

# Proposed Plan Change G: Aokautere Growth Area

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Submissions 58 - 107

19 November 2022

# **SO 58-1**

## **PALMERSTON NORTH CITY DISTRICT PLAN**

### **FORM 5**

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

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

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

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

**Name of Submitter: CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd.**

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

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

The whole Plan Change and particularly those objectives, policies rules and related provisions that affect directly or indirectly the development of land labelled as “Fugle Interests” on page 13 of the master Plan document.

The submitter could not gain an advantage in trade competition through this submission. However, it is acknowledged that the submitters have ownership interests in a significant area of the land affected by the Plan Change.

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

#### **Background:**

This is a joint submission by CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd referred to as the submitters. CTS Investments Ltd owns a large part of the Plan Change land area northeast of Pacific Drive and east of Johnson Drive. Woodgate Ltd is the entity proposing to develop and operate a retirement village on part of the Plan Change area. Terra Civil Ltd is the land development company that is the agent for CTS Investments and Woodgate Ltd.

At the time of preparing this submission Woodgate Ltd has lodged a resource consent application for the retirement village which has been returned pursuant to Section 88 of

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the Act. Woodgate Ltd has challenged that decision. Also as a result of that decision Woodgate Ltd has lodged a separate resource consent application for earthworks on the retirement village site. This is being advanced to reduce further delay in delivery of development capacity on this site.

The submitters have played a lead role in the development of Aokautere over the last 30 years. This has included all the residential development associated with Johnstone Drive, Abby Road and associated areas.

The submitters are one of three major landowning interests associated with the Plan Change area as shown on the map page 13 of the Master Plan document being the land labelled as “Fugle Interests”.

### **General**

Plan Change G relates largely to land already zoned for urban development either residential or rural residential but extends that area to the east and south. In that respect it is not a new “Greenfield Residential Area”.

The Plan Change seeks to impose a specific design solution on the development of the area without any evidence on the market demand for different forms of housing in this location compared to other City locations or the economic feasibility of the design proposed.

In some location land is actually down zoned from Residential to Conservation and Amenity without any detailed s32 evaluation of that change.

The Plan Change represents a major shift from enabling development which is then designed by applicants and tested through the resource consent process to directing and imposing a specific design solution with little flexibility to adapt to market demands and detailed design.

This is implemented in a way for what is termed a “Structure Plan”. The submitters consider that what is proposed to be included in the Plan is not a structure plan but is in fact a detailed design master plan. This is borne out in many of the supporting reports not least being evidenced by the lead report being titled “Aokautere Masterplan”.

A Structure Plan is a broad framework to guide the development or redevelopment of an area by defining land use patterns and the nature and indicative location of required infrastructure including important transportation links. The District Plan already includes Structure Plans for the existing Greenfield Residential Areas of Whakarongo and Kikiwhenua that are in accord with this indicative approach.

This contrasts dramatically with what is proposed to be included in the District Plan through this Plan Change which shows every proposed residential lot, defined open space and neighbourhood centre site required to be in accordance with the Plan Change.

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What is even more concerning is that this approach is being imposed on the area without ensuring that the design visions and commercial objectives of the landowners/ developers who are required to fund and implement the development have been incorporated and an agreed design response advanced. This is despite a period of three years working on this Plan Change.

The submitters position is that a joint process should have been in place with the major landowners at the outset and a partnership process implemented to ensure that agreement was reached on feasible staged development ahead of notification of this Plan Change.

The submission should have been a submission wholeheartedly in support of the Plan Change but that is regrettably not the case. Concerns regarding this process have previously been expressed to Council officers. Fundamentally if the landowner developer is not satisfied that a design matches market demand and is economically feasible then the financial risk will not be taken and no development will occur until the conditions are suitable.

This is well illustrated by the direction to deliver a neighbourhood centre in accordance with the detailed concept on Map 7A. In the limited engagement that has occurred the submitters have expressed concern about the feasibility of this neighbourhood centre and oppose it being a mandatory requirement. The submitter also opposes the extent of medium density residential being directed by the Plan Change.

