, koura, kakahi, shrimps, bullies. The silt settling after rain events is covering the entire bed of the stream and is causing untold damage to our aquatic life, something PNCC and Horizons are aware of but fail to act on. The Manawatu River has an unenviable reputation of poor water quality, in part due to the tributaries bringing in large amounts of silt. If either Council really want to improve the health of the river they need to address the problem at the source...silt in the feeding streams largely caused by these intensive subdivisions.

Proposals.

1. A setback of 15m for all buildings from the edge of the hills with a height restriction of no more than two storeys. Map 7A.4 Promontory Clusters D1-D5. The 15m setback is a requirement for all dwellings overlooking Turitea Valley but so far has been denied for Moonshine Valley. This makes no sense. Moonshine Valley has been identified by PNCC as a “Special Character area” due to its two reserves, one of which has remnant and important original bush, the biodiversity of flora through the whole valley and the 21 native and endemic birds that have now made the Valley home. We also have a population of green geckos and the stream has important aquatic life with Giant Kokopu,

both species of eels and other native life (see above). Turitea Valley has not been identified as "Special Character" so why can they have this setback protection and we cannot? What is the reason Moonshine Valley is treated so differently and so detrimentally? It is not an equal playing field. The 15m setback and restriction of height to two storeys would help with the Visual Impact on Moonshine Valley and to a limited extent would reduce the damage the extra storm water will cause to the already unstable slopes.

2. We have repeatedly asked for a transition area for the plateaux between the gully system in the Aokautere/Summerhill area and above the Moonshine Valley area. Map 7A.4 A minimum 1ha subdivision zoning to connect the small residential sections in Woodgate and along Johnston Drive to the Rural Residential area of Moonshine Valley would solve all the problems of both Visual Impact and storm water discharge.

Warnings are everywhere that climate change has arrived and poses a huge challenge for our country. New Zealand has just experienced the warmest and wettest winter on record and there are examples throughout New Zealand where rain events have caused inestimable damage to infrastructure and the environment. The Manawatu will not avoid this for ever and Council needs to plan for that NOW.

No one should want to leave a legacy of:

1. Destroying the "Special Character" of Moonshine Valley.
2. Destroying the gully system by allowing intensive multi-unit dwellings above them. No amount of mitigation will control the damage caused by the extra storm water generated from the impermeable surfaces.
3. Destroying the health of the Moonshine Valley stream with the endangered species living in it.
4. Failing to act on improving the health of the Manawatu River by ignoring the cause of much of the damage coming down a silt laden tributary.

We wish to speak to the Submission

SO 40-1

From: Submission
Subject: FW: Plan Change G: Aokautere Urban Growth

From: Heather Morgan <>
Sent: Monday, 5 September 2022 9:28 am
To: Submission <submission@pncc.govt.nz>
Subject: Plan Change G: Aokautere Urban Growth

Manager – Democracy and Governance
Palmerston North City Council

Traffic increase and single vehicle bridge.

With current building expansion in the new subdivisions of Johnston Drive, Pacific Drive area, traffic on Aokautere Drive and Summerhill Drive has increased significantly during peak hour traffic periods and around lunchtimes. New house residents cars are being added all the time as new builds continue in Vaucluse Heights, Cashmere Drive and Woodgate Heights.

It is increasingly difficult to get out from Ruapehu Drive and Summerhill Shopping Centre at times.

We still only have one vehicle bridge crossing the Manawatu River at Fitzherbert. He Ara Kothai, the pedestrian and cyclists bridge that was recently built, did not include vehicle lanes. Traffic flows will increase on the Fitzherbert bridge with no alternative route for all the extra residential traffic.

The only other vehicle crossing is near the Gorge and Ashhurst. Too far away to be a variable alternative for additional traffic.

Multi-Unit Residential housing.

Currently houses are being built on very small infill sections like the Japac development in Linton Street. Five houses were crammed onto a site that should not have had more than four houses. It starts to change the nature of the city too much.

A key attraction of Palmerston North as a city to move to, from Auckland, was the lower density of houses. While the city does have a good number of parks and walking and cycling tracks, these will gain more users as more houses are built.

The Silverbrooke development in Whitby, Porirua City is an example of multi-unit dwellings and standalone houses that looked good on paper. In reality the Parks are really parklets, appearing to be less than a quarter acre to support 38 or more households. Green space between units is critical, as are parks and playgrounds that can be used practically by more than one family at a time.

Sufficient off street needs to be allowed for each household unit. Purpose built parking needs to be allocated for visitors and extra family cars so front yards are not cluttered with cars.

The reality of a multi- dwelling subdivision can be quite different in real life from its architect and artist's impression. Green space is essential. Enough resident car parking is essential.

SO 40-2

Thank you for considering this feedback.

Kind Regards

Heather and Grant Morgan.

SO 41-1
SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, the Reserves Act 1977 and the Resource Management Act 1991, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

For more information, see our privacy statement, pncc.govt.nz/privacy

Submissions close
4pm, Monday 5 September 2022

Mailing to:

Palmerston North City Council
Private Bag 11-034, Palmerston North
Attention: Democracy & Governance
Manager

Delivering to:

Council's Contact Services Centre
Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name	Brett	Last name	Guthrie
Postal address	Privacy s7(2)(a)		
	Privacy s7(2)(a)		
Email	Privacy s7(2)(a)		
Phone / Please provide a daytime contact number	Privacy s7(2)(a)		

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission? Yes No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

Multi-unit, multi-storey housing

Lack of Transition Area, Inadequate Setback, Drainage and Stability mitigation

SO 41-2
SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

- Strong objection to multi-unit, multi-story housing on promontories overlooking Moonshine Valley.
- Concerns about inadequate minimal Setback, lack of Transition Area, inadequate measures to mitigate drainage issues.

- Concern that the minor Adderstone Reserve plan change has overshadowed the far wider implications of Plan Change G for potential submitters.

See attached for reasons.

I seek the following decision from Palmerston North City Council / Give precise details

- Exclude medium density multi-unit, multi-story housing from promontories.
- Amendments required to Setback distance and Stormwater mitigation.
- Inclusion of Transition Area adjacent to Moonshine Valley.

See attached for details.



Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes

No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes

No

Signature

Date

5 September 2022

A signature is not required if you make your submission by electronic means.

SO 41-3

Submission: Plan Change G: Aokautere Growth Area 2022

Moonshine Valley concerns:

- **Multi-Unit, Multi-Story Housing**
- **No Transition Area**
- **Inadequate Setback**
- **Drainage and Stability**

This submission supports the introduction of an integrated plan in principal. However, significant amendment is required, seeking greater consideration given to the special character of Moonshine Valley Rural Residential Area.

Inconsistencies and contradictions between the District Plan, Plan Change G and the Aokautere Structure Plan are highlighted.

- **Multi-Unit, Multi-Story Housing**

The submitter strongly objects to the extremely incongruous placement of multi-unit, multi-story housing of up to 11 metres on the promontories above Moonshine Valley. The National Policy Statement Urban Development (NPS-UD) is driving housing intensification, but no local precedent exists as there is no other outlying area of greenfield development in Palmerston North where this type of intensification is planned. There could not be a stronger disparity in development between these and Moonshine Valley. This issue was very clearly opposed in 2019, but has obviously been ignored since with astonishing hubris. Intensification legislation is, elsewhere, well described as “*poor and rushed*” (“Three Story Nightmare Delayed”; OneRoof News, 31 August 2022).

In this location medium density multi-story adjoined buildings are in conflict with the aims of DP 7.2.3 (p.3); 7.3.1.3-5 (p.5); R7.6.2.1 Assessment Criteria a, b, c. (p.36); R7.15.2.1 (p70); 10.3 Objectives and Policies 2.2 (p.4); R10.6.3.1 Criteria h. (p.34); R10.6.3.2 Assessment Criteria f (p.36); Plan Change G, Landscape Assessment (PCG-LA); Village (p.10). In addition, these buildings and placement

SO 41-4

is in complete contrast with that consideration afforded the Hokowhitu Lagoon Residential Area (DP Map 10.6.3.3 (g) p.80) where “(v)isual dominance from multi unit development on neighbouring development is avoided.” (DP 7.10.10, p.27). Overlooking Moonshine Valley, multi-story and multi-unit dwellings do not fit “within the character of existing neighbourhoods.” (DP 10.1 Introduction p.1), and certainly “may be less feasible than traditional detached dwellings.” (PCG Section 10, Costs p.76).

Housing intensification and multi-unit, multi-story dwellings with limited on-street parking are obviously more suited to being in closer proximity to the central city (DP 10.3 Objectives and Policies 1.2 p.3) and “well served by public transport” (DP 10.3 Objectives and Policies 1.6 explanation p.4). The District Plan clearly supports the intention of the NPS-UD, however, the Aokautere Structure Plan (2022) does not.

Encouraging this type of housing on the outskirts of the city and the fringes of limited public transport is also in conflict with the aim of limiting the effects of climate change by reducing travel (Eco-City Strategy 2021-31), and is counter to the intention of the NPS-UD.

Moonshine Valley Rural Residential Area is identified as a special character area (DP 7.3.6 explanation p.19) and, as such, is afforded some protection in the NPS-UD from such ill-placed intensification.

- **No Transition Area**

The recommendation for a transition area “between the more intensive subdivision and development associated with the Aokautere residential area and the less intensive neighbouring rural area” was first mooted 26 years ago in the Aokautere Design Guide (1996) produced for the PNCC Strategic Planning Unit. While then specifically relating to nearby Parkland, a transition area is in the District Plan and includes Moonshine Valley and Polson Hill (Plan Change G

SO 41-5

(PCG), Amendments to the District Plan Part 1 and DP, 10.6.1, d.1. p.16). The contributing architect and urban designer to the 1996 guide has now abandoned the transition area recommendation in the Aokautere PNCC Structure Plan 2019, 2022 and the PCG 2022. The exact opposite is now planned for reasons unclear and unsupported.

This submission seeks application of a transition area adjacent to Moonshine Valley retaining some of the existing Rural-Residential overlay. This will ensure that the District Plan policy sympathetic to the semi-rural and unique character of Moonshine Valley is fully implemented (DP 7.3 Objective 3.6 p.19, 7.15.4 p.77). The retention of a Rural-Residential overlay would provide a “*clear gradation of development*” avoiding the harsh abutment of the proposed smaller lots and multi-storied units with the Valleys 1.5 hectare minimum lot size (DP 10.6.1.1.d. p.16). This submission seeks a similar “*interface*” as for Turitea Valley and eastern Pacific Heights (PCG Rural-residential p.11).

The Council is also obliged by the Resource Management Act 1991 (Principle 7.c) to maintain elements of the existing rural amenity such as a sense of spaciousness.

- **Inadequate Setback**

Setback from the escarpment edge and a transition area need to be implemented to ensure the semi-rural skyline is retained, rather than having Moonshine Valley rural outlook adversely dominated by the visual prominence of housing and fencing (Section 32 PCG: 4.4 Community, 81, p.34, Table 7; PCG-LCA Development responses e. p.8). Precedent exists in the District Plan; Section 10, Objective 12 (p.3) and Map 10.6.1 (p.72); fence and building heights (Pacific Drive Extension R10.6.1.1 a. iii, iv & v, pp.12,13, I, p.19; Napier Road Residential Extension R10.6.1.4 d.ii, e.i, p.24), Policies 8.5 and 8.6 (pp.7,8) and the PCG 7.3 Objective 2, 3.4 Explanation (p.16). The proposed plan is in complete opposition to all of these.

SO 41-6

A strong precedent for providing connectivity between residential and adjoining conservation area; the special character of Moonshine Valley Residential Area, and also avoiding visually intrusive buildings on the landscape is well provided for in DP 10; Resource Management Issues; 10.2.12, Objective 7, Turitea Valley (p.6); and Objective 8, Napier Road (p.7); PCG-LCA (p.12). For example, although of quite similar landscape and development, Moonshine Valley is not afforded the same treatment for visual amenity as in Turitea Valley:

The Turitea Valley is valued for its rural character and the visual amenity that such character provides. The growing residential area of Pacific Drive adjoins and overlooks the Turitea Valley, and without careful management of the interface between the two areas, can adversely affect the amenity of the Valley below. (DP 10.2.12, p.3)

The Moonshine Valley “interface” is not being carefully managed. The intrusion and visibility of these adjoined 11 metre buildings from and into Moonshine Valley is significantly downplayed by both the Structure Plan and the Landscape Assessment. For example, relating to Figure 5 (p.12), the Landscape Assessment relies heavily on the retention of a stand of pines that are due for felling and have been thinned since that image was taken. The years to replace these with similar or indigenous growth negate the validity of both this and the Structure Plans assessments completely. In this case local knowledge supersedes a brief site visit.

The published recession planes hardly consider Moonshine Valley. The rear boundary recession planes are clearly inadequate and will perhaps be exacerbated with an “elevated outdoor area” (PCG-LCA 9.1 p.8). The submitter knows that their house and yard is easily viewed from the field above by a person standing there and looking through the pine trees. A multi-story building of 11 metres will magnify this view greatly, severely limiting the privacy presently enjoyed and creating a very unwelcome intrusion and loss of amenity.

Significant setback and a transition area have been sought in submissions from Moonshine Valley residents’ in 2009, 2014, 2015, 2018, 2019. Setback is now

SO 41-7

limited to a minimum of 5 metres merely because of geotechnical concerns (Tonkin & Taylor, 2022). This minimal setback is very clearly inadequate when locating an array of 11 metre tall buildings close to the boundary with Moonshine Valley. It certainly will not “*reduce(s) visual dominance*”, nor will these tall buildings visual impact be “*mitigated by distance and existing vegetation*” (Aokautere Structure Plan 2022 7.4, pp.5,6).

- **Drainage and stability**

Setback greater than 5 metres, such as the 10 and 15 metres enforced on Pacific Drive Extension which overlooks Turitea Valley (DP Map 10.6.1 p.72), and a transition area would help mitigate the issues of stability and drainage with the known difficult soils and perched water tables found in this area (Urban Land Use Capability study, 1989; Tonkin & Taylor, 2005, 2022; expert evidence of soil scientist Dr. Alan Palmer, 2009; DP Section 22; Natural Hazards, and PCG, Section 7, Rural, 7).

As noted in the PCG Stormwater Management Strategy the catchment for Mangaotane stream (“Bryant’s Creek”) includes a number of tributaries that arise in the areas being subdivided. It is now obvious that these streams and the culverts in Moonshine Valley are not able to sustain the increase in stormwater and storm surges from these subdivisions resulting in increased flooding and erosion. Most recently, for example, has been the closure of Tutukiwi Reserve due to erosion of the driveway. This area had been stable for decades.

The comprehensive stormwater assessment by GHD (2022) is clearly designed to justify existing and planned mitigation and is in concert with the landscaping assessment. It does little to allay the concerns of Moonshine Valley residents nor to fulfill PGC Part 1, 7A, Objective 4.7 (p.5). The survey does not seem to have looked beyond the easily accessible parts of the various streams as indicated by the photographs. Stream damage from at least one property was surveyed, but those issues were apparently not included in the final assessment. Instead of on-site observations, greater emphasis appears to have been placed on modeling.

SO 41-8

The submitter notes it is somewhat disingenuous to long-term Valley residents to describe the obvious impacts from the developments as “perceived” (GHD: Conclusions and recommendations p.37). Again local knowledge, observations and concerns must supersede a brief site visit in favourable conditions.

The submitter notes Justice Gendall’s reserved judgment (*Pacific Farms Ltd. vs Palmerston North City Council 2010*) with respect to inadequacies in the handling of stormwater flow from the Johnstone Gully area. In particular, the resource consent RM2111: “*There was no mention of stormwater effects in relation to downstream landowners.*” These effects are now somewhat worse, residents’ concerns are downplayed and appear not to have been inadequately dealt with in this assessment.

- **Conclusion**

This submission seeks that a broader view is taken with the proposed subdivision directly threatening the special character of Moonshine Valley Rural Residential Area. In particular the incongruous presence and close proximity of ill-placed multi-unit, multi-story housing.

The submitter considers that overall the Masterplan 2022 has done little to allay the concerns of Moonshine Valley residents and again highlights substantial planning inconsistencies between developments and areas. In addition, the documents supporting the plan seem more a justification of the status quo than offering real solutions to these issues.