The issue is tested in the report for the Plan Change by Urbacity. This clearly states that to be successful and viable early in the development process the centre needs to be on Pacific Drive so that it is highly accessible to existing residential areas. The submitters agree with that position. Where it is proposed to be located will not be successful because, as Urbacity clearly state, the number of households necessary to enable the centre requires a high level of medium density but the medium density is unlikely to be successful without the early development of the centre. He recommends that the Council acquire land is the right location for the centre, being on Pacific Drive and tender out the construction and leasing of the centre. The submitters agree with his expert advice on that matter and the location of the centre should be relocated so that it is all on Pacific Drive and not just the corner of one site as currently proposed.

It is further illustrated by the last minute changes to accommodate the proposed retirement village within the Structure Plan just prior to notification of the Plan Change. This is despite the Council being fully aware of this proposal for more than 12 months and in that time being directly involved in the Ministry for the Environment led process to determine and application for project consents through the COVID 19 Fast Track Consenting Act.

The Section 32 evaluation claims to have engaged with the key landowners at various stages of the process but then states at para 108,

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*“There remains an element of risk around landowner reaction to elements of the Structure Plan approach “*

The submitters concur with that statement.

### **Specific:**

The submitters are very concerned to find fundamental errors in some of the supporting technical reports that underpin the Plan Change.

The Stormwater and Geotechnical reports and the Proposed Zone Plan Map show the Aokautere Church Stream extending through the North Village site to the existing residential area to the south east. In some reports this is also shown as an existing gully.

This is incorrect, there is no stream in this location and no gully. The gully was consented and filled in 2007/8 although the work was not fully completed.

This appears to have triggered a proposed wetland area at the heart of this residential environment on the terrace. This is opposed. It is not necessary to commit valuable development or open space area to wetland when there are ample other options including gully wetland treatment and rain gardens. Such an approach has been specifically opposed by Council itself in other cases. Further the GHD report does not recommend this option it just raises it as a possible option.

Gully stormwater detention is supported however the main location for this for the North Village area will be immediately behind the new gully crossing which combines efficient access connection with designed detention. Any structure plan should be amended to show this location for the detention. The broad location for this gully crossing is supported but the alignment shown is opposed. This matter is currently being addressed through LU6299 which provides for a gully road crossing and stormwater detention. The crossing of Gully G3 shown as “E” is also opposed as it is unlikely to be economically viable and other alternatives should be considered.

The submitters are also opposed to the retention of Map 10.1 which is superseded by Map 10.1A and should be removed as it is out of date and effectively replaced.

The provision for a retirement village within the structure plan is supported in principle. However, the site area should extend southeast to the existing residential edge. The Structure Plan seeks a road access connection through 153 Pacific Drive. This is possible but will likely be secondary access to the retirement village only.

The extent of medium density or multi-unit residential housing area is opposed. The quantum of medium density needs to match a careful assessment of market demand which should have been undertaken at the outset of this project. The promontory clusters also need to be tested as to feasibility given the road access development costs to these sites.

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The proposed gully edge road to Gully G3 is opposed in terms of the extent of undeveloped road frontage. A more nuanced approach is required that provides access to the gully with viewing points at that location and some breaks into the built form along this edge.

The structure plan includes a connection from Abby Road to Johnstone Drive across Gully 10. That connection has already been the subject of a Notice of Requirement to designate the work and is supported in principle. However, the submitters oppose the change from residential zoning to Conservation and Amenity Zone of the area of land immediately south of that gully crossing. This area of land has been previously partly filled and has not particular natural or amenity values. This land should be left as Residential Zone and its development enabled.

The submitters reiterate their opposition to the Neighbourhood Centre which should be located on Pacific Drive.

The submitters also oppose the added Assessment Criteria for Retirement Villages and Residential Centre added in at R 10.7.4 (k). A number of the design criteria are inappropriate for the environments that a retirement village will seek to create, nor are the prerequisite transport requirements necessary in all circumstances. Furthermore, it is apparent that these criteria are sought to apply to all Greenfield Residential Areas which parties with an interest in the other areas are unlikely to be aware of.

The submitters also oppose the requirement for transport network improvements before any subdivision and also the proposed Non Complying activity rules including R10.7.5.3.

All the above submission points all have implications for the objectives, policies and rule framework for the area. In short, the submitters oppose all aspects of the Plan provisions that are not consistent with the submission points above. In particular the submitters are opposed to the entire directive approach of the Plan Change and this has widespread implications for the Plan provisions.

This includes but is not limited to

Section 7A	Policy 4.6
	Policy 4.8
	Policy 4.9
Objective 5	Policy 5.1
	Policy 5.3
	Policy 5.4
	Policy 5.5

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Policy 5.8

Policy 5.9

Policy 5.15

Policy 6.6

7A.4 General

R7A.5.2.2

R7A.5.2.3

R7A.5.5

Section 10 Objective 15

Policy 15.1

Policy 15.11

10.4 Methods

R10.6.1.5

R10.6.3.2

R10.6.3.3

R10.7.4.6

R 10.7.5.3

Section 11 Objective 6

Policies 6.1-6.9

R11.10.2.1

R11.10.2.2

R11.10.3.2

R11.10.5

Section 15 Policy 1.5

R 15.5.4.1

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R15.5.5.1

R15.5.6.1

**The submitters wish to be heard in support of this submission.**

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

**Signed by** Privacy s7(2)(a) (on behalf of CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd):

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

..... **Date: 5 September 2022**

**Address for service:**

Privacy s7(2)(a)  
[Redacted address block]

**Telephone:** Privacy s7(2)(a)

**Email:** 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](http://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](http://pncc.govt.nz/aokautere)

### Emailing to:

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

## YOUR CONTACT DETAILS

First name **Transpower New Zealand Ltd** Last name

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.

Please see attached submission for full details

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.

Please see submission

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

Please see submission



**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

6 September 2022

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

5 September 2022

Palmerston North City Council  
Proposed Plan Change G Aokautere Urban Growth  
Private Bag 11-034  
Palmerston North  
By email c/- [michael.duindam@pncc.govt.nz](mailto:michael.duindam@pncc.govt.nz)

### Feedback on Aokautere Urban Growth

This is a submission by Transpower New Zealand Limited ("Transpower") on the proposed Plan Change G Aokautere Urban Growth.

### Background

#### Transpower and the National Grid

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid, that carries electricity across the country. The National Grid connects power stations, owned by electricity generating companies, to substations feeding the local networks that distribute electricity to homes and businesses. The National Grid is critically important, and nationally significant, infrastructure that is necessary for a reliable and secure supply of electricity throughout the country and that, in turn, supports national and regional growth.

The National Grid extends from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000km of transmission lines and cables and more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions. Transpower's Statement of Corporate Intent for 1 July 2022, states that:

*"Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:*

- as grid owner, to reliably and efficiently transport electricity from generators to distributors and large users; and*
- as system operator, to operate a competitive electricity market and deliver a secure power system."*

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. A key part of this is connecting new renewable energy generation to the National Grid – Transpower expects demand for electricity to increase over time as New Zealand transitions to a zero-carbon economy, and Transpower is uniquely placed to help enable that transition.

Transpower's strategy is set out in 'Transmission Tomorrow – Our Strategy'<sup>1</sup> that, in turn, reflects to 'Te Mauri Hiko – Energy Futures'<sup>2</sup> that considers trends around climate change and the ability for electrification to decarbonize the economy and highlights the potential doubling of electricity demand by 2050. Transpower's blueprint for a decarbonised economy is set out in Whakamana i Te Mauri Hiko – Empowering our Energy Future<sup>3</sup>.

<sup>1</sup> December 2018.

<sup>2</sup> June 2018.

<sup>3</sup> March 2020

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### Transpower's Assets and Electricity Transmission in Palmerston North City

Transpower owns and operates assets in Palmerston North City that supply electricity to the city, region and beyond. These assets are:

- Bunnythorpe-Haywards A 220kV single circuit transmission line steel towers;
- Bunnythorpe-Haywards B 220kV single circuit transmission line steel towers;
- Bunnythorpe-Whanganui B 110kV double circuit transmission line on steel towers;
- Bunnythorpe-Wairakei A 220kV single circuit transmission line on steel towers;
- Brunswick-Bunnythorpe A 220kV double circuit transmission line on steel towers;
- Bunnythorpe Ongarue A 110kV single circuit transmission line on steel towers;
- Bunnythorpe-Wilton A 220kV double circuit transmission line on steel towers;
- Tararua Wind Central-Tee A 220kV single circuit transmission line on single poles;
- Bunnythorpe-Woodville B 110kV double circuit transmission line on steel towers;
- Bunnythorpe-Whakamaru A 220kV single circuit transmission line on steel towers;
- Bunnythorpe-Whakamaru B 220kV single circuit transmission line on steel towers;
- Bunnythorpe-Mangahao A 110kV single circuit transmission line on single poles; and
- Bunnythorpe-Mangahao B 110kV single circuit transmission line on single poles.