Sincerely,

Mr. Brett Guthrie,

Privacy s7(2)(a)

Privacy s7(2)(a)

Privacy s7(2)(a)

SO 42

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Odine
Last name	Johnstone
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Not in favour
My submission is:	Down grade the area
I seek the following decision from Palmerston North City Council	
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 43-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	chris
Last name	teo-sherrell
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	?? (this is an additional point - please add it to my previous submission - it concerns stormwater generation and management
My submission is:	<p>There has long been concern expressed by the community and elected members about the increase in hard surface area in PN as a result infilling and greenfield development. Some part of the propose plan seem to incorporate things like roadside stormwater treatment and detention gardens which I support. However, there needs to be more controls to limit the amount of hard surface area such as by using permeable concrete or other means to enable rainwater to enter the ground rather than run off it and to limit the portion of properties that can be covered in hard surfaces. It may even be that on-site rainwater detention features are required to attenuate peak stormwater flows.</p> <p>Additionally, stormwater has to be discharged somewhere and given that that is most likely to be into the gullies and ultimately largely into the Moonshine Valley stream then adequate sediment detention and flow attenuation facilities should be incorporated into any design.</p>

SO 43-2

I seek the following decision from Palmerston North City Council	I request the PNCC 13) limit the amount of stormwater being generated from the area by: a) imposing requirements that limit the proportion of private properties that are covered by impermeable surfaces b) requiring rain gardens and similar features to the fullest extent possible to treat and attenuate stormwater flow from public areas c) requiring detention ponds in the gullies to attenuate water flow and detain sediment
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 43-3

Your contact details	
First name	Chris
Last name	Teo-Sherrell
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Appendix 3 Structure Plan (Adderstone Reserve Alternative) Map 7A.4E - I reference this map as opposed to Map 7A.4 on the assumption that the proposed lifting of reserve status on part of Adderstone Reserve will be approved; Map 7A.4A Street Hierarchy; Map 7A.4B Lot Pattern and Density; Map 7A.4C Precinct Plan (Aokautere Neighbourhood Centre); Map 7A.4D Street Type Maps and 7A.3D 1-17 Street Cross Sections.
My submission is:	<p>I do not support the continued expansion of the built-up area of the city and think it would be better to create stronger incentives for intensification of use of the already built-up area. The demographic predictions for the city indicate that the number of households with children is not likely to greatly increase and there are plenty of existing houses and sections with adequate internal and external space for them. Instead we have numerous large houses occupied by one or two people. This is not good resource management. Further development at Aokautere (Pacific Drive and environs) will exacerbate the car dependency of residents who live there because of the distance from most of the facilities in the city and the lack of really good public transport. This increased traffic will generate higher emissions of greenhouse gases (not just talking about exhaust pipe emissions here) and further degrade the livability of Palmerston North - both in conflict with the higher order goals for the city.</p> <p>However, I recognise that, currently, it is difficult to prevent landowners from changing the use of their land and therefore it is better to have strong structure plans and requirements in place to control any change. In that regard, the Aokautere Urban Growth (Proposed Plan Change G) has considerable merit, incorporating a number of features that will result in greater diversity of housing stock on land that</p>

SO 43-4

has comparatively low value for agricultural and horticultural purposes.

However, I still have a number of concerns about the Proposal and think it could be improved. These concerns are about 1) the distribution of recreational land, 2) the distribution of commercial land, 3) the zoning of land on the Pacific Drive spur, 4) the design of the local commercial centre, 5) the design of the streets, 6) residential design controls and 7) Transit routes.

1) The distribution of recreational land

While there is naturally a wide distribution of conservation and amenity land (the gullies) in the area, the proposal does not include an adequate distribution of flat recreational areas where people might be able to play a wide array of small scale games. I am not talking here about full-sized pitches but areas where say 10 people might be able to kick a ball around. There is a sportsfield with space for full sized pitches at the bottom of Pacific Drive (although it needs drainage improvement to be truly useful). The only provision that has been made for such areas is the remnant of the flat part of Adderstone Reserve and the properties at 95 Pacific Drive and the areas in the middle of the medium density housing area. The first two of these are well down the hill at the north end of the area covered by the Structure Plan. The distance from there to the upper part of the area covered by the Plan is as much as 3km - too great a distance for most people to walk to and for younger (but independent) children, too far to cycle. The proposed flat recreational land within the medium density area will largely serve the needs of those living close by and is a good feature of the plan but is likely to be get a lot of use. Peace Tree Reserve at about 181 Pacific Drive has been developed in a way that precludes the sort of games I refer to. There is a need for at least one further small (single lot) flat recreational land area to be included somewhere a short distance upslope from the intersection of Pacific Drive and Atlantic Drive.

2) The distribution of commercial land (refer Map 7A.4G)

Currently it is proposed to have a commercial centre adjacent to, or part of, the medium density housing area. If there is to be a single such centre that is sensible. However, given the long narrow nature of the area covered by the Structure Plan this will still encourage a high level of car dependence for residents living beyond the medium density area. The distances to the centre from the peripheral parts of the area are too great for most people to consider walking or riding to, particularly if they have goods to carry. There need to be additional properties zoned to allow appropriate (quiet and clean) commercial activities at other locations to make the area truly amenable to active transport

SO 43-5

(destinations are needed not just footpaths). Again, a little upslope from the intersection of Pacific and Atlantic Drives would be one such suitable location but near other intersections would also be appropriate. Having such small scale commercial activities permitted at certain locations would ease the creation of local businesses and help create a sense of community.

3) The zoning of land on the Pacific Drive spur (refer Map 7A.4E and 7A.4G)

It appears that land on the Pacific Drive spur as well as below the escarpment in the Turitea Valley at the southern end of the Proposed Plan Area is proposed to be zoned as rural residential. Given the presence of the Turitea Reservoir and Dam and the possibility of it being catastrophically damaged in an earthquake I agree that use of the land within the valley should be limited to low density. However, the land on the spur itself should be utilised more intensively in keeping with good resource management and I see no good reason for any of it to be zoned rural-residential.

4) The design of the local commercial centre (refer Map 7A.4C)

The proposed layout is much too car-dominated with parking being prioritised over creating a 'village square' which would have so many benefits especially in close proximity to the medium density housing area. Parking should, in my view, be limited to the local street (marked B on Map 7A.4C) and to the activity streets marked A and B on Map 7A.4D (Street Types Map). The area marked 'C' on Map 7A.4D should be of limits to motor vehicles (with provision for mobility parking in the first available positions outside this area. Access for delivery of goods would still be convenient even if not necessarily right outside the door of all of the shops.

Relatedly, it seems inappropriate to me that the street leading towards the local commercial centre from the east is marked 'A' in map 7A.4C, indicating that it is an urban connector. If the area between the shops is made into a 'village square', without vehicle access as described above, then there is no need for the street marked 'A' to be an urban connector. In fact it wouldn't connect. It doesn't make sense to funnel vehicles through the local commercial centre (haven't we learned anything from the larger Square in the city centre?). Even if are vehicles are allowed to pass through the local commercial centre, the approach roads should not be considered as urban connectors but as local access streets and designed to keep speeds down to 30km/h and to be shared by people on wheels.

5) The design of the streets (refer Map 7A.4D and Street Cross Sections 7A.3D 1-17)

I generally agree with the proposed hierarchy of streets with

SO 43-6

the exception of the access to the local commercial centre (marked 'A' in map 7A.4C but not coloured blue in map 7A.4D and not lettered there). As mentioned in 4) above, I think this is inappropriate and unnecessary. There is an urban connector (marked blue F) a short distance away linking to Pacific Drive and it is poor design to send signals inviting vehicle traffic to travel through the local commercial centre.

On the street designs generally, I believe that the urban connectors have been designed for a speed of 50km/h which is now recognised as inappropriate both from a safety perspective, a health perspective (higher emissions of particulates and NOx) and a major discourager of cycling. These should be designed with speed limits of no more than 40km/h and a carriageway intended for motor vehicles of no more than 6m.

The local streets should all have, and be designed for, speed limits of 30km/h or lower.

The activity streets A and B should have, and be designed for, speed limits of 10km/h as there are likely to be higher numbers of pedestrians in the vicinity of the local commercial centre.

In several of the street cross sections, it is indicated that shared paths are incorporated. This is poor practice that deters walking because of the excessive speeds that too many cyclists and riders of micromobility devices travel at. Footpaths should be included and be for the sole use of people on foot or using mobility devices such as wheelchairs. The streets should be designed and speeds managed to provide safe passage for riders on the roadway, or separated from the roadway but separate from footpaths.

The Urban Connector A design (p6 of 26 in Appendix 3) is mostly good but a) the footpaths are of insufficient width (should be a minimum 1.8m); b) the cycle lanes are of insufficient width and have no buffer between the lane and parked cars. Both should be made 2m wide with an additional 0.5 as a buffer adjacent to the car parking. These changes would require 1.3 m to be removed from the carriage way and parking. 2m is ample for parking while a carriageway of 6.3m would still be possible. This would help to drivers to comply with a 40km/h speed limit.

Similar comments could be made about the other cross sections but instead of going through them all I ask you to adjust them so that a) speed limits are 30km/h or less on all local streets, 40km/h or less on all the urban connector streets and 10km/h on the activity streets and designed to help drivers comply with those limits; b) that where speed limits are 30km/h or less that riders of bikes and micromobility devices are required to ride on the carriageway and that the

SO 43-7

	<p>carriageway surface texture is such as to be suitable for small wheeled vehicles (i.e. fine chip or asphaltic concrete); c) that in all cases, separate provision is made for pedestrians and people dependent on mobility devices with high quality footpaths of no less than 1.8m width (i.e. no shared paths - they don't work for pedestrians).</p> <p>6) Residential design controls. I noticed in the Urban Connector E diagram that front fences are to be restricted to 800mm and dwellings must be set back 6m from the front boundary. I support the former for the positive effects it has on visual surveillance and connectivity between dwellings and the road. And it just makes it look and feel so much better - one only has to compare Rosalie Terrace with Pacific Drive to see the value of lower fences. It also makes it safer for people using footpaths. I do not support the latter except for garages. I think the front of houses, excepting garages should be able to, but not required to, be built within 3m of the front boundary to increase the amount of private space people have at the rear of their properties as well as to increase the connectivity between dwellings and the street. However, it is really important that the front of garages are set back at least 7m from the front property boundary to avoid visual dominance of the streetscape by the garages and avoid the situation where cars parked on driveways overhang the property and obstruct the footpaths -something that is very common in areas where such controls don't exist.</p> <p>7) Public transit routes Map 7A.4D suggests that public transit is only provided for along Aokautere Drive. Surely this must be an error. If the plan is to contribute at all towards the City's greenhouse gas emissions goals and to create a neighbourhood that isn't car dependent in the way most others in the city are, then there must be public transport provided to the area. There is an obvious route using Johnstone Drive to leave Aokautere Drive then following the urban connector streets upslope to the top of the area covered by the plan and then returning via Pacific Drive to rejoin Aokautere Drive, or occasionally, as an alternative, via Valley Views and Turitea Roads. The route does not need to, and should not, go through the local commercial centre but can go close by it on the route described.</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>I request that the PNCC</p> <ol style="list-style-type: none">1) include in the structure plan at least one additional small, flat recreational reserve towards the upper end of the Structure Plan area.2) include in the structure plan provision for appropriate (quiet and clean) commercial activities at other locations within the area so that more people can reach them by walking or riding.

SO 43-8

	<p>3) zone the area on the Pacific Drive spur, at the most upslope end of the structure plan area as residential not rural residential while keeping that in the Turitea Valley as rural residential.</p> <p>4) change the design of the local commercial centre to as to create a 'village square' without any motorised through traffic or motor vehicle parking within it.</p> <p>5) change the status of the road marked 'A' in map 7A.4C from urban connector to local and redesign to accordingly</p> <p>6) set speed limits of no more than 40km/h on urban connector roads, n more than 30km/h on local roads and no more than 10km/h on activity streets throughout the structure plan area and design the streets to match those limits</p> <p>7) replace all shared paths with separated footpaths and cycle lanes/paths</p> <p>8) adjust the cross section designs of the urban connector streets to increase footpath width to a minimum of 1.8m, cycle lanes to 2.0m plus a buffer where adjacent to parking and decrease the carriageway allocation to motor vehicles to no more than 6.3m.</p> <p>9) allow the non-garage part of dwellings to be built up to 3m from the front boundary</p> <p>10) require the front of garages to be no closer than 7m from the front boundary of the property</p> <p>11) require the tops of front fences to be no more than 800mm above the ground</p> <p>12) ensure that provision is made for public transport routes (including the location of shelters so that there aren't obstacles to installing them) through the structure plan area</p>
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 43-9

Subject: FW: Plan Change G - transportation assessment

From: Chris Teo-Sherrell
Sent: Tuesday, 13 September 2022 10:46 AM
To: Michael Duindam <michael.duindam@pncc.govt.nz>
Subject: Plan Change G - transportation assessment

Hi Michael

I hope things are well with you.

I did an online submission on Plan Change G - Aokautere (Pacific Drive) but have since seen the transport assessment summary and have some comments about its recommendations. Could these please be added to my submission?

Thanks.

My comments refer to the recommendations made on p2 of the Summary of Technical Reports (<https://www.pncc.govt.nz/files/assets/public/documents/council/district-plan/plan-change-g/technical-reports-august-2022/appendix-15-technical-report-summary-proposed-plan-change-g-notification-version-2022.pdf>)

- The first bullet point concerning turning right from SH57 Old West Road/Aokautere Drive intersection:

- it is also hazardous turning right from Summerhill Drive (where it meets Aokautere Drive) into Old West Road. This aspect should also be dealt with. There appears to be room for a roundabout there that would deal with both this and the issue of turning right from Old West Road into Aokautere Drive. With increased traffic arising from Valley Views Road and other development in the Turitea Valley both turning difficulties should be addressed at once.

I seek PNCC to simultaneously address the hazards connected with turning right out of Old West Road into Aokautere Drive and the turning right out of Summerhill Drive into Old West Road.

- The second bullet point concerning the SH57 Aokautere Drive/Pacific Drive intersection:

- this should be addressed in concert with the Ruapehu Drive/Aokautere Drive intersection especially as this latter intersection is closer to the desire line for pedestrians going between IPU and the shopping complex. Offset traffic lights would enable these intersections to be made much safer.

I seek PNCC to simultaneously address the hazards connected with the intersections of Pacific Drive/Aokautere Drive and Ruapehu Drive/Aokautere Drive.

- The third and fourth bullet points concerning the intersection of Ruapehu Drive and Summerhill Drive (the hill section):

- The recommendation about maintaining a right turn out of Mountain View Road while only allowing left turn out of Ruapehu seems confused. Combined with the need to provide

SO 43-10

access for cyclists (heading towards the river) and pedestrians (heading both towards and away from the river), a signalised intersection would be safest. It would also help to decrease speeds on the Summerhill Drive hill,, something that will be needed even more than it is now if traffic volumes increase as a result of Plan Change G. Providing two way cycle flows on the east side of Summerhill Drive will create problems for cyclists on Fitzherbert Bridge (unless that is also widened). It also wouldn't provide for pedestrians. It makes most sense to get both pedestrians and cyclists to the west side of Summerhill Drive. An fully accessible underpass would be difficult to do install to enable this. A signalised intersection would provide for motor vehicle access and egress from Ruapehu Drive in both directions, access to and egress from Mountain View Road, and would be the safest way to provide for pedestrians and cyclists. It would also avoid motor vehicles having to travel additional distance to make use of a roundabout at Williams Tce.

I seek PNCC to signalise the intersection of Ruapehu Drive and Summerhill Drive to address the safety issues for motorists, cyclists and pedestrians.

- the fifth bullet point concerning the safety of an unidentified intersection

- it is unclear which intersection is being referred to by this point.

I seek PNCC to clarify which intersection is being referred to and allow for additional comments in light of the clarification.

- the seventh bullet point concerning the intersections of Abby Road and Johnstone Drive with Pacific Drive

- I support control of these intersections, preferably by means of roundabouts (given the residential nature of the area) but suggest they would be assisted in providing safe access for all road users if coupled with lowering the speed limit on Pacific, Johnstone and Abby.

I seek PNCC to control traffic at the intersections of Abby Road and Pacific Drive, and Johnstone Drive and Pacific Drive, by means of best design roundabouts that provide for pedestrians and cyclists as well as motor vehicles.

- the eighth bullet point concerning a shared path on the south side of Aokautere Drive and a pedestrian crossing facility

- I oppose the use of a shared path because they provide inferior experience for pedestrians, especially when used by riders travelling fast as is likely to be the case here. Separated paths should be provided with access through to Adderstone Reserve and any housing built on part of the current reserve that is proposed for redesignation as residential land. I agree there is need for a safe means for pedestrians and cyclists to cross Aokautere Drive in the vicinity of Adderstone Reserve but dropped kerbs and a median island are unlikely to provide an adequate level of safety unless measures are taken to lower speeds on Aokautere Drive. The whole length of Aokautere Drive from Summerhill Drive to Johnstone Drive should be seen as an urban road with high levels of development on both sides and so the speed limit should be set accordingly. Safety is more important than travel time savings. A raised crossing point would help lower speeds and increase safety, perhaps with an on-demand signalised crossing point.

I seek PNCC to ensure separate paths are provided for pedestrians and cyclists and provide adequate measures to ensure safe crossing of Aokautere Drive for them.

- the ninth bullet point concerning bus services

- I support the introduction of high frequency bus services to serve the Plan Change area but it needs to be introduced ahead of further development so that people can choose to use it right from the time they move into the area when new habits are most easily formed.

SO 43-11

This will help achieve higher patronage and decrease private motor vehicle traffic.

I seek PNCC to advocate to MWRC to establish a high frequency bus service to the area before further development takes place.

- the tenth point concerning facilitating cycling between the plan change area and the rest of the city.

- I support this. Creating and maintaining an unobstructed cycleway from Johnstone Drive to the Fitzherbert Bridge would be a good start instead of what exists currently which is often blocked by parked cars, forcing cyclists out into the motor vehicle lane.

I seek PNCC to declare a special vehicle lane for cyclists and micromobility users from the Johnstone Drive/Aokature Drive intersection to the Fitzherebert Bridge.

Thanks Michael.