In addition, Transpower operates substations at Bunnythorpe and Linton, Tararua Wind Central and Palmerston North DO (a communication centre).

Of specific interest to the Aokautere Urban Growth area is the Bunnythorpe-Wilton line, being 220kV transmission lines forming the National Grid located centrally through the site, as broadly shown in Figure 1 below:

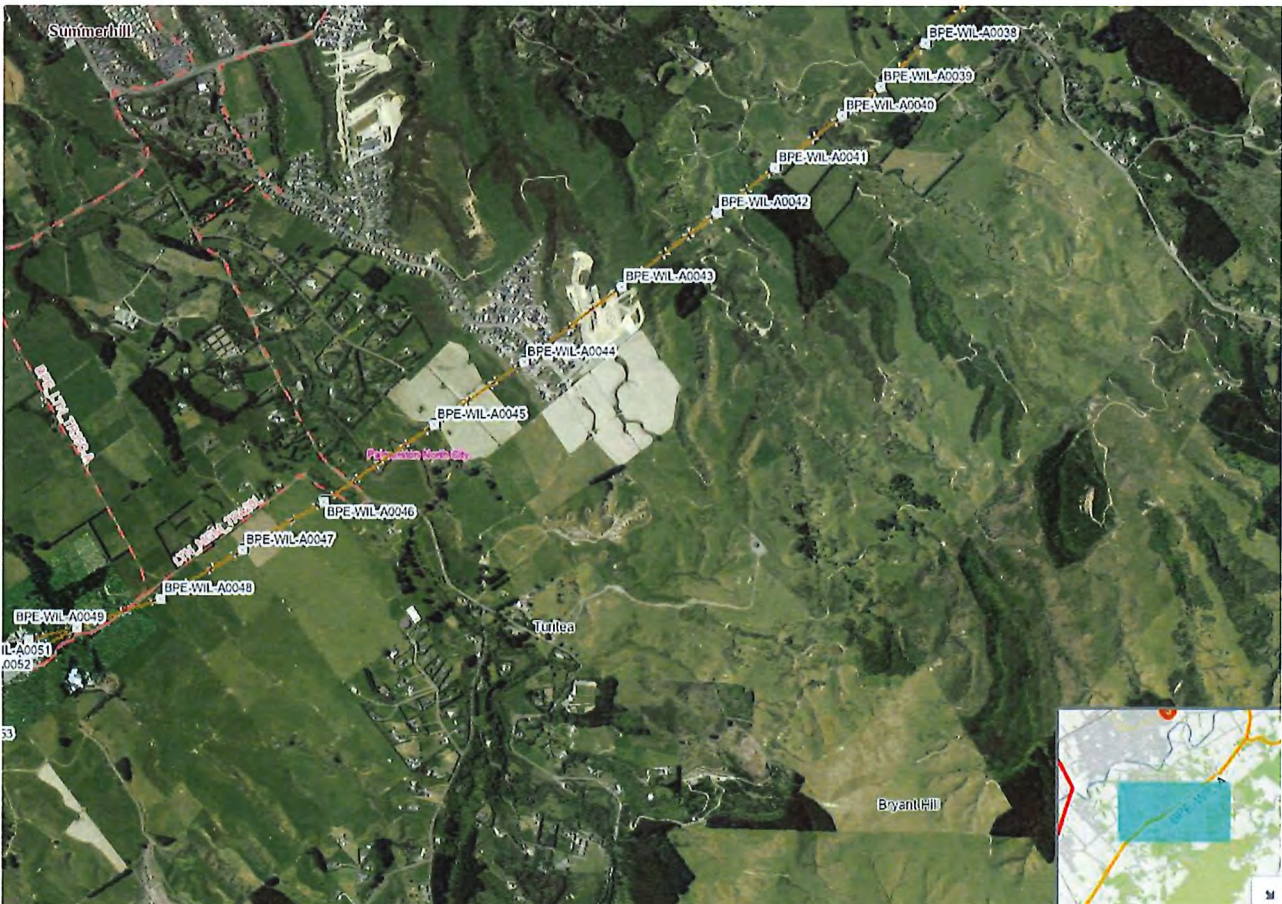


Figure 1: National Grid Transmission lines and structures in the Plan Change G area

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Transpower's Transmission Planning Report (2021) identified that the Central North Island region (which Palmerston North is part of) has a regional peak demand forecast growth to be an average of 2.4 percent per annum over the next 15 years, this is greater than the average growth rate of 1.6% per annum across all regions. The report identifies a number of upgrades to assets in Bunnythorpe and Linton and assets scheduled for replacement in Linton. Turitea is a new wind farm being constructed by Mercury Energy and new Transpower assets will be required to connect the windfarm to the National Grid. Turitea Wind Farm is located outside the current urban growth area, it is located close to the Linton Substation.

Transpower's assets (and their ability to be operated, maintained and developed) are essential to achieving development and growth, including that anticipated for the Aokautere Urban Growth area.

### The National Significance of the National Grid

The need to operate, maintain, upgrade and develop the National Grid is a matter of national significance that is recognised in an RMA context by the National Policy Statement on Electricity Transmission 2008 ("NPSET").

The single Objective of the NPSET is:

*"To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:*

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network."*

Of relevance to the Aokautere Urban Growth area, the NPSET recognises that ongoing investment in the National Grid and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.

Most transmission lines and substations were originally built in rural areas over open land which posed little to no constraint on the ability to operate, maintain, upgrade and develop the National Grid. Over time, urban boundaries have expanded and development has occurred under, and near the National Grid assets. Housing and other buildings and structures have been constructed under, and near, the National Grid without Transpower's knowledge or consent.

The NPSET was (in part) developed as a mechanism to provide better management controls. It contains policies which protect the National Grid from sensitive activities (including housing) being constructed under and near it. The NPSET also acknowledges that the operation, maintenance, upgrading and development of the National Grid can be significantly constrained by third party activities and development and requires such impacts to be avoided. In particular, Policies 10 and 11 of the NPSET provide the following direction that is directly relevant to the scope of the Growth area:

Policy 10:

*"In achieving the purpose of the Act, decision makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that the operation, maintenance, upgrading, and development of the electricity transmission network is not compromised."*

Policy 11:

*"Local authorities must consult with the operator of the National Grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent..."*

In the context of Palmerston North District, Policies 10 and 11 of the NPSET have been given effect to in the District Plan with provisions that regulate land use and development in a buffer corridor near the National Grid (particularly within Section 23: Network Utilities). We expand on the specifics of these requirements further below.

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### Transpower's Feedback

Transpower is grateful to have the opportunity to provide feedback on the Aokautere Urban Growth area. Transpower is generally neutral with regard to the principle of urban growth in the area. However, under the NPSET and the Operative District Plan, it is a matter of national significance that the operation, maintenance, upgrading and development of the National Grid is protected. Any growth or intensification close to the National Grid needs to be carefully considered taking in to account the development constraints established by the District Plan in relation to the Bunnythorpe-Wilton transmission lines.

There is existing pressure to allow for development close to the National Grid, any increase in potential density or development in these areas will add more pressure for people wanting to develop, under and near high voltage transmission lines and structures.

Development under and near high voltage transmission lines presents risks and needs to be managed carefully. It is critical that any development near the National Grid occurs in an appropriate and safe way, and this needs to be factored in at the growth development level. The framework established by the Operative District Plan National Grid Corridor provisions allow for this careful management to occur. This will ensure risks such as electric shocks are minimised to the greatest extent possible, access for vital maintenance and upgrade work is not constrained and reverse sensitivity effects are avoided, ensuring the infrastructure can continue to operate in the long-term, keeping the lights on for the community. If new land uses are properly located and managed, these effects can be reasonably managed. Transpower prefers, wherever possible, to manage risks proactively. Proactive management through appropriate planning provisions such as zoning and rules for the National Grid corridor is the most effective way of ensuring development occurs in a manner that is compatible with the National Grid and gives effect to the NPSET.

Consistent with the Operative District Plan provisions that regulate land use and development near the National Grid, it is considered that the National Grid corridor needs to be identified as a constraint, particularly in relation to residential development. The current documents and plans for urban growth areas however do not show the National Grid and it is therefore unclear whether the National Grid has been taken in to account. It is noted that there is no reference to the National Grid or Transpower in the Plan Change request or Section 32 report. Transpower was not listed as a stakeholder in which prior consultation was undertaken.

In specific regards to the Aokautere Urban Growth area is the two Bunnythorpe-Wilton lines, being 220kV transmission lines through the growth area. As these are double circuit steel towers lines the "National Grid Yard" setback from the outer edge of any National Grid support structure is 12m and 12m from either side of the centerline of the overhead National Grid line. Any new dwelling or sensitive activity within these setbacks should be a non-complying activity.