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Regards Chris

SO 44-1


Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Sonya
Last name	Park
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment ; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Public Notice of proposed district plan change G: Aokautere urban growth Aokautere Structure Plan Map7A.3E (Adderstone Reserve Alternative) Stormwater Management Strategy

SO 44-2

My submission is:	<p>Sonya Park</p> <p>Manager – Democracy & Governance Palmerston North City Council The Square Palmerston North 4410</p> <p>submission@pncc.govt.nz</p> <p>5th September 2022</p> <p>Public Notice of proposed district plan change G: Aokautere urban growth</p> <p>Aokautere Structure Plan Map7A.3E (Adderstone Reserve Alternative)</p> <p>Stormwater Management Strategy</p> <p>I wish to have amended the D1-D5 multi-unit housing proposal.</p> <p>The Tutukiwi Reserve stream runs adjacent to my property border and in periods of moderate to heavy rainfalls, the water has increased from a 3-metre stream into a 20-metre torrent and has at times, submerged the whole corner of the Tutukiwi Reserve bordering my fence line. In these instances, the 3-metre stream becomes a 50-meter flood plain.</p> <p>On 23rd August 2022, the Tutukiwi Reserve car park was fully underwater after one night of heavy rain and the Tutukiwi Reserve stream does flood regularly after only moderate rainfall.</p> <p>The proposed D1-D5 Multi unit dwellings are positioned on the borders of gullies that flow water into the Aokautere Church stream, the Moonshine Valley Reserve stream and the Tutukiwi Reserve stream.</p> <p>The Adderstone Reserve public walkway is already showing signs of erosion, making it dangerous for the public to enjoy this communal area.</p> <p>The walking planks over the stream in Hokonui Heights have been washed away in the recent rain events due to the increasing rainfalls we are experiencing.</p> <p>Before any proposed development has begun, the gully's surrounding Moonshine Valley and the streams within the valley are having to cope with naturally increasing rainfalls.</p>
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SO 44-3

	<p>Stormwater runoff after the proposed development will exacerbate the erosion and the demands of the streams and gullies will worsen due to this proposal diverting storm water into the Moonshine Valley catchment area.</p> <p>First photo (floodpic1) taken August 2020, showing Tutukiwi stream flooding across Tutukiwi reserve and lapping at my boundary fence.</p> <p>Second photo (floodpic2) is the Tutukiwi carpark under water, taken on the 23rd August 2022, after one night's rain.</p> <p>Regards</p> <p>Sonya Park</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>I suggest moving the D1-D5 Multi Unit Housing sites further away from the gullies that feed the Tutukiwi Reserve stream, Aokautere Church stream and the Moonshine Valley Reserve stream.</p>
<p>Supporting information</p>	<p>floodpic1.docx floodpic2.docx</p> 

SO 44-4



Hearing

I wish to be heard in support of my submission	No
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If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes
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SO 45-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Privacy s7(2)(a)
Last name	Privacy s7(2)(a)
Postal address	
Email	
Phone	
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	See attached.
My submission is:	See attached.
I seek the following decision from Palmerston North City Council	See attached.
Supporting information	form-5.pdf 212018 - Plan Change G - PNIRD Submission.pdf 1 - Stage 9 Scheme-OVERALL.pdf
Hearing	

SO 45-2

I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 45-3
SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, the Reserves Act 1977 and the Resource Management Act 1991, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

For more information, see our privacy statement, pncc.govt.nz/privacy

Submissions close
4pm, Monday 5 September 2022

Mailing to:

Palmerston North City Council
Private Bag 11-034, Palmerston North
Attention: Democracy & Governance
Manager

Delivering to:

Council's Contact Services Centre
Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name

Last name

Postal address

Email

Phone / Please provide a daytime contact number

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes

No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

Yes

No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

SO 45-4
SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

I seek the following decision from Palmerston North City Council / Give precise details



Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes

No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes

No

Signature

Date

A signature is not required if you make your submission by electronic means.

212018
COP

5 September 2022

Palmerston North City Council,
Private Bag 11034,
Manawatū Mail Centre,
Palmerston North, 4412

Attn: Michael Duindam,

Dear Michael,

Palmerston North Industrial and Residential Developments Ltd Submission on Proposed Plan Change G

Resonant Consulting have been engaged by their client, Palmerston North Industrial and Residential Developments Ltd (PNIRD), to prepare a submission on their behalf in partial support of Proposed Plan Change G (PPC:G) which wholly affects our client's property held in Record of Title 989936. We support the overall intent of Plan Change G, which seeks to release immediate housing supply in a way which creates a vibrant, well-connected community that is sensitive to the unique Aokautere landscape.

The proposed plan change will rezone a portion of the Aokautere area, amend provisions of the Operative District Plan, and also implement a structure plan affecting established development, and future development.

Background

PNIRD have, and are currently, undertaking residential and rural-residential development within Aokautere via staged subdivision, primarily around Valley Views, Pacific Drive, Atlantic Drive and Tuscany Way.

They have been identified as being one of three major landowners affected by the proposal. PNIRD have ownership interests in the Plan Change area, but would not gain advantage in trade competition as a result of the requests made herein.

That area of the site owned by the submitter shall be referred to as the 'Green Block' for the purposes of this submission.

Key Concerns

As noted earlier, the submitter is in general support of the imposition of the Structure Plan for the area, and minor amendments to current zoning provisions. However, there are aspects of PPC:G where relief is sought.

Land Transport Provisions/Roading Network

Of critical concern is the roading network shown on the Structure Plan. The landowners are required to give effect to and fund the roading layout shown on the Structure Plan, prior to undertaking any development within the Plan Change Area. Thus, we oppose both the timing of construction requirement, and the configuration of the roading shown.

We support the implementation of the Structure Plan for the Aokautere area, but seek modification of the internal road layout - specifically to reconfigure the dog-leg within the proposed rural road, adjacent to the termination of Valley Views Road, and provide a straight alignment in this location. Our client has concerns regarding the safety of this alignment, considering the road geometry in this location combined with the speed environment of rural roads. To this end, we request modification to the scheme plan to amend the configuration of this road.

We also seek the 'boulevard' within the residentially zoned portion of the Green Block is removed, and replaced with a conventional local road cross section. It is unclear what the purpose of this boulevard is, particularly in this suburban low-density location.

Our client also seeks the inclusion of a *notional* road connection to Turitea Road from the Green Block, rather than relying solely on a connection being provided by another landowner, from the southernmost block.

It is considered that the break in the Valley Views Road shown on the proposed Structure Plan is at odds with the environmental outcomes sought by the Plan Change, for connectivity and avoidance of long cul-de-sacs. It is sought this break in the road is removed, allowing for continued flow of traffic through the development area and avoidance of a lack of connectivity throughout. The scheme plan to be provided with the application to Council for "Stage 9" of the Valley Views subdivision is sought to be included within the Structure Plan (attached). It is further requested that the Structure Plan is amended in accordance with the approved subdivision, being Stage 8 of Pacific Drive, with Council reference SUB 6267.

Finally, the submitter opposes the requirement for transport infrastructure to be completed prior to development, and the Non-Complying activity status proposed for applications which do not achieve this, as set out in Objective 5, Policy 5.10, R7A.5.2.2, and R10.6.5.6.

Vesting of Gullies

The submitter supports, in principle, the acquisition of gullies by PNCC for conservation and amenity purposes. However, PC:G requires that gullies are vested at the earliest subdivision opportunity, with little to no regard for how these will be accessed by Council for maintenance, enhancement, and installation of public access infrastructure. It is sought that Objective 6 and Policy 6.6 be reworded to allow for gullies instead to be vested where they are contiguous to an area of land sought to be developed.

Zoning of Rural Land

The submitter opposes the Rural Zoning of those eastern-and-westernmost portions of the Green Block and requests they be included within the Rural-Residential overlay also. The operative District Plan has a directive policy framework which seeks to avoid the creation of undersized rural land parcels such as those proposed, and affords a non-complying activity status to subdivisions of this nature. Further, the information requirements for subdivisions for undersized rural land parcels involve invasive soil investigations and extensive reporting which would not correspond with the scale of effects in this location.

The absence of the word 'or' between the policy provisions of Policy 3.2, and non-complying activity status for subdivisions of this effect are considered to pose great risk to the resource consenting process and giving effect to the Structure Plan; particularly as PNCC have, on occasion, expressed apprehension around the precedence effect that may be created across the City should they approve subdivisions for rural land below 20ha.

We reiterate that these rural areas should be included within the rural-residential overlay so as not to frustrate the resource consenting process, and to better reflect their location within a peri-urban environment.

Financial Contributions

Although not expressly provided for in the Plan Change document, the submitter wishes to take this opportunity to note that they have made significant financial contribution to PNCC for safety upgrades to occur at the intersection between Turitea Road and Valley Views, which have not been provided by the Council. To this end, the submitter would seek roading 'credits' be applied to their development when calculating development contributions payable.

General Comment

Overall, the submitter is supportive of the implementation of a Structure Plan by Council, and the environmental outcomes sought for the Aokautere area. Minor amendments are sought to the Structure Plan, notably to amend the proposed internal road network and extend the rural-residential overlay over the eastern and westernmost portions of the Green Block.

Planning provisions requiring immediate vesting of gullies and the completion of roading upgrades prior to any development are opposed, and it is sought instead for roads and gullies to be created and vested incrementally.

The submitter wishes to be heard in support of this submission. Where other submitters make a similar submission, we are amenable to presenting a joint case with them.

Yours faithfully,



Privacy s7(2)(a)

Privacy s7(2)(a)



SO 45-9



0 50 100 150 200 250 300

A1 ORIGINAL SIZE

<p>The Contractor shall check all dimensions on site. 71 1/8" Scale, 95.000' (290.000') 10.300' (30.900')</p>		<p>DO NOT SCALE. If in doubt, ask for dimensions. Scale A1 Scale A3</p>		<p>Job No. 212018</p>	
<p>Surveyed 7/1/2022</p>	<p>Drawn JMW</p>	<p>Checked NSJ</p>	<p>Date 08/21/2022</p>	<p>Scale 1:400</p>	<p>Sheet 1</p>
<p>PROPOSED SUBDIVISION 277 VALLEY VIEWS PALMERSTON NORTH OVERALL LAYOUT OF STAGE 9</p>			<p>PNIRD</p>		
<p>1</p>	<p>1</p>	<p>7</p>	<p>1</p>	<p>7</p>	<p>1</p>

SO 46-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Michael
Last name	Poulsen
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Stormwater management strategy
My submission is:	Overall agree with most conclusions in the GHD report except for the maximum rainfall rates being used as recent events would suggest they are too light even using the 1 in 100 year events. Being a farmer and fertiliser consultant with experience of the effects of management, inadequate infrastructure and climate on the physical soil environment, we need to protect our soils and soil biology and the linked water systems as much as we can. With regards to the overall area their needs to consideration of the ratio of unpaved area to paved with the need for the breakup and minimisation of large paved areas to avoid the ability of collection of large volumes of water turning into uncontrollable torrents. As alluded to in the report infiltration rates are not high on this soil type but still need to be allowed for. On a per house basis the ratio of paved to unpaved or permeable ground cover also needs to be considered together with the use of rainwater tanks and greywater systems all helping to improve the efficiency of our water demand and usage and or disposal.

SO 46-2

I seek the following decision from Palmerston North City Council	
Supporting information	
Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 47-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	On behalf of the Pasifika Reference Group - Privacy s7(2)(a)
Last name	Privacy s7(2)(a)
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Aokautere Urban Growth
My submission is:	<p>As proposed, the PNCC are rezoning part of Aokautere to residential area from the current rural designation. This will bring more opportunities for our Pacific people to find access to other areas of Palmerston North to reside. This will also provide opportunities for work and schooling for their families in this new zoned area. Currently opportunities to live in new areas has not been an option as they are financially out of reach for many Pacific Families. Providing options for PNCC housing has also become difficult for many Pacific Families as they find the application process difficult and/or the options for housing are in areas that are less desirable. Plus in some cases families have struggled to meet the criteria.</p> <p>As with all cultures, Pacific families have aspirations to live in a range of areas in the city and have access to all the beautiful reserves, and other amenities the city has to offer. We support this rezoning proposal as it creates more opportunities for our city.</p> <p>We also think that the Adderstone Reserve has the potential</p>

SO 47-2

	<p>for a purpose built Pacific Centre. Currently the Pasifika Community Centre is housed at Bill Brown Park which is too small and doesn't have the kitchen facilities to cater for the groups who use the centre. Adderstone Reserve could provide the opportunity to have purpose built facilities and also to create the opportunity for other businesses to be in close proximity to the centre. This would also create a multicultural hub in Aokautere with IPU being close by. The key aspect for council to consider would be looking at reducing the barriers to property access for Pacific families. This would require thinking about ways to enable equitable access for Pacific families which could lead to home ownership, not just by increasing the housing stock but actively planning with the Pacific Community to explore that Pacific people can become homeowners in new residential areas.</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>That the Council recognise the difficulty Pacific people experience in finding options for housing in newly developed areas and create equal/equitable opportunities for Pacific people to access these opportunities through:</p> <ol style="list-style-type: none"> 1) Building Council owned properties in these new areas that meet the needs of our Pacific families. 2) Providing assistance for Pacific families to apply for these properties in the way of interpreters, legal advice etc. 3) Rezoning Adderstone Reserve and looking at the feasibility of a new Pasifika Community Centre to be housed on that site. 4) Identifying an area which could be designated for a Pacific provider to develop housing which meets the needs of our Pacific community.
<p>Supporting information</p>	
<p>Hearing</p>	
<p>I wish to be heard in support of my submission</p>	<p>Yes</p>
<p>If others make a similar submission, I will consider presenting a joint case with them at a hearing</p>	<p>Yes</p>

SO 48-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Bruce and Marilyn
Last name	Bulloch
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	The whole Proposed Plan Change G.
My submission is:	<p>In principle we support Plan Change G for the following reasons:</p> <ul style="list-style-type: none">• Having a comprehensive plan is far more desirable than piecemeal development driven by individual developers who may be tempted by short-term expediencies.• Taking the gullies into Council ownership and managing them as a coherent system will enable them to be exploited as landscape features.• The range of documentation provided in support of the Plan Change indicates an overall vision, the foreseeing of many of the contingencies, and the District Planning Rules that desirable outcomes will entail.
I seek the following decision from Palmerston North City Council	That Plan Change G proceed through the consultation and hearing phases so that its provisions can be assessed in detail.
Supporting information	PNCC - Submission on Plan Change G Sept.pdf

SO 48-2

Hearing	
I wish to be heard in support of my submission	No
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO - 48-3

Submission on Plan Change G: Aokautere Urban Growth

Our interest in the Plan Change G: Aokautere Urban Growth, stems from the following:

- We are former residents of the Aokautere area (Pinfold Road)
- Bruce worked at the Soil Conservation Centre, Aokautere.
- Bruce was trained as a native plant botanist
- Bruce advised International Pacific College on tree and shrub plantings
- Bruce discussed with one of the authors a former report on Subdivision on the Aokautere terraces, prepared by the Ministry of Works Town Planning Division for the Kairanga County.

Undoubtedly urban development practitioners will have more in-depth comments to make on aspects of the Plan Change, and we look forward to reviewing these and reserve the right to support or oppose them in due course.

Bruce and Marilyn Bulloch.

Note: Under separate cover have also submitted on the Adderstone Reserve and we oppose any alteration to its Reserve status.

SO 49-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Gill
Last name	Welch
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely affects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	All building plans close to Moonshine valley boundary
My submission is:	<p>I wish to voice my objections and concerns regarding the proposals expected to take place alongside my property and others on Moonshine Valley Road.</p> <p>Firstly I would like to point out that I feel that these proposals appear to be somewhat hidden, from those of us who will feel most impact, due to the sheer length and complexity of the documents. I feel that the council should at the very least, hold a meeting for those of us to be directly impacted from these proposed changes, and in addition, also a site visits needs to be undertaken so that any of our very really concerns can be addressed and observed real time.</p> <p>Secondly Moonshine has always had a special status as a lifestyle environment, and the council appear to have given zero consideration for this fact given that the council deems it</p>

SO 49-2

appropriate to allow the construction of 11 meter high density flats along our border. The absurdity of this, choosing to place this type of housing next to idyllic lifestyles, almost beggars belief. This is the type of housing that is undoubtedly best suited to inner city developments and not on the fringes of town adjoining country properties. Development gone mad.

Along with noise pollution, and the visual pollution, there will be impact on the nature that the Moonshine residents have fought so hard to protect. Moonshine has made great strides to become predator free and to protect our bird life/wildlife. This development will bring the risk of more cats and escaped dogs endangering the nature that abounds. I can see our livestock being adversely affected by such things as fireworks, loud noise etc, which they have not had to endure before which is why we bought here. We all believed that because of the gully and the lay of the land, and the special status that Moonshine holds a subdivision such as this could not happen.

The gully that is on my neighbours property has already suffered substantial and sustained damage due to the subdivision already in place. My neighbours land is deteriorating due to the abnormal amount of water running off the subdivision and down the gully carving out massive erosions and bank collapses, and no one has shown any concern to the damage being caused to someone else's property. Other land on Moonshine is also suffering the same fate.

I believed that the council had an obligation to ensure that no new subdivision should have a detrimental effect on an existing one, this certainly has not been adhered to concerning my neighbours property, and I see the same thing continuing with these council proposals.

The proposals of ponds or some sort of stormwater retention on my border is of huge concern to us, given the damage explained and observed and "Ignored" in my previous paragraphs. We have zero faith that the excess water produced and also the diverted natural water course due to this development will have no impact on our land. The land that we own bounding the subdivision is bone dry throughout all seasons, it has always been this way. We fear this will not be the case with this intensive housing on our borders. We also have large trees growing on this land. If our land does not retain its status quo then these large trees will become at risk. New water running onto our land or soaking into it because of this intensive development will undermine the tree roots and will increase the likelihood of them falling.