In addition, a National Grid Subdivision Corridor of 37m on either side of the centerline of the above ground National Grid line will apply. Any subdivision in this area is regulated by restricted discretionary activity status and is subject to a number of assessment criteria. Usually this requires consultation with Transpower, and Transpower's written approval will be required for subdivisions in this area.

Figure 2 below shows a number of recent dwellings constructed in close proximity to the National Grid, there appears to have been limited consultation with Transpower, either as part of the subdivision process or land use for the construction of the dwellings. It is noted that an attempt to provide a corridor under the lines has been provided, however this is less than the National Grid Yard setback requirements. The area to the west of Pacific Drive is approximately 8m wide and the area to the east approximately 6m.

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Figure 2: Development close to the National Grid along Pacific Drive

Transpower's specific relief sought, is set out below.

Given the national significance of the National Grid and the policy direction set by the NPSET, Transpower seeks:

- That the Aokautere Urban Growth area identifies the National Grid transmission lines on the relevant maps;
- That the NPSET is referenced in the Aokautere Urban Growth area documents, given the potential constraints that the National Grid may have on areas for urban growth; and
- Given the level of development detail indicated by the Structure Plans for the area, Transpower strongly recommends that Council carefully assesses the extent to which residential development may be constrained with reference to the National Grid Yard rules in the operative District Plan Sections 6 and 7 and any new provisions that will be required for the relevant residential sections (as required by the National Grid Yard setbacks) and factor this in to the growth.
- Amend Plan Change G to include specific provisions in relation to the National Grid, including the requirement to consult with Transpower for any subdivision within the 39m National Grid Subdivision Corridor (39m on either side) and for any land use structures within the 12m National Grid Yard (12m on either side). These should be specific to the new zone to avoid any potential confusion as to if they apply.
- The zone provisions and the maps need to be very clear that the National Grid is partly located within the area and that it is important that Transpower's need to operate, maintain, upgrade and develop the National Grid is a matter of national significance (recognised by the NPSET).

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### Outcome sought in Transpower's feedback

Transpower seeks that the Aokautere Urban Growth area is amended as set out above, or other such relief to achieve the same outcome, and that such recommendations are adopted in the final growth area.

Transpower is generally supportive of the approach in the Aokautere Urban Growth area to enable sustainable managed growth. However, the section 32 report will need to be updated to include the National Grid and what provisions should be included to address the impact on development. Additionally plans and provisions of the new zone will need to show the National Grid, as a potential constraint for growth area.

Transpower welcomes the opportunity to be involved further in the process.

Contact details are as follows:

P: Privacy s7(2)(a)  
E: Privacy s7(2)(a)

Yours faithfully  
**TRANSPOWER NZ LTD**



Privacy s7(2)(a)