We are also informed that these 3 storey intensive 11 meter

SO 49-3

	<p>high buildings will only have a 5 meter setback and not even a the 15 meter setback as in the Turitea Valley subdivision. Why is this? The visual impact will destroy our Valley.</p> <p>My final comments are that the developer that owns this land, I know, would not like 11 meter 3 storey homes next to their lifestyle home and they have a choice not to destroy others peoples homes. Life isn't always about making money at the expense of others, just because the council may end up deeming that they can doesn't mean that they should.</p> <p>Please leave this type of housing where it belongs, and it certainly is not next to the peaceful setting of lifestyle properties. I cannot think of a more inappropriate place to build high density housing. Sheer madness.</p>
I seek the following decision from Palmerston North City Council	Redesign in coordination/sympathy with views of affected Moonshine valley residents.
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 50-1

Palmerston North City Council

Private Bag 11034

Palmerston North 4410

ATTENTION: Democracy and Governance Manager

5/09/2022

Submission on Plan Change G: Aokautere Growth Area

Full Name of Submitter:	Palmerston North City Council
Plan Change Name:	Plan Change G: Aokautere Growth Area
Physical Address:	The Square, Palmerston North
Postal Address:	Private Bag 11034, The Square, Palmerston North
Phone:	06 356 8199

1. This is a submission by the Palmerston North City Council ("**Council**") on the "Aokautere" plan change proposal. The Palmerston North City Council is entitled to make a submission pursuant to cl 6 of schedule one of the Resource Management Act 1991.
2. Council does not consider that it can gain an advantage in trade competition through this submission.
3. Council wishes to be heard in support of this submission but does not wish to consider presenting a joint submission at any hearing.
4. The purpose of this submission is to request changes to the notified plan change to:
 - a) improve District Plan clarity.
 - b) better align provisions with the intended plan change outcomes.
 - c) fix minor errors that have become apparent post-notification.
5. The specific provisions of the Plan Change this submission relates to are as follows:

	Plan Provisions	Submission	Decision sought
1	Various	Not all tracked changes shown on chapter contents pages.	That the contents pages for each District Plan chapter affected by Plan Change G be amended to show tracked changes where proposed changes are promoted.
Maps			
2	Map 10.1A	Map 10.1A has poor resolution, which may make it difficult to interpret.	That an updated, higher resolution map be included. Amended Map 10.1A is attached as Appendix 1.
3	Map 10.1A	Map 10.1A uses a different map key from the definitions used in the proposed provisions. The key needs to include a notation to illustrate that classes A and B are 'developable' and classes C, D and E are 'limited developable' This will ensure clear delineation of 'developable' and 'limited developable' land for the purpose of the proposed provisions.	Change key to define Classes A+B as "Developable Land" and Classes C, D and E as "Limited Developable Land" Amended Map 10.1A is attached as Appendix 1.
4	Structure Plans	The key on the Aokautere Structure Plan creates confusion because it uses the label 'Aokautere Residential Area', and this is shown as being only the areas delineated in orange, when according to the proposed definition, it applies to the whole of the Greenfield Area. A change to the Definition for Aokautere in Section 3 is suggested so that it reads Aokautere Greenfield Residential Area. This would provide greater clarity to plan users and ensure that the different features within the Aokautere Structure Plan can be more easily delineated.	That the Definition for Aokautere Residential Area be amended as follows: <u>Aokautere Greenfield Residential Area</u> <u>means the Greenfield Residential Area shown in the Aokautere Structure Plan.</u> That Map 7A.4D be amended so that the Street Cross Sections reference reads 7A.4D 1 -17

		<p>The alignment of the Abby Road extension in the structure plans needs a minor adjustment to align with the Notice of Requirement for Abby Road.</p> <p>Map 7A.4D contains a minor error in the reference number for the Street Corss Sections, where it is recorded as 7A.3D 1 -17 instead of 7A.4D 1 – 17.</p>	<p>That the structure plan be amended to align the Abby Road extension with the Notice of Requirement for Abby Road.</p> <p>That any consequential amendments to the Structure Plan also be made.</p>
5	Zoning maps	<p>The wetland feature and crescent shaped park in the local neighbourhood centre is showing as being zoned residential, but it will be zoned Recreation. The recreation reserve space on the “Voss” block is showing as Conservation and Amenity, but the portion fronting the road should be zoned recreation. The zoning needs to be corrected to align with the Aokautere Structure Plan.</p> <p>The notified map shows two Rural parcels adjacent to Turitea Rd with opacity applied over them in error. It can be implied that they are rural, which is consistent with other parcels outside of the structure plan area. For clarity sake, the map should be amended to clearly show that they are Rural Zone.</p>	<p>That zoning should be amended to reflect the Aokautere Structure Plan.</p> <p>An amended Zoning Map is attached as Appendix 2.</p>
Definitions			
6	Developable Land (new)	<p>The definition for Developable Land should include an “or” rather than “and” to be consistent with the inserted text for the definition of ‘limited development’.</p>	<p>Amend definition for Developable Land as follows: (changes to notified provisions shown in grey)</p> <p>Developable Land means any land in Aokautere:</p>

			<p>a. that is identified as developable in Map 10.1 and <u>Map 10.1A</u>: or</p> <p>b. for which any land instability, erosion or subsidence hazard associated with the land will be avoided or mitigated by specifically designed geotechnical engineering works for which a valid, restructured land resource consent exists. In relation to the establishment of buildings and structures, the works required by the restructured land resource consent must have been completed.</p>
7	Developable Land (new)	The definition for Developable Land should include an “or” rather than “and” to be consistent with the inserted text for the definition of ‘limited development’.	<p>Developable Land means any land in Aokautere:</p> <p>a. that is identified as developable in Map 10.1 and <u>Map 10.1A</u>: or</p> <p>b. for which any land instability, erosion or subsidence hazard associated with the land will be avoided or mitigated by specifically designed geotechnical engineering works for which a valid, restructured land resource consent exists. In relation to the establishment of buildings and structures, the works required by the restructured land resource consent must have been completed</p>
8	“ARI”	“ARI” term is used in proposed provisions, but is not defined.	<p>Insert a new definition for Average Recurrence Interval (ARI) as follows:</p> <p>Average Recurrence Interval (ARI) <u>means the average time period between floods of a certain size. For example, a 100-year ARI flow will occur on average once every 100 years.</u></p>
7: Subdivision			
9	Objective 3	Objective 3 does not explicitly address natural hazards but the proposed policies to be inserted	Amend Objective 3 as follows: (changes to notified provisions shown in grey)

	<p>under it do. A more obvious cascade link between the policies and the objective is necessary.</p>	<p>OBJECTIVE 3 To ensure that subdivision of land and buildings in rural areas is consistent with integrated management of the use, development and protection of land and other natural and physical resources and</p> <ul style="list-style-type: none"> • retains Class 1 and Class 2 versatile soils for use as production land • retains the productive capability of rural land and recognises the valuable contribution made by class 3 soils • enables small landholdings for intensive horticulture activities in the Flood Protection Zone • provides for limited rural residential development on land which contains less versatile soils • maintains the low density development pattern in the Moonshine Valley Rural Residential Area • <u>requires development to be in general accordance with any relevant Structure Plan</u> • provides for efficient and effective on-site services and regular maintenance • avoids connection to the City's reticulated infrastructure network and consequential impacts on network efficiency and the extension and/or upgrade of the infrastructure network, including the road network and pressure sewer systems • preserves or enhances rural character • avoids reverse sensitivity effects • enables the acquisition or disposal of land for network utilities, public works and quarrying
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			<ul style="list-style-type: none"> • <u>protects, restores and enhances the gully network in Aokautere.</u> • <u>Avoids, remedies or mitigates the risks and effects of natural hazards</u>
10	R7.15.4.1.4	<p>A minor grammatical amendment is suggested to improve plan clarity. It is submitted that R7.15.4.1.4 should replace “and” with “or” where the Aokautere Structure Plan is being referenced.</p>	<p>That R7.15.4.1.4 be amended as follows: (changes to notified provisions shown in grey)</p> <p>7.15.4 RULES: NON-COMPLYING ACTIVITIES R7.15.4.1 Non-Complying Activities ... 4. Any subdivision which does not comply with the Restricted Discretionary Activity Performance Standard for Minimum Lot Area (R7.15.2.1(b)(i), (ii) and (iii)) and Subdivision in the Rural-Residential Area identified on the Aokautere Structure Plan (R7.15.2.1(f)), is a Non-Complying Activity.</p>
7A Greenfield Residential			
11	7A.1 Introduction	<p>This section needs to also reference all the other maps in the Aokautere Structure Plan to avoid confusion and inconsistency with definitions of Greenfield Residential Area and the Aokautere Residential Area as currently shown on the Aokautere Structure Plan.</p>	<p>Amend Section 7A.1 Introduction as follows: (changes to notified provisions shown in grey)</p> <p>7A.1 Introduction Subdivision is a process to enable the separate ownership of land and the registration of interests in land. Subdivision of land is defined by the Resource Management Act 1991.</p> <p>This section enables greenfield development within:</p> <ul style="list-style-type: none"> • The Whakarongo Residential Area (Map 7A1) • The Kikiwhenua Residential Area (Map 7A.2)

			<ul style="list-style-type: none"> The Aokautere Residential Area (<u>Map 7A.4, 7A.4A, 7A.4B, 7A.4C, 7A.4.D</u>) <p>These areas were identified for residential growth in the Palmerston North City Development Strategy 2017.</p> <p>The provisions within this section require well designed, attractive and functional communities within the Greenfield Residential Areas. The Structure Plans for each Greenfield Residential Area will direct subdivision and provides for neighbourhood centres and public open spaces. A mix of activities and densities are provided for which will assist with achieving a variety of living choices and diverse communities.</p> <p>That the Aokautere Structure Plan be updated to include reference to the Aokautere Church Stream, Moonshine Valley Reserve Stream and Tutkiwi Reserve Stream.</p>
12	Policy 4.7	Policy 4.7 refers to the Aokautere Church Stream, Moonshine Valley Reserve Stream and Tutkiwi Reserve Stream "as shown on the Aokautere Structure Plan" but these are not illustrated on the relevant structure plans. The Aokautere Structure Plan should be updated to include these features.	
13	Policy 4.8	Policy 4.8 includes a reference to 'stormwater ponds' and notes that these are referenced on the structure plan. The structure plan only refers to these as stormwater ponds.	<p>That Policy 4.8 is amended as follows:</p> <p>(changes to notified provisions shown in grey)</p> <p><u>4.8 To require the design and management of stormwater to incorporate the stormwater management areas, and stormwater detention ponds shown on the Aokautere Structure Plan</u></p>
14	Policy 5.8	The policy refers to the provision of roads identified on the Aokautere Structure Plan but the intent (as	<u>Amend Policy 5.8 as follows:</u>

	<p><u>(changes to notified provisions shown in grey)</u></p> <p><u>To ensure that the design and layout of any subdivision and development provides for the transport network identified on the Aokautere Structure Plan in a manner which:</u></p> <ul style="list-style-type: none"> • <u>Achieves an accessible and permeable grid like pattern of development as shown on the Aokautere Structure Plan</u> • <u>Delivers a safe, legible and effective movement network which conforms to the One Network Framework and reflects Aokautere’s hierarchy of street types (Map 7A.4A) and cross-sections (Map 7A.4D)</u> • <u>Avoids or minimises adverse effects on the safe and efficient operation, maintenance and access to network utilities and the transport network</u> • <u>Produces a fine-grained network of streets that provide:</u> <ul style="list-style-type: none"> a. <u>permeable and connected neighbourhoods;</u> b. <u>a choice of pathways; and</u> c. <u>access from two directions for most households.</u> • <u>Complements the street network with a web of trails in the gully reserves</u> • <u>Provides circuits of varying length for walking, jogging and cycling</u> • <u>Encourages active travel modes</u> • <u>Provides a highly connected street layout which integrates with the surrounding transport network</u>
<p>also described in the policy) is to deliver the transport network including cycle and walking routes/paths. There is also potential repetition between this policy, and policy 5.12, and officers suggest including 5.12 into that policy.</p>	

15	R7A.5.2.2(a)(xv) ii)	This standard should also refer to Map 7A.4E which also shows the 5 metre no build setback	<p><u>and includes pedestrian access, cycleways and recreational trails which link to open space corridors</u></p> <p>That Policy 5.12 be deleted and that the numbering for subsequent policies be updated to reflect this.</p> <p>Amend R7A.5.2.2(a)(xvii) as follows: (changes to notified provisions shown in grey)</p> <p><u>(xvii) how the subdivision proposal provides for the establishment and maintenance of the 5 metre no-build setback identified on the Aokautere Structure Plan (Map 7A.4 and Map 7A.4.4E)</u></p>
16	R7A.5.2.2 (d)(iii)	References to 'contiguous developable land' should be amended to read 'contiguous Developable Land' to recognise that Developable Land is a defined term in Section 4: Definitions.	<p>Amend R7A.5.2.2(d)(iii) as follows: (changes to notified provisions shown in grey)</p> <p><u>(d) Lot Size</u></p> <p>⋮</p> <p><u>(iii) In the Aokautere Residential Area, no single lot shall be:</u></p> <ul style="list-style-type: none"> • <u>Less than 400m² of contiguous dDevelopable Land within the Suburban Density Areas shown on the Aokautere Structure Plan, with the average area of lots available for residential purposes being at least 600m². In calculating the average lot area, no lots over 1000m² shall be included.</u>

<p>17</p>		<p>R7A.5.2.2 (d)(iii)</p>	<p>refers to 'contiguous developable land' – is this 'Developable land' as per the definition? (I note above that sometimes this term is capitalised in the plan, other times it is lower case, as per this ref.</p> <p><u>Less than 150m2 within the Medium Density Areas shown on the Aokautere Structure Plan, with the average minimum number of dwellings being 25 per hectare.</u></p> <p>(d) Lot Size</p> <p>...</p> <p>(iii) In the Aokautere Residential Area, no single lot shall be: Less than 400m2 of contiguous developable land within the Suburban Density Areas shown on the Aokautere Structure Plan, with the average area of lots available for residential purposes being at least 600m2. In calculating the average lot area, no lots over 1000m2 shall be included.</p> <p>Less than 150m2 within the Medium Density Areas shown on the Aokautere Structure Plan, with the average minimum number of dwellings being 25 per hectare.</p>
<p>Chapter 10 – Residential Zone</p>			
<p>18</p>	<p>Policy 11.3</p>	<p>This policy should also refer to Map 7A.4E which also shows the 5 metre no build setback.</p>	<p>That Policy 11.3 be amended to include reference to all relevant Aokautere Structure Plans, as follows:</p> <p>(changes to notified provisions shown in grey)</p> <p>11.3 To ensure buildings, structures and landscaping are not located in the 5 metre no build setback identified on the Aokautere Structure Plan (Map 7A.4 & 7A.4E) to protect against the risk of natural hazards.</p>
<p>19</p>	<p>Rule R10.6.1.1(g)</p>	<p>Plan Change G has introduced street typologies into the Structure Plans, which are consistent with Waka Kotahi's new One Network Road Classification (ONRC). The Operative Plan in Section 20: Land Transport uses outdated terminology for road typologies. Many of the operative typologies share</p>	<p>That Section 20.6 Roading Hierarchy be amended to include the following Note to Plan Users:</p> <p>...</p> <p>Note to Plan Users</p>

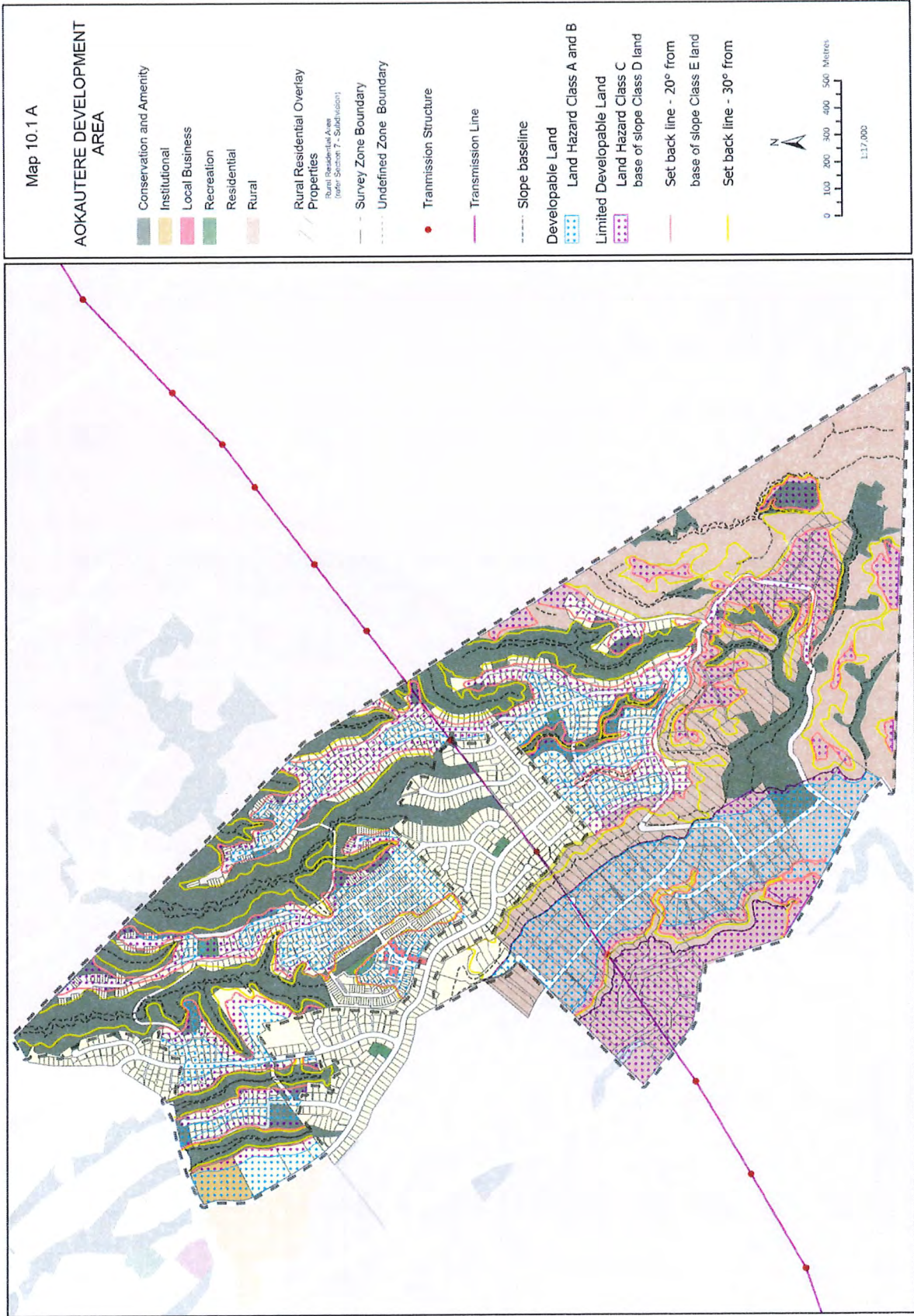
		<p>characteristics with the ONRC versions. Council intends to undertake a future plan change to reclassify the street types to align with the ONRC. In the meantime, there is a mismatch between the terminology in the Aokautere Structure Plan and Section 20: Land Transport. This has potential implications for how Vehicle Access provisions are assessed under R10.6.1.1(g). Council considers that there is benefit in retaining the ORNC terminology referenced in Plan Change G, so that it is set up to respond to the new network classification when it is implemented. Until a full implementation of the ONRC is promoted a transitional approach is suggested to be taken in Aokautere. This could be achieved through adding a new explanatory note in Section 20.6 that details how the following road types in Map 7A.4D1-17 be interpreted.</p>	<p><u>For the purpose of interpreting Map 7A.4D1-17 the following road typologies are to be assessed as follows:</u></p> <ul style="list-style-type: none"> - <u>Urban connectors shall be considered Collector Roads, except Pacific Drive which is considered a Minor Arterial</u> - <u>Activity Streets shall be considered Pedestrian Streets</u> - <u>Local Streets shall be considered Local Roads</u> - <u>Peri-urban roads shall be considered Local Roads</u>
<p>20</p>	<p>Rule R10.6.3.3</p>	<p>A minor amendment is proposed to R10.6.3.3ix to clarify that the Aokautere Residential height, recession and setback requirements apply to area I. Deletion of the word “additional” for this performance standard heading is also requested as it is considered to be unnecessary.</p>	<p>Amend R10.6.3.3ix as follows: (changes to notified provisions shown in grey)</p> <p><u>x. Additional Height, recession and setback requirements in the Aokautere Residential Area (a) No building shall exceed 11m within Area I. (b) All buildings within Area HI shall be contained within a 45° plane commencing at 5m above ground level inclined inwards at right angles in plan for the front two thirds of the side boundary and 2.8m for the rear one-third of the side boundary (See Figure 10.2) unless it is located at the boundary of a Suburban Low</u></p>

<p>21</p>	<p>Rule R10.6.3.4</p>	<p>R10.6.3.4 contains an incorrect cross reference. It should refer to Map 10.6.3.3(i) instead of 10.6.3.3(h). Area (h) refers to Whiskey Creek.</p>	<p><u>Density allotment in which case the recession plan shown in Figure 10.1 applies.</u></p> <p>That R10.6.3.4 be amended to read as follows: (changes to notified provisions shown in grey)</p> <p>R10.6.3.4 Non-Notification of Multi- Unit Residential Development Activities in the Hokowhitu Lagoon Residential Area <u>and the Aokautere Residential Area</u></p> <p>Applications made for restricted discretionary consent applications under R10.6.3.3 for sites associated with Map 10.6.3.3(g) <u>and 10.6.3.3(hi)</u> must not be publicly or limited notified.</p>
<p>22</p>	<p>Rule 10.6.5.6 Transport Infrastructure (Aokautere Residential Area)</p>	<p>This is a proposed new rule, but is not shown underlined and bolded in the notified version of the Plan.</p> <p>The reference to R7A.5.2.2(i) is an error and should refer to (h).</p>	<p>That R10.6.5.6 be amended as follows: (changes to notified provisions shown in grey)</p> <p><u>R10.6.5.6 Transport Infrastructure (Aokautere Residential Area)</u></p> <p><u>Notwithstanding the activity status set out in R10.6.1.5 and 10.6.3.2, all development that occurs before the completion and certification of the works identified in R7A.5.2.2(ih), within the stipulated timeframes, shall be a Non-Complying Activity.</u></p>
<p>23</p>	<p>Rule R10.7.1.6</p>	<p>R10.7.1.6 is missing a reference to Map 10.1A.</p>	<p>That R10.7.1.6 be amended as follows:</p>

			<p>R10.7.1.6 Limited Development Land in the Aokautere Development Area</p> <p>The following are Permitted Activities on any land shown as Limited Development land in the Aokautere Development Area, as shown on Map 10.1 or Map 10.1A, provided they comply with the following Performance Standards:</p> <p>...</p>
<p>11:Business Zones</p>			
<p>11.10 Local Business Zone</p>			
<p>24</p>	<p>Policy 6.1</p>	<p>Policy 6.1 contains reference to providing for “retail and commercial activities”; however, retail activity has a specific definition in the District Plan which relates to the ‘Fringe Business Zone’ only. Therefore, policy 6.1 should be amended to provide for “local business activities”, thereby avoiding the risk of confusion with the specific definition applying to the Fringe Business Zone.</p>	<p>That Policy 6.1 be amended to read as follows: (changes to notified provisions shown in grey)</p> <p>POLICIES</p> <p>6.1 To provide for local serving-retail and commercial business activities in specific locations as identified on the Aokautere Neighbourhood Centre Precinct Plan (Map 7A.4C).</p>
<p>25</p>	<p>R11.10.3.1</p>	<p>A consequential amendment is needed in R11.10.3.1 to provide a non-compliance consenting pathway for the new performance standard R11.10.2.1 (g). Assessment (h) also needs to be corrected so that it references to R11.10.2.1 (g) instead of (d).</p>	<p>That R11.10.3.1 be amended as follows: (changes to notified provisions shown in grey)</p> <p>11.10.3 RULES: RESTRICTED DISCRETIONARY ACTIVITIES</p> <p>R11.10.3.1 Activities which do not comply with the Permitted Activity Performance Standards Activities which do not</p>

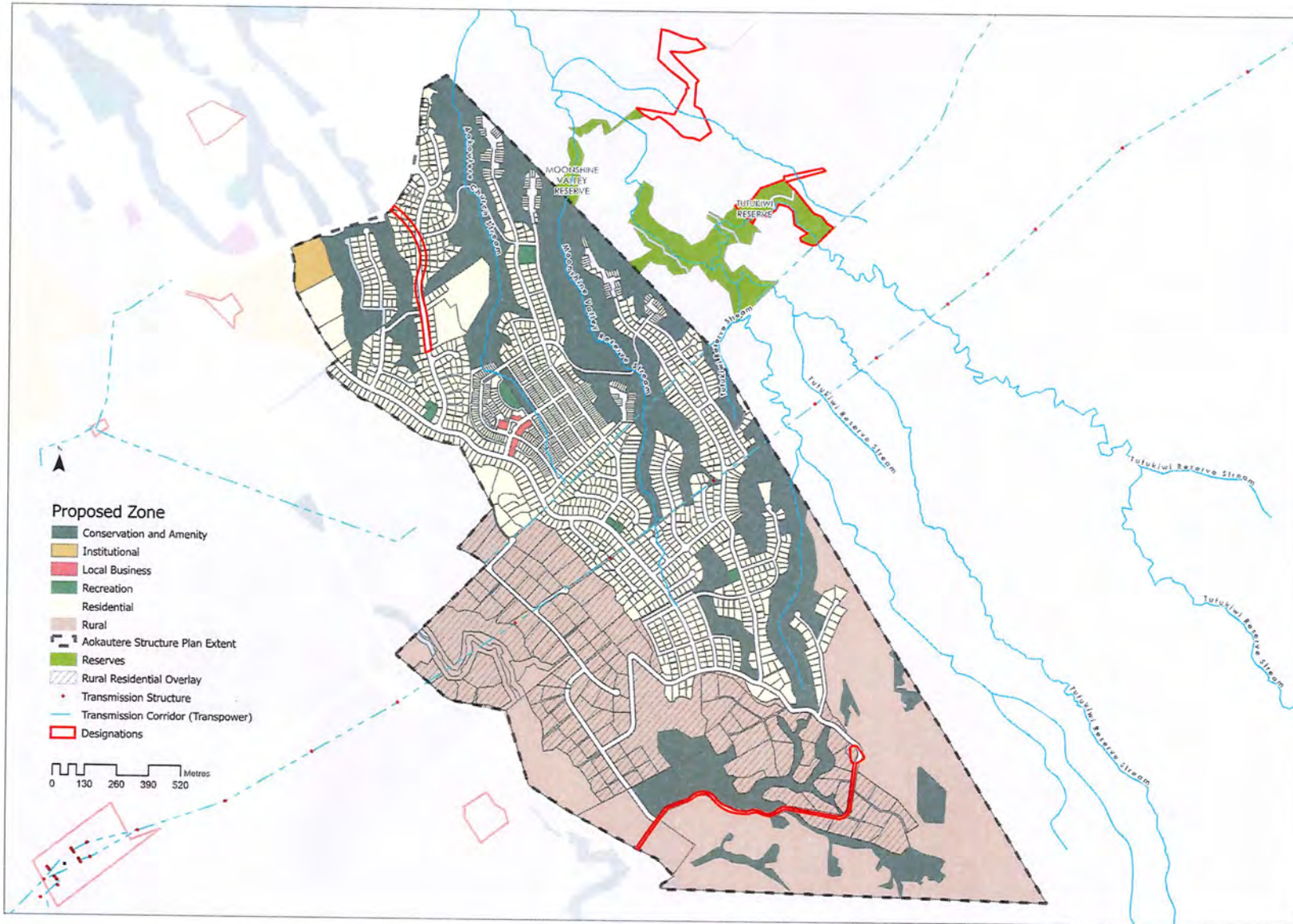
		<p>comply with the Permitted Performance Standards (in R11.10.2.1) in relation to:</p> <ul style="list-style-type: none">(a) Lighting(b) Screening(c) Size of Function(d) Residential Accommodation(e) Vehicle Parking(f) Loading and Access(g) Car Park Landscape Design(h) Servicing and Loading Hours(i) Signs <p><u>(j) Residential Activities in te Aokautere Neighbourhood Centre (Map 7A.4C)</u></p> <p>...</p> <p><u>(h) Residential Activities in the Aokautere Neighbourhood Centre</u> The assessment criteria contained in <u>R11.9.3.1(dg)</u></p>
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SO 50-15



Appendix 1: Amended Map 10.1A

Appendix 2 - Amended Zoning Map



SO 50-17

6. Summary of decisions sought:

The proposed plan change is supported by Council officers. However, the amendments set out above, or any considered by a decision-maker to have the same or similar effect, are sought as they are considered necessary for clarity, correction, and/or consistency with the plan change outcomes. Along with the specific relief sought in this submission, Council officers seek any other consequential amendments required for clarity or consistency in relation to the above matters. Further, consequential relief is also sought for any aspect of the plan change not specifically referred to in the table above where this amounts to minor edits to correct numbering, cross-references or minor errors.

Yours sincerely



Chris Dyhrberg
ACTING CHIEF EXECUTIVE
Palmerston North City Council

SO 51-1

BEFORE THE PALMERSTON NORTH CITY COUNCIL

Under the Resource Management Act 1991 ('the Act')

In the matter of **Palmerston North City Council's**
Proposed Plan Change G: Aokautere Growth Area

to the Palmerston North City Council
Operative District Plan

Heritage Estates 2000 Limited
("HEL")
The Submitter

Submission to the Palmerston North City Council
Proposed Plan Change G: Aokautere Growth Area
Dated 5 September 2022

SO 51-2

Submission to the Palmerston North City Council **Proposed Plan Change G: Aokautere Growth Area**, that is subject to public notification by the consent authority pursuant to Clause 6 First Schedule – Resource Management Act 1991

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

Name of Submitter: Heritage Estates 2000 Limited (“HEL”)

The Council notified **Proposed Plan Change G: Aokautere Growth Area**, on the Palmerston North City Council website, the submissions opened on the 8th of August 2022 and closed at 4pm on Monday the 5th of September 2022.

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

The submitter has a notified but unheard Private Plan Change B, it resides in the former City West area as part of the 2010 Residential Growth Strategy, now referred to by the Council as the Kākātangiata City Growth Area.

THE COUNCIL’S NOTIFIED DOCUMENTS ON THE PALMERSTON NORTH CITY COUNCIL’S WEBSITE ARE:

- [1] The notified documents for Proposed Plan Change G to the Palmerston North City Council Operative District Plan include over 960 pages of information. The notified documents are listed in **Attachment One** to this Submission.

HERITAGE ESTATES 2000 LIMITED SUBMISSION

- [2] Heritage Estates 2000 Limited (“HEL”) is the submitter¹ to the Council’s Proposed Plan Change G (“PC G”).
- [3] A good resource management practice requires that sufficient particulars are given in a concise and transparent manner to enable those who might wish to make submissions on PCG to be able to assess both the effects on the environment and on their own interests. Would-be submitters should not themselves have to engage in detailed investigations to enable them to assess the effects of PCG. A Section 32 requires that the objectives of the Plan Change must be examined for their appropriateness in achieving the purpose of the RMA and that the benefits, costs and risks of new policies and rules need to be clearly identified and assessed. HEL has identified gaps in the information provided at the time of notification and seeks amendment, correction, or decline of the plan change if these matters cannot be rectified through the further submission, evidence and hearings process.

¹ Pursuant to RMA s6(2)

SO 51-3

- [4] HEL submits that the timing of PCG is not in accordance with all earlier Council resolutions for urban growth in the City. The Council has a statutory duty to hear Pioneer City West Limited on their accepted and notified Private Plan Change B. A Section 32 requires that the objectives of the Plan Change must be examined for their appropriateness in achieving the purpose of the RMA and that the benefits, costs and risks of new policies and rules need to be clearly identified and assessed. Section 32(2)(b) of the RMA requires that if practicable, the benefits and costs of a proposal are quantified. In this instance, the PCG Section 32 does not address the benefits, costs and risks of advancing PCG ahead of PCWL Plan Change B².
- [5] The National Planning Standards came into force on 3 May 2019. Planning is a forward-looking discipline. The district plan is to give effect to the national planning standards. The Council is captured in the implementation of the National Planning Standards at 4.

4. Territorial authorities not listed in direction 5, and unitary authorities with separate district plans, must comply with the following planning standards: 1. *Foundation*, 4. *District plan structure*, 6. *Introduction and general provisions*, 7. *District-wide matters*, 8. *Zone framework*, 9. *Designations*, 10. *Format*, 12. *District spatial layers*, 13. *Mapping*, 15. *Noise and vibration metrics*, through either a) or b) whichever is sooner:

- a) Amendments to the district plan made by five years from when the planning standards come into effect.
- b) Notification of a proposed district plan (but not a proposed change or variation) for submissions under clause 5, Schedule 1 RMA after the planning standards come into effect.

The Council wants to delay giving effect to the national planning standards; *“the national planning standards will be adopted in a more integrated way through a subsequent plan change to the district plan.”*³ However, the submitter considers this to be an inefficient approach. PCG is notified 3 years after the national planning standards came into effect, and it is likely that the plan change will be heard in 2023 and made operative in 2024 or 2025 subject to appeals. PCG should have been prepared and notified in accordance with the national planning standards. HEL **opposes** the advancement of PCG where it is not in accordance with the National Planning Standards.

² The s32 references “Kākātangiata (formerly City West and Anders Road/Racecourse)” at paragraph 19 on page 9, the unheard Private Plan Change B resides within the former City West area referenced.

³ S32 paragraph 50, page 16

SO 51-4

- [6] The Section 32 fails to address the pending National Policy Statement for Highly Productive Land, there is insufficient information on **how** PCG responds to the pending NPS-HPL. The MfE website advises⁴ that the draft NPS-HPL will be made *'final'* within a short space of time and is likely to be relevant to PCG. It is unclear whether the NPS-UD takes precedence over the NPS-HPL with respect to Urban Growth. HEL is **neutral** on the interface between the NPS-UD and the NPS-HPL, but if both are in force, then both shall be given effect to as they relate to PCG. The PCG notified shall be amended to give effect to the **relevant** National Policy Statements in force prior to the decision on PCG as required by the RMA.
- [7] HEL **opposes** the inclusion of Masterplan 'Method' as a non-regulatory tool that Council officers can consider for consenting under section 104 of the RMA.⁵ HEL **opposes** this information is being incorporated by reference in District Plan.
- [8] As a precautionary approach HEL **opposes** all notified options in PCG that relate to *"a separate statutory process under the Reserves Act 1977"* and is advised Parliamentary website that the separate process achieved Royal Assent prior to this submission (published 31.8.2022, notified as updated on 2 September 2022). The submitter considers that the Greenfields Reserve Criteria in the Supplementary Information on the Councils ODP appears to be at odds with the notified PCG.
- [9] HEL **opposes** general amendments in PCG that do not relate specifically to PCG and are not deemed to be consequential changes resulting from PCG. These have the potential to affect other areas of the city that are outside the area of PCG (are not on the PCG) and have not been assessed or reported on in the s32 report notified.
- [10] HEL **opposes** the inclusion of prescriptive detailed Structure Plans and/or Precinct Plans with supporting text in the plan that prevents the restricts innovative alternatives and flexibility.