Senior Environmental Planner



# SO 59-9

## Appendix A Transpower Asset Map for Palmerston North City

# Transpower Assets

## Palmerston North City

### Legend

Territorial Land Authority

Boundary

NZ Roads

Highways

### Transpower Assets

Cable Protection Zone

Overhead Fibre Cable

Underground Fibre Cables

Site

ACSTN

COMMS

HVDC

TEE

Transmission Line

0kV Overhead

11, 66kV Underground

11, 33, 66 kV Overhead

110kV Underground

110 kV Overhead

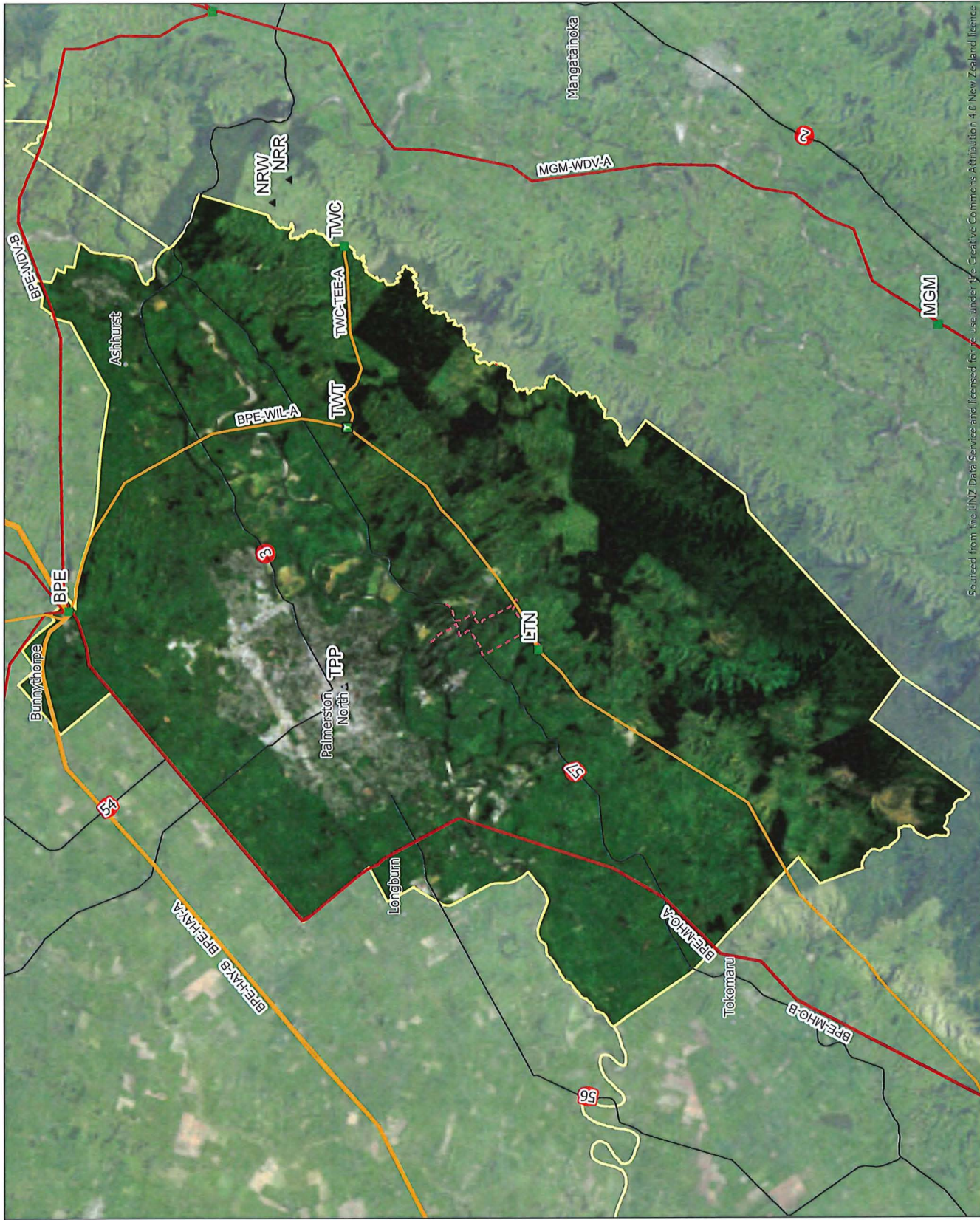
220kV Underground

220 kV Overhead

350 kV Overhead

350kV Submarine

400kV Overhead



**TRANSPOWER**  
Prepared by: Transpower Geospatial

Projection: NZTM 2000 Scale: 1:115,000 Plan Size: A3L



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Date: 8/04/2020 Drawn by: berrymannem

5 September 2022

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2022  
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Manager – Democracy & Governance  
Palmerston North City Council  
Private Bag 11-034  
PALMERSTON NORTH

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

Dear Sir/Madam,

**PROPOSED AOKAUTERE GROWTH AREA PLAN CHANGE – HORIZONS SUBMISSION**Introduction

Thank you for the opportunity to make a submission on the Proposed Aokautere Growth Area Plan Change.

At Horizons Regional Council (Horizons) we are striving to make our region a place where the land and water are healthy and the people are thriving. Our responsibilities include managing the region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

In terms of environmental planning, our integrated planning document the One Plan sets out four keystone environmental issues for our region – surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened indigenous biodiversity.

Horizons does not meet the criteria of gaining an advantage in trade competition through this submission and therefore is not limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991. Our interest in the proposed plan change is primarily as the regional authority for the affected area. In this submission we consider the proposed district plan change in the context of giving effect to the regional policy statement components of Horizons' One Plan, and ensuring that these changes would not be inconsistent with our regional plan provisions<sup>1</sup>. In addition, we are mindful that the National Policy Statement for Freshwater Management (2020) Section 3.5(4) directs territorial authorities to include objectives, policies and methods in district plans to address the adverse effects of urban development on the health and well-being of waterbodies, freshwater ecosystems and receiving environments. We also comment from the perspective of Horizons' role in leading and advocating for land transport outcomes in the region.