⁴ <https://environment.govt.nz/acts-and-regulations/national-policy-statements/proposed-nps-highly-productive-land/> "Final decisions will be made by Ministers and Cabinet at the end of September 2022. If approved by Cabinet, the proposal would be gazetted and take effect soon after decisions are made."

Note at the date of notification the MfE website said the same thing, but by the end of August 2022.

⁵ See, section 32, paragraph 82, page 39. Also see tracked change text Section 7 subdivision, page 31, Policy 3.7: Policy 3.7 will be implemented at the time that rural-residential subdivision applications for land within the Rural-Residential Area identified on the Aokautere Structure Plan are made. The Aokautere Master Plan is intended to inform application of the Aokautere Structure Plan by providing guidance on land development in the area. While the Masterplan has no statutory weight it can be taken into account by Council and other decision-makers when considering proposals under the District Plan and should inform applications within the Aokautere Structure Plan area.

SO 51-5

[11] HEL provides the following table in addition to all other submission points above and below. The table below does not track all aspects of the altered text and the whole submission is relevant to the proposed text.

Notified Change reference	Plan	Notified text	HEL Submission.
Section Additions	4	HEL opposes the notified changes to the ODP section 4. Definitions in their current form and seeks rewording of the underlined text to better achieve the purpose of the Act. The terms “gully network” and/or “natural gully network” are undefined in the Plan, the Horizons Regional Plan and the NPS etc, greater clarity is necessary in relation to other sections of the Plan to enable clarity for the plan users.	Oppose
Section 7		The inclusion of the words “ <i>Requires development to be in general accordance with any relevant structure plan</i> ” and “ <i>Protects Restores and enhances the gulley network</i> ” at Objective 3 of Section 7 Subdivision 7 are opposed. All proposed text associated with Policy 3.7 wording is opposed as the mitigation of effects through this approach may not achieve the purpose of the Act, there is no review and update of the Structure Plan through ‘ <i>general accordance</i> ’ reference in PCG.	Oppose
R7.15.2.1		All text amendments (additions) under this heading are opposed. These changes are not specific to PCG and affect other areas of the city outside the notified plan change area.	Oppose
R7.15.2.1 Performance Standard (c) Natural Hazards and On-site Services		The text amendments (additions) and deletions are not supported in their current form. The submitter seeks more appropriate text.	Oppose
R7.15.2.1 Performance Standard (f) Subdivision in the Rural		The text amendments (additions) and deletions are not supported in their current form. The submitter seeks more appropriate text.	Oppose

SO 51-6

Residential Area identified on the Aokautere Structure Plan		
R7.15.2.1 Performance Standard, Assessment Criteria below (Determination Clause) at (b) On-site services	The text addition of <u>“and the surrounding environment”</u>	Support
R7.15.2.1 Performance Standard, Assessment Criteria below (Determination Clause) at (h) Rural-Residential Development within Aokautere Structure Plan	The text amendments (additions) and deletions are not supported in their current form. The submitter seeks more appropriate text.	Oppose
R7.15.4.1 Non-Complying Activities at 4.	The added text reads <u>“and Subdivision in the Rural-Residential Area identified on the Aokautere Structure Plan (R7.15.2.1(f))”</u> The text amendments is not supported in their current form. The submitter seeks more appropriate text.	Oppose
7A. Greenfields Residential Area Obj/Pol 1 and Obj/Pol 2 amendments	The amendment to Polices 1.2, 1.3, 1.4 are non-specific to the Aokautere Residential Area (Map 7A.4) insert and are opposed. The amendments to Policy 2.5 addition of bullet point 4 is opposed.	Oppose
7A. Greenfields Residential Area Objectives/Policy 3.2 added bullet point and added clause 3.4	The added bulletpoint text <u>“Earthworks in the Aokautere Residential Area avoid adverse effects on the gully network.”</u>	Support condition to opposition on the definition of gully network
7A. Greenfields Residential Area Objectives 4	Added words “which does not result in adverse effects on the environment.”	Support
7A. Greenfields Residential Area Policies 4	Amended and added wording at 4.3 and 4.4 are opposed.	Oppose

SO 51-7

7A. Greenfields Residential Area Policies 4	Added wording 4.6 to 4.9 is conditionally supported, HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Condition support
7A. Greenfields Residential Area Objectives and Polices 5 and 6	Added wording where it relates to the Aokautere Residential Area is conditionally supported HEL opposes wording in relation to Structure Plan and/or Precinct plan in relation to these clauses as set-out in other parts of this submission.	Conditional support.
7A.4 Methods	HEL opposes this wording and the Aokautere Structure Plan and Aokautere Masterplan being incorporated in the plan.	Oppose
R7A.5.2.1, 1. c., 1.r., and 1.t.,	The added text wording is opposed it relates to all greenfield residential and is not a necessary consequential change that results from PCG	Oppose
R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (a) (v)	Added text is specific to Aokautere Residential Area	Support
R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (a) Comprehensive Development Plan (viii), (ix), (xv), (xvi), (xvii), (xviii), (xix), (xx), (xxiii)	The added text wording is opposed, it relates to all greenfield residential and is not a necessary consequential change that results from PCG. Where the text does relate to PCG, the text includes wording in relation to Structure Plan and/or Precinct plan which the submitter opposes. Aspects of the proposed text appear unworkable.	Oppose
R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (b) Essential Services (v)	This text relates to areas outside the PCG area and is opposed.	Oppose

SO 51-8

R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (d) Lot size (ii) & (iii)	Added text is opposed.	Oppose
R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (e) Cul- de-sacs (i)	The proposed amendment to text is not supported. Retain the existing Plan text	Oppose
R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (e) Cul- de-sacs (ii)	The proposed amendment to text is not supported. Delete the proposed words “unless otherwise shown on the area’s relevant Structure Plan.”	Oppose
R7A.5.2.2 Performance Standards for Restricted Discretionary Activity (g), (h),	The proposed amendment to text is not supported. The submitter has concerns in relation to the flood modelling and land stability presented in the technical reports, although most of the text is specific to the Aokautere Residential Area, requirements for both flood modelling and transport network including climate change effects are unclear. Also refer to submission on definitions.	Oppose
R7A.5.2.3 Assessment Criteria for Restricted Discretionary Activity: R7A.5.2.3 (d),	The proposed amendment to text is not supported. The submitter has concerns in relation to the flood modelling and land stability, landscaping, presented in the technical reports, although most of the text is specific to the Aokautere Residential Area, effects are unclear. Also refer to submission on definitions and submission as they relate to structure plans and/or precinct plans	Oppose
R7A.5.3 Rules Discretionary Activity: R7A.5.3.1	Support amendment.	Support

SO 51-9

<p>7A.5.5 RULES: NON-COMPLYING ACTIVITIES R7A.5.5.1 Non-complying activities in Aokautere Residential Area</p>	<p>The proposed amendment to text is not supported.</p>	<p>Oppose</p>
<p>Section 7A notified Maps</p>	<p>Map 7A.4 Aokautere Structure Plan Aokautere Structure Plan Map 7A.4A Street Hierarchy Aokautere Structure Plan Map 7A.4B Lot Pattern & Density Aokautere Neighbourhood Centre Map 7A.3C Precinct Plan Aokautere Neighbourhood Centre Map 7A.4C Precinct Plan Aokautere Structure Plan Street Types Map 7A.4D Street Cross Sections (7A.3D 1 - 17) Aokautere Structure Plan Street Types Map 7A.4D (Adderstone Reserve Alternative) Street Cross Sections (7A.4D 1 - 17) Aokautere Structure Plan Map 7A.4F Street Hierarchy (Adderstone Reserve Alternative) Aokautere Structure Plan Map 7A.4G Lot Pattern & Density (Adderstone Reserve Alternative)</p>	<p>Oppose</p>
<p>Section 10. Residential Zone</p>	<p>All amendments to the Objectives and Policies are opposed, this includes the Policy 1.5 deletion, the addition of Policy 11.3 as it relates to Structure Plan maps, Objective 15 and Policies 15.1 to 15.12</p>	<p>Oppose</p>
<p>Section 10.4 Methods</p>	<p>The inclusion of the Aokautere Masterplan and the associated text is Opposed.</p>	<p>Oppose</p>
<p>R10.6.1.5 amendments to text. R10.6.1.5 (c), R10.6.1.5 (d), R10.6.1.5 (h),</p>	<p>All amendments proposed that are not specific to the Aokautere residential area PCG are opposed. All text that is not specific to Aokautere Residential area and would apply to areas outside the PCG mapped area is not considered a consequential change resulting from Aokautere Residential PCG and is opposed.</p>	<p>Oppose</p>

SO 51-10

R10.6.3.2 i.	Addition of <u>“including Maximum Height and Height Recession Planes”</u> is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not on the plan change	Oppose
R10.6.3.2 vii.	Addition <u>“and access”</u> is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not on the plan change	oppose
R10.6.3.2 under “are Restricted Discretionary Activities with regard to:”	Addition of <u>“including timing of roading infrastructure, connectivity of the street network and effects on vehicular, pedestrian and cycle movement and safety”</u> after the words “The safe and efficient operation of the roading network” the plan should enable private owner or developer led roading, pedestrian and cycle infrastructure provided it promotes the safe and efficient operation of the roading network and pedestrian/cycling connectivity. And the addition of the single word <u>“Earthworks”</u> is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not a consequential change resulting from Aokautere Residential PCG	oppose
R10.6.3.2 Assessment Criteria item (i)	Addition of <u>“including through provision of a range of development density, housing types and forms and the opportunity for mixed use.”</u> is not specific to Aokautere Residential area PCG and would apply to every Greenfield Residential Area in other parts of the City and is not on the plan change	oppose
R10.6.3.2 Assessment Criteria R10.6.3.2 (l)	<u>(l) How use and development in the Aokautere Residential Area integrates with the neighbourhood centre identified in the Aokautere Neighbourhood Centre Precinct Plan (Map 7A.4C).</u> The addition is not supported as the map is too prescriptive and does not enable adjustment that may be required as development occurs.	oppose

SO 51-11

<p>R10.6.3.2 Assessment Criteria R10.6.3.2 (o)</p>	<p><u>(o) Whether buildings, structures and landscaping have been avoided in the 5 metre no-build setback identified on the Aokautere Structure Plan (Map 7A.4).</u> The addition is not supported as the map is too prescriptive and does not enable adjustment that is likely to be required as development occurs.</p>	<p>oppose</p>
<p>R10.6.3.3 Multi-Unit...</p>	<p>Addition of the word <u>“Height”</u> as the addition is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not on the plan change</p>	<p>oppose</p>
<p>R10.6.3.3 Multi-Unit...</p>	<p>The introduction of the words Site <u>“density and”</u> layout as the addition is not specific to Aokautere Residential area and would apply to every Greenfield Residential Area and is not on the plan change</p>	<p>oppose</p>
<p>R10.6.3.3 under Performance standards the addition at R10.6.3.3 iii. Site Coverage</p>	<p>The addition of <u>“unless in the Aokautere Residential Area where a maximum site coverage of 45% applies.”</u></p>	<p>support</p>
<p>R10.6.3.3 under Performance standards the addition at R10.6.3.3 iv (b) bullet point 2</p>	<p>The addition of <u>“A minimum of 8m2 is in area, unless a unit in the Aokautere Residential Area has less than two bedrooms in which case a minimum of 5m2 applies.”</u></p>	<p>support</p>
<p>R10.6.3.3 under Performance standards the addition at R10.6.3.3 vii. Stormwater Design</p>	<p>The addition of wording at bullet point 2 adding the word <u>“demonstrate”</u> is opposed. The addition of the fourth bullet point <ul style="list-style-type: none"> • <u>demonstrate how the stormwater design aligns with the Stormwater Management Plan prepared under R7A.5.2.3(g)</u> is opposed and the addition of the addition of the fifth bullet point <ul style="list-style-type: none"> • <u>demonstrate how adverse effects on the gully network in Aokautere will be avoided</u> The proposed text is not specific to Aokautere Residential area and would apply to every Greenfield Residential</p>	<p>oppose</p>

SO 51-12

	Area and is not a consequential change resulting from Aokautere Residential PCG	
R10.6.3.3 under Performance standards the addition at R10.6.3.3 ix	Introduced notified text <u>“Additional height, recession and setback requirements in the Aokautere Residential Area ...”</u> The proposed text is specific to Aokautere Residential Area	support
R10.6.3.3 under Performance standards the addition at R10.6.3.3 separation distances, x	Introduced notified text <u>“x. Compliance with R10.6.1.5(c)(iv).”</u> The addition is not supported as the Aokautere Residential Structure Plan is too prescriptive and does not enable adjustment that is likely to be required as development occurs. Flexibility in wording to enable greater or less than 5m should be considered for the setback	oppose
R10.6.3.3 Assessment Criteria 1 Character (f)	Added text <u>“development within the Aokautere Residential Area responds to the natural gully network, open space and the network of cycleways and recreational trails.”</u>	oppose
R10.6.3.3 Assessment Criteria 2 Site Planning amendments to (a)	“(a) buildings and related open spaces and landscaping are planned and designed together to deliver high levels of amenity within <u>a range of housing types and forms dwellings</u> and well-located, good quality open spaces, <u>which are consistent with any relevant Greenfields Structure Plan</u> and within the Hokowhitu Lagoon Residential Area provides a safe interface with the adjoining Manawatu Golf Course.” The proposed text seeks to amend the assessment criteria of all current and future greenfield areas rather than amending the plan text for the Aokautere Residential area notified.	oppose
R10.6.3.3 Assessment Criteria 5 infrastructure and Servicing (c)	Item (c) is added but is not bold and underlined as notified. <u>(c) buildings, structures and landscaping are avoided in the 5 metre no-build setback identified on the Aokautere Structure Plan (Map 7A.4)</u> . The addition is not supported as the Aokautere Residential Structure Plan is too prescriptive and does not enable	Oppose (requires greater flexibility)

SO 51-13

	adjustment that is likely to be required as development occurs. Flexibility in wording to enable greater or less than 5m should be considered for the setback, an average of 5m but not less than 3m in width for greater than 4m, or similar	
R10.6.3.3 Assessment Criteria 6	The addition of Assessment Criteria 6 is supported with the following amendment 6. <u>Aokautere Residential Natural Hazards</u> in the title to the assessment criteria	Conditional Support - subject to the amendment to the notified text.
R10.6.3.4 Non-Notification of Multi-Unit Development Activities	The text addition <u>“and the Aokautere Residential Area”</u> and map reference <u>“and 10.6.3.3 (h)”</u> is supported. The submitter remains opposed to the inclusion of the structure plan without greater flexibility for review and updating without a Schedule 1 process.	Support
10.7.4 Rules: Discretionary Activities	The deletion of “<u>[Note: The following activities are also subject to R10.7.5.2 Non-Complying Activities:]</u>” is supported	Support
10.7.4 Rules: Discretionary Activities	The addition of <u>“unless R10.7.5.2 applies, or in the case of Retirement Villages in Greenfield Residential Areas, R10.7.5.3 applies.”</u>	Oppose
10.7.4 Assessment Criteria k.	The added text commences with <u>“In respect of R10.7.4.6, and where they are proposed in Greenfield Residential Areas, how any activity:”</u> and is followed by bullet points. The bullet points duplicate (in part) aspects of the Assessment Criteria a-i. The inserted text for Retirement Villages and Residential Care Centres in Greenfield Residential Areas and is linked to structure plans/or precinct plans but this text relates City Wide to future Greenfield Residential Areas across the City rather than to the Aokautere Residential Areas. The text should be rewritten to be on PCG and is not considered to be consequential changes as a result of the insertion of new rules, as necessary. The submitter remains opposed to the inclusion of the structure plan without greater flexibility	Oppose

SO 51-14

	for review and updating without a Schedule 1 process.	
10.7.4 Assessment Criteria k. Note to Plan Users (deletions below the assessment criteria)	Deleted text as it relates to R10.7.1.6 Limited Development Land in Aokautere: “A plan must be submitted to identify appropriate stormwater design for the development, and: demonstrate how peak run off volume is to be mitigated • how low impact development principles are applied • identify a secondary flow path.” The deleted text appears relevant to R10.7.1.6 iii Drainage and water supply, particularly drainage and there is no explanation for the deletion of the guidance note with respect to stormwater design. The guidance note in the Plan appears helpful and should remain.	Oppose
Added rule at Section 10.7.5 Rules: Non- complying activities <u>R10.7.5.3</u>	Added text <u>“R10.7.5.3 Retirement Villages in Aokautere Residential Area Any new retirement village in the Aokautere Residential Area which is not located and developed in accordance with the Aokautere Structure Plan.”</u> The submitter remains opposed to the inclusion of the structure plan without greater flexibility for review and updating without a Schedule 1 process. There may be good reasons to relocate the position of this activity relative to the structure plan later and non-compliance should not be triggered in this manner, particularly where the effects of the activity can be mitigated in any location.	Oppose
Section 11: Business zones. 11.10.5 Rules Non-Complying Activities	Index deleted text R11.10.5.1 Offensive Activities and Crematoria and addition of <u>The following activities are Non-Complying Activities:</u> (a) <u>Offensive Activities, Industrial Activities, and Crematoria, and Residential Accommodation at Ground Floor Level and Residential Activities at Ground Level in the Aokautere Neighbourhood Centre</u> are Non-Complying Activities- <u>and</u> (b) <u>The construction, reconstruction or alteration of any building or structure</u>	Oppose

SO 51-15

	that does not comply with Performance Standard R11.10.2.2(j). The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan without greater flexibility for review and updating without a Schedule 1 process. The Plan should include a more enabling process.	
11.10.1 Objectives and Policies. New <u>Objective 6</u>	The added text is specific to the Aokautere Residential Area and is <i>supported</i> , but the Policies 6.1, 6.3, 6.6, 6.7 and 6.9 current wording are opposed where the wording connects in the Plan with predetermined design based on a structure plan/precinct plan dictate inflexible design solutions. The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.	Support in part. Oppose Polices 6.1, 6.3, 6.6, 6.7 and 6.9 are oppose
11.10.2 Rules: permitted Activities, R11.10.2.1 Permitted Activities	The modified text at bullet point 2, “Offensive Activities, Industrial Activities, Crematoria, and Residential Accommodation at Ground Floor Level and Residential Activities at Ground Floor Level in the Aokautere Neighbourhood Centre which are Non-Complying Activities” opposed for the same reasons specified earlier.	Oppose
R11.10.2.1 Performance Standards (c) ii	Text added “No signs shall be located above the fascia level of a building (see Figure 11.5A), with only one fascia sign per tenancy within the Aokautere Neighbourhood Centre.” Why is this level of design control being promoted for Aokautere business where it is at odds with the provisions for the City? Absolute design control affects design innovation and may adversely affect businesses establishing in this location, particularly Franchise businesses. The current signage provisions of the plan often require RC and are suitable to ensure that signage makes a positive contribution to the city.	Oppose

SO 51-16

<p>R11.10.2.1 Performance Standards (g) i & ii</p>	<p>Added text <u>(g) Residential Activities in the Aokautere Neighbourhood Centre (Map 7A.4C):</u> <u>i. No residential activities shall be located at the ground floor level;</u> <u>ii. Residential activities shall not be the dominant activity on the site.”</u> The nature and scale of business has changed in NZ due to the Covid 19 pandemic and a combination of a ground floor rear flat and ground floor front business should not be excluded. The provisions should restrict business to the street frontage but not exclude residential entirely.</p>	<p>Oppose</p>
<p>R11.10.2.2 The Construction, Alteration of, or Addition to Buildings. R11.10.2.2 performance Standard (a) Maximum Floor Area, iii</p>	<p>Added text <u>“iii. In respect of residential activities in the Aokautere Neighbourhood Centre (Map 7A.4C), a minimum average of 50 dwellings per hectare shall be achieved.”</u> This is a prescriptive design outcome and may not be achievable for a variety of reasons, not least that the monotony of form may result, that it may not be supported by the market, may result in cost effective construction and affordability.</p>	<p>Oppose</p>
<p>R11.10.2.2 The Construction, Alteration of, or Addition to Buildings. R11.10.2.2 performance Standard (b) Building Height, ii</p>	<p>Added text - ii. All other structures must not exceed 9m in height <u>unless located in the Aokautere Neighbourhood Centre (Map 7A.4C) where structures must not exceed 11m in height.</u> Height limits the depth to building frontage ratio for natural light into interiors and for energy efficiency. More interesting roof forms and inhabitation of the roof space would be more achievable in design with an adjusted height recession arrangement and an increase in height. A control flexibility for extra height of 1m should be examined.</p>	<p>Conditional Support</p>
<p>R11.10.2.2 The Construction, Alteration of, or Addition to Buildings.</p>	<p>Text amendments. <u>“d. All buildings and tenancies required to be built to the front boundary shall provide at least one pedestrian entrance at the street.</u></p>	<p>Oppose</p>

SO 51-17

<p>R11.10.2.2 performance Standard (e) Building Frontages, Positioning, and d. amended text</p>	<p>e. <u>Within the Aokautere Neighbourhood Centre (Map 7A.4C) all pedestrian entrances shall be provided at the street frontage (excluding service lanes).</u>” A combination of Street Frontage business and rear residential living could provide an excellent design outcome. The submitter remains opposed to the inclusion of the Aokautere Neighbourhood Centre Precinct Plan and Structure Plan without greater flexibility for review and updating without a Schedule 1 process.</p>	
<p>R11.10.2.2 The Construction, Alteration of, or Addition to Buildings. R11.10.2.2 performance Standard (f) Verandas, i. and iv.</p>	<p>R11.10.2.2 i. amendment is supported R11.10.2.2 (f) iv. Is opposed. The latter reads “Within the Aokautere Neighbourhood Centre (Map 7A.4C) lettering shall not dominate the canopy area by being secondary to the veranda.” This is a prescriptive design outcome. Why is this level of design control being promoted for Aokautere business where it is at odds with the provisions for signage in other parts of the City?</p>	<p>Oppose</p>
<p>R11.10.2.2 The Construction, Alteration of, or Addition to Buildings. R11.10.2.2 performance Standard (g) Shop front and Glazing (i) Large Neighbourhood Centres, Small Neighbourhood Centres and Local Stores (and note to plan users)</p>	<p>Text amendments bullet point 1. “• All buildings shall have clear glazing for 75% of the height of the ground <u>primary</u> floor frontage and for no less than 75% of the ground <u>primary</u> floor frontage width. <u>On corner sites, the proportion of clear glazing on the secondary frontage shall not be less than one third of the secondary frontage width. The exception is at the interface with Pacific Drive in the Aokautere Neighbourhood Centre (Map 7A.4C) where all buildings shall have clear glazing for 75% of the ground floor primary and secondary frontage.</u>” In practice 75% of the height of the ground floor frontage has resulted in endless peer review by PNCC consenting in terms of urban design outcomes. The current rule is inflexible and in practice those seeking consent require a more flexible rule of between 60-75%. There is a genuine concern regarding the increased violence in NZ communities and ground</p>	<p>Oppose</p>

SO 51-18

	<p>floor retail would benefit from the ability to have a greater percentage of solid areas to built-into the frontages at a low level to prevent ram-raids. It is good urban design practice to have visual connection between the exterior and the interior, but the level must include consideration of other matters, such as life safety and property protection of the building users. The addition of text is opposed in the plan.</p> <p>Text amendments bullet point 4 added <u>“Window size, proportion, grouping and/or subdivision of openings should take account of the overall architectural elevation of the building.”</u> This affects all Large Neighbourhood Centres, Small Neighbourhood Centres and Local Stores, and is not considered a consequential change of Plan Change G, the change is opposed.</p> <p>Text amendments bullet point 5 added <u>“Fascia shall be sited below the sill of the first-floor windows in the Aokautere Neighbourhood Centre (Map 7A.4C) and must not cross adjoining buildings. (See Figure 11.5A).”</u> This is poorly worded as to the intended design outcome and is again prescriptive.</p> <p>Note to plan users added: <u>For the purposes of R11.10.2.2(g)(i) the primary frontage of a building is the portion of a frontage that serves the main access point to a building or tenancy and faces the principal retail street through the centre, while the secondary frontage is the portion of a frontage facing a lower-order street through the centre and not providing the main access to the building or tenancy.</u></p>	
<p>R11.10.2.2 The Construction, Alteration of, or Addition to Buildings. R11.10.2.2 performance</p>	<p>Text amendment moves this to a subheading point with the same rule.</p>	<p>Neutral</p>

SO 51-19

Standard (h) Ground Floor Parking		
R11.10.2.2 The Construction, Alteration of, or Addition to Buildings. R11.10.2.2 performance Standard (j) Aokautere Neighbourhood Centre Precinct Plan	Text added at new <u>“(j) Development in the Aokautere Neighbourhood Centre shall be in accordance with the Aokautere Neighbourhood Centre Precinct Plan (Map 7A.4C)”</u>	Oppose
Rule 11.10.2.1 (i)	Added text (i) signs does not appear to be related to PCG and is opposed	Oppose
Assessment Criteria R11.10.3.1 (e) renaming and addition of R11.10.3.1(h)	R11.10.3.1 Assessment Criteria (e) supported. R11.10.3.1 Assessment Criteria (h) wording amendment is opposed.	Oppose
R11.10.3.2 Performance Standard xv. added	Text added, <u>“xv. Consistency with any relevant Precinct Plan or Structure Plan.”</u> This text addition is not a consequential change due to PCG and is not on the plan change. This added wording affects Whakaronga, Kikiwhenua, and Whiskey Creek (decision pending) and future greenfield across the city.	Oppose
R11.10.3.2 Performance Standard Assessment Criteria (d) xii added, and (e) iii added and (e) iv added	Text added at these clauses and rules is opposed for the same reasons previously stated. The wording imposes directive affects all existing and new. Integrating with the existing streetscape and relating to the character of what is physically there can and does result in poor design outcomes. The use of ‘avoidance’ is unhelpful in the wording.	Oppose
15.2.5 Arena Zone, 15.3 Resource Management Issues amended text at Issue 5 as it relates to	The text amendment reads: “5. The need to protect and restore areas of high amenity, ecological and conservation value from inappropriate development.”	Oppose.

SO 51-20

activities associated with the use of the Recreation, Conservation and Amenity, Racecourse, Water Recreation, and Arena Zones		
---	--	--

- [12] Private Plan Change for Whiskey Creek has a decision pending. PCG does not explain to the submitter what alterations to the text of the plan result and affected the notified text in the plan as a result of the Whiskey Creek decision if the plan change is granted. The effects of PCG as notified have the potential to adversely affect the Whiskey Creek Plan Change. The s32 does not provide the submitter with clarity. The submitter takes a precautionary approach and **opposes** any proposed text in PCG that affects the decision text of the Private Plan Change to Whiskey Creek.
- [13] HEL wishes to be heard in support of its submission in person and/or by remote audio-visual⁶ technology.
- [14] HEL **supports** a duplicate submission in English of any Te Reo submission being approved by the original Te Reo submitter (as a correct submitter approved English translation) prior to further notification. HEL **supports** the original Te Reo submission and the English translation of the original Te Reo submission being numbered as the same submission for further submission notification.

⁶ RMA s39AA (1) (b)

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

Privacy s7(2)(a)

Privacy s7(2)(a) Privacy s7(2)(a) with delegated authority to sign this submission on behalf of the submitter **Heritage Estates (2000) Limited (HEL)**

Date: 5 September 2022

Electronic address for service of submitter:

Heritage Estates 2000 Limited (“HEL”)

Privacy s7(2)(a)
Privacy s7(2)(a)

Telephone: Privacy s7(2)(a)

Contact person: Privacy s7(2)(a)

Email: Privacy s7(2)(a) and jointly provide all correspondence to HEL’s consultant Privacy s7(2)(a) at the same time.

SO 51-22

ATTACHMENT ONE:

The notified documents relied on for this submission are:

1. Palmerston North City Council Webpage Text for Plan Change G

Technical reports:

2. PC G Section 32 technical report: Proposed plan change G (109 pages)
3. PC 6 Appendix 1 – Proposed Plan Change G Amendments to the District Plan: Part 1 (240 pages)
4. PC 6 Appendix 1 – Proposed Plan Change G Amendments to the District Plan: Part 2 (240 pages)
5. Appendix 2: Zoning Maps (2 pages)
6. Appendix 3: Aokautere All Structure Plans (26 pages)
7. Appendix 4: Aokautere Masterplan Report: Part 1 (19 pages)
8. Appendix 4: Aokautere Masterplan Report: Part 2 (19 pages)
9. Appendix 4: Aokautere Masterplan Report: Part 3 (19 pages)
10. Appendix 4: Aokautere Masterplan Report: Part 4 (19 pages)
11. Appendix 4: Aokautere Masterplan Report: Part 5 (19 pages)
12. Appendix 4: Aokautere Masterplan Report: Part 6 (18 pages)
13. Appendix 5: Traffic Assessment Aokautere (50 pages)
14. Appendix 6: Cultural Impact Assessment (12 pages)
15. Appendix 7: Ecology Report Addendum (68 pages)
16. Appendix 8: Acoustic Assessment (6 pages)
17. Appendix 9: Geotechnical Assessment (60 pages)
18. Appendix 10: Landscape Character Assessment (14 pages)
19. Appendix 11: Stormwater Management Strategy (64 pages)
20. Appendix 12: Aokautere Centre Retail Report (17 pages)
21. Appendix 13: Parks and Reserves Servicing Memorandum (20 pages)
22. Appendix 14: Urban Design Statement Planning Controls (14 pages)
23. Appendix 15: Technical Report Summary (8 pages)

SO -52

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Elena
Last name	Garcia
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Map 7A.3E
My submission is:	I do not support any loss of the Adderstone Reserve to development. Part of why we moved to this neighbourhood is the access to green space and room to play outdoors with our children. I would be sad to see the loss of the reserve for additional housing or commercial prospects (there is plenty being built across the ravine from us as we speak). Please consider an alternative to best meet the needs of our community.
I seek the following decision from Palmerston North City Council	No Rezoning of Aoautere.
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	Yes

SO 53-1

SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, the Reserves Act 1977 and the Resource Management Act 1991, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

For more information, see our privacy statement, pncc.govt.nz/privacy

Submissions close

4pm, Monday 5 September 2022

Mailing to:

Palmerston North City Council
Private Bag 11-034, Palmerston North
Attention: Democracy & Governance
Manager

Delivering to:

Council's Contact Services Centre
Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name

Larry

Last name

Harrison

Postal address

Privacy s7(2)(a)

Email

Privacy s7(2)(a)

Phone / Please provide a daytime contact number

Privacy s7(2)(a)

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes

No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

Yes

No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

Promontories D1-D5 reasoning & cluster housing
Maps 7A.4, 7A.4A, 7A.4B, & 7A.4D
Stormwater G2-18 Map 7.A pg 32. Visual Impact.

MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

Promontories - this cluster housing has a build line too close to hill face. Min 15mtrs from hill face to protect against erosion, visual eyesore, & too much housing resulting in stormwater management issues. The habitats in streams & surrounding bush etc will be at risk thru increased storm-water from run-off above valley, which already struggles in a deluge. Too much @ stake.

I seek the following decision from Palmerston North City Council / Give precise details

- Minimum 15mtr setback from hill-face for new builds
- Minimum 6000m² section size to ease water runoff*
- Maximum two-storey dwellings. No three-storey units.

*for sections overlooking Moonshine Valley.

**Supporting information**

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes

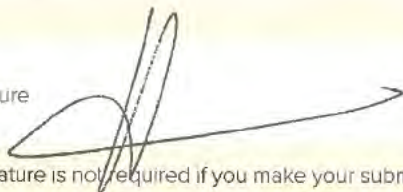
 No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes

 No

Signature



Date

5/10/22

A signature is not required if you make your submission by electronic means.

SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, the Reserves Act 1977 and the Resource Management Act 1991, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

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Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name **Barry** Last name **Scott**

Postal address **Privacy s7(2)(a)**

Email **Privacy s7(2)(a)**

Phone / Please provide a daytime contact number **Privacy s7(2)(a)**

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission? Yes No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

see attached

I seek the following decision from Palmerston North City Council / Give precise details

Reduction in number and size of sections in this sub division



Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option



Yes



No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option



Yes



No

Signature

Date **5th September 2022**

A signature is not required if you make your submission by electronic means.

SO 54-3

Re: Proposed District Plan Change G: Aokautere urban growth; and the future use of Adderstone Reserve

Aokautere Urban Growth

With a growing population Palmerston North does need to build a lot more houses in the near future but this should be in a sustainable way.

While I support urban growth on the unproductive clay soils of Aokautere rather than the fertile, agriculturally productive land north of the city, I am concerned about the degree of intensification proposed. The level of intensification is at a level never seen before in the city on land that is quite distant from the city and above bush reserves that are of high ecological and recreational value.

Impact of surface water on the surrounding land

With climate change we are seeing a dramatic increase in both the intensity and frequency of flooding in the Manawatu and throughout New Zealand. When we moved to Moonshine Valley in 1994 the Mangaotane stream (Bryant's stream) would flood every two to three years. Now it floods several times each year with a dramatic increase in erosion of the banks and deposition of sediment in the stream. One only need to walk into the entrance of Moonshine Valley Reserve to see the huge impact of this increased flooding. This valley is a microcosm of what is happening in all the streams and tributaries that flow into the Manawatu river.

The increased sedimentation in the last few years has been exacerbated by the housing developments occurring on the surrounding land that drains through gullies into Mangaotane stream. The stream has Koura (freshwater crayfish), Kakahi (freshwater mussels), Giant Kokopu and Longfin eel. My greatest concern with the proposed Aokautere Urban Growth Plan is the impact of storm water run-off into Moonshine Valley Special Area and the impact on the land and the stream. Urban development brings with it a significant increase in concrete and asphalt surfaces with increased water run-off in storm events. While the proposed plan includes mitigation strategies these seem seriously inadequate.

- Section boundaries should be at least 15 m back from the edge of the gullies as in the Turitea Valley not 5 m.
- The proposed ponds to capture the water appear to be too few and not large enough in size to really capture large volumes of water in storm events
- The size of sections close to the edge of the gullies is too small
- Land overlooking Moonshine Valley should be retain Rural-Residential zoning

Intensity of housing and flow on effects

The plan envisages a build of around 1050 new dwellings in a mixture of single through to three-storey houses at a density lower than any of the built-up areas within the city. While intensification of housing in the central part of a city is desirable to create a vibrant and sustainable city doing this on the outskirts of the city is moving in an unsustainable direction

SO 54-4

- There will be a dramatic increase in car trips per day along Aokautere and Sommerville Drives into the city and put huge traffic pressure on Fitzherbert Avenue
- The distance (6-9 km) from the heart of the city for much of the proposed development would make it one of the most car-dependent suburbs in the city
- More car traffic will increase CO₂ emissions for the city, which is counter to the current sustainability goal of PNCC.
- While the plan includes arteries for public bus transport unless the service is frequent, relatively cheap and convenient to use, residents will take the easy option of private car usage as they already do throughout much of the city.
- For those choosing to use a cycle as a transport option the increase in traffic will pose a greater risk to safety
- Housing intensification at this level on the outskirts of the city is going to increase our greenhouse gas emissions when we should be moving to decrease them.
- The plan is counter to the sustainability goals of *He Rautaki Tāone Tautaiiao Eco City Strategy 2021-2031*.

Yours sincerely
Barry Scott

Privacy s7(2)(a)

SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH



FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if Council is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy

Please note, as required by the Local Government Official Information and Meetings Act 1987, the Reserves Act 1977 and the Resource Management Act 1991, all submissions will be publicly available. This includes being published on this website. Your contact details (but not your name) are confidential and will not be published.

For more information, see our privacy statement, pncc.govt.nz/privacy

Submissions close
4pm, Monday 5 September 2022

Mailing to:

Palmerston North City Council
Private Bag 11-034, Palmerston North
Attention: Democracy & Governance
Manager

Delivering to:

Council's Contact Services Centre
Civic Administration Building
The Square
Palmerston North

Visiting our website:

pncc.govt.nz/aokautere

Emailing to:

submission@pncc.govt.nz

YOUR CONTACT DETAILS

First name: **Christine**

Last name: **Scott**

Postal address:

Privacy s7(2)(a)

Email:

Privacy s7(2)(a)

Phone / Please provide a daytime contact number

Privacy s7(2)(a)

GAIN OR AFFECT

Could you gain an advantage in trade competition through this submission?

Yes

No

Complete this field if you selected 'Yes' in Gain or affect: Could you gain an advantage in trade competition through this submission?

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

Yes

No

YOUR SUBMISSION

The specific provisions of the proposal my submission relates to are:

Give details / for example, page number, provision or map number.

SUBMISSION ON PROPOSED PLAN CHANGE G:
AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



MY SUBMISSION IS:

Include whether you support or oppose the specific provisions or wish to have them amended, and the reasons for your views.

See attached

I seek the following decision from Palmerston North City Council / Give precise details

A change in the size and number of sections to be included in this sub-division



Supporting information

Please attach all files to the end of this form before submitting it.

HEARING

We anticipate holding a hearing for this plan change in early 2023. Please indicate if you'd like to speak.

I wish to be heard in support of my submission / Select 1 option

Yes

No

If others make a similar submission, I will consider presenting a joint case with them at a hearing
Select 1 option

Yes

No

Signature

Date

5 Sept 2022

A signature is not required if you make your submission by electronic means.

SO 55-3

Proposed District Plan Change G Aokautere Urban Growth

I acknowledge that Palmerston North does need to build new houses in the near future and that using the less unproductive land in the Aokautere area is a better alternative than using good agricultural land. However more thought needs to be given to higher traffic flow, water run off and recreation areas.

Surface Water Runoff.

My main concern with the proposed 1000 plus housing development is the huge number of homes crammed into the area with a resulting increase in water runoff into the gullies. There does not seem to be any proposal to link storm water to the existing city storm water system. Ground area into which rain water can be absorbed will be significantly decreased. If, for arguments sake, the area covered by houses, driveways, streets etc, covers 25% of the proposed development area (a very conservative estimate), this must result in approximately 25% increase in the amount of water running down into the gullies. The gullies may be able to handle this under a normal rain fall but increasingly, with climate change, rain events are becoming much more extreme with huge increases in volumes of water discharged down the gullies and into the Moonshine valley stream. In the past month we have had 3 Moonshine valley floods where water has covered the bottom of our section, flowed through our chook house and water covering our little bridge (which is approx. 1.5m above the level of the stream) by half a metre. We have lived here 25 years and until the last 2 or 3 years we have had less than half a dozen floods go over our land and prior to this year we have only had water go through our chook house 2 or 3 times.

This last year has also seen a big increase in the amount of slumping and slips along the Moonshine Valley stream with a huge slip coming down in the Moonshine Reserve opposite our property. A few years ago it was easy to walk up the Moonshine Reserve, jumping the stream as it wound its way down but this has now been eroded away making it very difficult to cross each bend in the stream, plus there has been a huge slip come down on the right not far from the entrance to the reserve. The edge of the Moonshine Stream has slumped badly in the Tutukiwi Reserve resulting in closure of the road into the carpark plus there have been large hunks of the bank removed in the grass reserve. There has also been a huge increase in the amount of silt come down the creek with all the housing that has gone in off Pacific Drive. Putting in ponds will have little effect in heavy rainfall events.

The increase in housing off Pacific Drive is minor compared to what is proposed in this current 'Urban Growth Plan'. Yet we are already seeing the impact of the development that has occurred over the last 2-3 years. It is of great concern that the impact of the proposed development will be even greater, having a substantial negative impact on properties bordering the Moonshine stream and the gullies that run into Moonshine Valley.

Traffic Flow

SO 55-4

Already it is becoming increasingly difficult to merge onto Aokautere Drive from Pacific Drive, Johnstone drive, Cashmere Drive, etc plus increasingly dangerous for cyclists. Plus there is only one bridge over the manawatu river which services the Aokautere community. More thought needs to be given to traffic management, cycle lanes and bus services.

Christine Scott

Privacy s7(2)(a)

SO 56-1

Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Paul & Jan
Last name	Dixon
Gain or affect	
Could you gain an advantage in trade competition through this submission?	No
I am directly affected by an effect of the subject matter of the submission that: a. adversely effects the environment; and b. does not relate to trade competition or the effects of trade competition	
Your submission	
The specific provisions of the proposal my submission relates to are:	Map 7A 3E
My submission is:	We understand the need to plan for future growth of the city but fear that the current proposal will increase dramatically the traffic on Turitea Road thereby equally dramatically decreasing the amenity value of Turitea Rd. This road is currently heavily utilised by runners, walkers, cyclists and horseriders.....PN is indeed fortunate to have such a space so close to the city centre. It will be of even greater value to future generations,
I seek the following decision from Palmerston North City Council	that any future development in the Aokautere/Turitea area does not erode this important leisure area. Further, that PNCC considers developing high-density housing nearer to the city rather than sprawling dev. over farm land.
Supporting information	
Hearing	
I wish to be heard in support of my submission	Yes
If others make a similar submission, I will consider presenting a joint case with them at a hearing	

SO 56-2

From: Submission
Subject: FW: submission on Aokautere Plan

From: Paul and Jan Dixon < >
Sent: Monday, 5 September 2022 12:52 pm
To: Submission <submission@pncc.govt.nz>
Subject: submission on Aokautere Plan

My husband and I understand the need to plan for future growth of the city but fear that the current proposal will destroy some valuable city assets, valuable now but even more so for future generations.

I wish to present our views at the Hearing

Paul & Jan Dixon

SO 57-1

Submission on Proposed Plan Change G – Aokautere Urban Growth

Privacy s7(2)(a) Active Transport Lead, Sport Manawatū.

Privacy s7(2)(a)

Phone: Privacy s7(2)(a)

Email: Privacy s7(2)(a)

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

The specific provision so the proposal my submission relate to are: provision of infrastructure for active travel.

We seek amendments to the proposed development namely that before the new development is started:

1. A separated cycle route is developed that connects:
 - a. Johnstone Drive with Pacific Drive (shared path as proposed)
 - b. Separated cycle for Pacific Drive (only a painted lane proposed)
 - c. Separated path from Pacific Drive to Fitzherbert Bridge
 - d. No roundabouts built on cycle route
2. Infrastructure is developed to enable children to safely walk and cycle to the new school proposed for Peren Park (as we understand it is about to be built).

Sport Manawatū is making this submission in line with its vision of “Everyone active” and its work with Palmerston North City Council to advocate for active transport. A decision not to build the active-travel infrastructure would reduce our ability to successfully encourage more people to walk and cycle. We do not gain an advantage in trade competition through this submission.

Our amendment is in line with advice from Te Waka Kotahi which states:

Design neighbourhood streets for slow, mixed traffic. Design busier streets with physically separated cycling facilities. (<https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/cycle-network-and-route-planning-guide/principles/cycle-route-components-between-intersections/>, accessed August 2022)

Reasons for our concern

The proposed development will increase traffic and risk to people using active transport. The recommended mitigation does not provide separated cycle lanes from a busy state highway and so will not reverse the current trend of declining numbers of cyclists. The recommendations to insert more roundabouts will further increase risk to cyclists as roundabouts are the most dangerous type of intersection for cyclists.

The proposed development should not go ahead until there is construction of a separated cycling route connecting Johnstone Drive and Pacific Drive to Fitzherbert Bridge; and a school travel route to the new school (being planned for near to Peren Park). The new houses will generate more traffic and make this area even less attractive to people using active travel. Unless more active-transport infrastructure of a high standard is built, the growth in traffic will further undermine the city's

SO 57-2

aspirations to reduce its carbon footprint; while decreasing the chances of the city becoming more active.

The Aokautere Structure Plan Transportation Assessment reports that an increase in traffic in this area will increase risk (real and perceived) for cyclists and it recommends:

A commuter cycle route should be identified by Council and any associated upgrades programmed and implemented prior to the traffic associated with the Proposed Plan Change being loaded onto the road network.

The summary of technical report in appendix 15 recommends

An option for safely accommodating cyclists travelling between the northern end of Ruapehu Drive and the City should be developed.

The planned provision for cyclists, however, does not meet best practice guidelines:

TCD Manual Part 5 will provide details regarding the widths required for wide and narrow transit lanes. In the interim, best practice guidance is provided below.

New Zealand best practice is to provide transit lanes wide enough for cyclists to ride adjacent to motor vehicles, ie 4.2 m or wider (<https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/designing-a-cycle-facility/between-intersections/transit-lanes/>, accessed August 2022)

But Urban Connector A only requires a space of 3.9 metres and limits the cycle land to 1.8 metres wide. Urban Connector B provides 2.3 metres for the parked car but only 1.8 metres for the cyclists which is the NZTA “desirable minimum length” (listed in their 2010 publication, <https://www.nzta.govt.nz/assets/resources/motsam/part-2/docs/motsam-2-section-2.pdf>, accessed August 2010) but is not good practice.

We note that Wellington requires a much wider space for car parks (and so wonder why much narrower widths are used in Palmerston North) - “Car parks on road reserve must be at least 3m wide and 6m long”. (<https://wellington.govt.nz/property-rates-and-building/building-and-resource-consents/resource-consents/before-you-apply-for-a-resource-consent/on-site-car-park-requirements#:~:text=Car%20parks%20on%20road%20reserve,3m%20wide%20and%206m%20long.>, accessed August 2022)

The provision of a narrow cycle lane will not encourage more cyclists onto the road, as these roads are either busy or connect to a State Highway which is busy and so will only appeal to enthused and confident riders.

Traditional cycle lanes are painted lanes within the carriageway that are suitable for enthused and confident cyclists. The majority of interested but concerned cyclists are comfortable riding in cycle lanes at modest traffic volumes and speeds. (<https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/designing-a-cycle-facility/between-intersections/cycle-lanes/#:~:text=Cycle%20lane%20width%20should%20be%20between%201.5%20m%20and%202.0%20m.>, accessed August 2020)

SO 57-3

The standard of cycle lanes needs to be more than a painted lane and a bit of space on the side of the road if more people are going to be encouraged to cycle.

For beginner and intermediate cyclists there are many people who would be unwilling to ride on both painted cycle lanes and mixed traffic environments. Given that these are the most common scenarios less experienced riders will encounter on New Zealand's network, and most trips will have at least some time spent on roads with no formal cycling facilities, this is a significant opportunity to increase the uptake of cycling. This is supported by other observational rider studies in New Zealand that have also indicated that riders must divert their ride to a safer route (eg Balanovic et al 2016).

(<https://www.nzta.govt.nz/assets/resources/research/reports/660/660-Factors-affecting-cycling-levels-of-service.pdf>, accessed February 2021)

Improved active-transport Infrastructure for the suburbs near Summerhill and Aokautere Drives is needed as numbers cycling in Palmerston North are declining despite Council aspirations to the contrary. The proposed increase in houses will just increase car traffic and reinforce existing barriers to less carbon-intensive transport unless Council decides to prioritise transport other than cars. As The Palmerston North Transport plan states

For many trips in Palmerston North, the choice of transport modes is limited. For example, there are insufficient or inadequate cycle lanes, and a lack of frequent bus services.

(<https://www.pncc.govt.nz/files/assets/public/documents/council/strategic-direction/transport-plan-2021-31.pdf> states, accessed August 2022)

But increasing bus frequency requires extra passengers - otherwise the buses are just adding to congestion. As the traffic assessment notes the usage of buses is unlikely to change without changes to parking but much of parking in Palmerston North is under private control and very cheap when compared to other cities.

Safety concerns

Building cycle lanes will not work if there remain dangerous parts on the cycle route. The Transportation Assessment reports finds 24 crashes in the last five years of which three involved cyclists (page 16). The Transportation report conflates active transport to work (page 22) which is not statistically valid as pedestrian and cyclist injury trends differ and no injury noted in the report involves a pedestrian. Census data for Poutoa shows that 3.7 percent cycle to work (<https://www.stats.govt.nz/tools/2018-census-place-summaries/poutoa#travel-to-work>, accessed August 2022). If injury numbers were proportionate to the proportions cycling to work, then of the 24 injuries slightly less than one injury would involve a cyclist, but the number is more than three times greater. This data indicates there is extra risk for cyclists – and that the risk will increase as traffic increases because two of the incidents occur at intersections; and the third is near to an intersection.

These intersections will get busier and more complicated with the increasing traffic generated by new houses thereby increasing the real and perceived risk of cycling in this area. This will be made worse when intersections are modified to make travel easier for cars (as extra lanes are built to accommodate greater traffic).

This problem will not be solved by further education of cyclists. NZTA note that where a cyclist was injured on the road and a motorist was required to give way, "five out of six times it was the driver of the motor vehicle who failed to do so" (<https://www.nzta.govt.nz/walking-cycling-and-public->

SO 57-4

[transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/cycle-network-and-route-planning-guide/principles/safety-issues-for-people-who-cycle/](https://transport.cycling/cycling-standards-and-guidance/cycling-network-guidance/cycle-network-and-route-planning-guide/principles/safety-issues-for-people-who-cycle/), accessed August 2022)

This document notes that roundabouts “have the highest risk per cyclist, because drivers who are required to give way before entering roundabouts travel faster on the approach than at other intersection types. Drivers tend to check for conflicting traffic further away on the approach, and thus look past cyclists who are often positioned in the periphery of their vision”.

We therefore oppose any roundabouts being built on this route unless cyclists have a separated route to avoid the roundabout and that does not require more effort to use (as cyclists are lazy and will take the easiest route).

Building active-travel infrastructure prior to the new development will save money. Creating a cycle route that attracts more users is likely to be expensive when the work changes existing infrastructure – for example: on Pacific Drive where the cycle lane will have to be added to a comparatively narrow street with residents losing parking. The cost could be as great as creating a cycle lane in College Street where the original budget of \$140,000 rose to 1.2 million. (<https://viastrada.nz/sites/default/files/2020-03/Lieswyn-UCNMP-TGConf2020-web.pdf>, Accessed August 2022).

New school transport infrastructure required

The transportation assessment makes no mention of the new school that is to be built in Aokautere. With the extra traffic and high speeds of Aokautere and Summerhill Drives, it is unlikely that many if any children will walk, scooter or cycle to school. But traffic accessing Ruapehu Drive and the school will create further congestion and risk for pedestrians and cyclists. We therefore recommend that a new study is done to determine the impact of the new school on traffic and likely further impacts once the new subdivisions are in place.

From a health perspective, it seems wrong that children are unable to safely walk to school but crossing roads with 60 and 70 kmh speed limits surely makes this impossible. We would recommend that the speed limit should be reduced to 30kmh (perhaps only at school-travel times) for crossings on Aokautere and Summerhill Drives where these enable children to get to school; and at the intersections of Ruapehu Drive with Aokautere and Summerhill Drives.

We seek the following decisions from Palmerston North City Council:

We agree with the Transportation Assessment that the new development should not go ahead until new active transport infrastructure is in place to provide safe access from this area to the CBD but believe infrastructure of a higher standard is required.

1. Accordingly, we recommend a separated cycle route is developed that connects:
 - a. Johnstone Drive with Pacific Drive (shared path as proposed);
 - b. Separated cycle for Pacific Drive (an upgrade from the painted proposed lane);
 - c. Separated path from Pacific Drive to Fitzherbert Bridge; and
 - d. No roundabouts built on cycle route.
2. Infrastructure is developed to enable children to safely walk and cycle to the new school proposed for Peren Park (as we understand it is about to be built).

SO 57-5

I wish to be heard in support of my submission: YES

If others make a similar submission I will consider presenting a joint case with them at a hearing: YES