Horizons generally supports plan changes to provide for growth that have as their basis a structure plan and that align with urban growth strategic planning by the territorial authority. This approach is, in general, considered to give effect to One Plan Objective 3-3 and Policy 3-4, both of which provide for the strategic integration of infrastructure with land use. However, our submission seeks to ensure the proposed plan change also addresses our concerns as the regional authority for the affected area.

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<sup>1</sup> As set out in section 75 of the Resource Management Act 1991

### Flooding

There are a number of waterways, ephemerals and overland flow paths within this area. Palmerston North City Rapid 0.5% (1 in 200 year) Annual Exceedance Probability flood modelling has been undertaken to indicate water depths. As the flood modelling is Palmerston North City Council's (PNCC's) information and not that of Horizons, we cannot comment on its accuracy with respect to the flood risk. However, we note that the modelling shows that most of the modelled flood risk is within or near the waterways and within the gully system.

Horizons One Plan Policy 9-2 (Development in areas prone to flooding) generally discourages new habitable buildings or extensions to existing habitable buildings in areas that are likely to be inundated during a 0.5% AEP (1 in 200 year) flood event. However, where flood hazard avoidance can be achieved the activity may occur. Where the flood hazard cannot be avoided, Policy 9-2 states that the risk must be mitigated. **Horizons seeks provision for flood management that gives effect to One Plan Policy 9-2.**

### Land disturbance, erosion and sediment control

As noted in the section 32 report, "the topography of the plan change area exposes development to potential erosion/subsidence hazards". Horizons One Plan Policy 9-4 directs the way in which future development and activities in areas susceptible to natural hazard events must be managed. Horizons One Plan Policy 4-2 provides direction for small scale land disturbance, including when adjacent to some water bodies in "hill country erosion management areas" (land with a pre-existing slope of 20 degrees or more).

Horizons One Plan Chapter 13 includes rules to manage land disturbance, including in "hill country erosion management areas". Permitted activities are subject to compliance with conditions, such as Rule 13-1 which includes conditions to ensure erosion and sediment control methods are installed prior to and maintained during the land disturbance activity and to ensure that the works do not occur on land within 5 metres of the bed of a river that is permanently flowing, an ephemeral waterway within an active bed width greater than 1 metre, or a lake.

We note that Appendix 11 of the section 32 report refers to possible instream stabilisation to avoid erosion risk. **If erosion in waterways is considered a risk due to stormwater discharge, then this issue needs to be addressed prior to development.** We advise you to discuss potential consenting requirements with our Consents Team. One Plan Chapter 14 Discharges to Land and Water permitted activity Rule 14-18 includes:

*The activity must not cause erosion of any land or the bed of any water body beyond the point of discharge unless this is not practicably avoidable, in which case any erosion that occurs as a result of the discharge must be remedied as soon as practicable.*

At consenting stage, Horizons River Management Group will seek information to fully understand that the downstream effects from the development site (i.e. stream stabilisation within the gullies, network configurations (including pipe sizes, discharging locations, centralised storage locations) comply with Horizons' One Plan. Since bio-retention and detention storage require maintenance works, Horizons River Management Group will also seek the creation and implementation of a maintenance strategy.

### Stormwater management

There are two key aspects to the management of stormwater:

- i. the effects on water quality from direct (point-source) and indirect (diffuse) discharges of untreated stormwater, which may contain a range of contaminants,

- including hydrocarbons, sediment, nutrients and agrichemicals, and bacteria, into surface water bodies and groundwater; and
- ii. inundation and the potential for stormwater to become, or exacerbate, flood hazard.

With regard to the first of these aspects in particular, the National Policy Statement for Freshwater Management (2020) Section 3.5(4) requires that:

*Every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.*

With regard to the second of these aspects, One Plan Chapter 9 Natural Hazards regional policy framework specifically notes that 'flood event' excludes the effects of stormwater, as these effects are managed by territorial authorities through criteria such as engineering, subdivision and design standards and manuals.

However, One Plan Chapter 14 Discharges to Land and Water permitted activity Rule 14-18 allows discharges of stormwater to surface water provided conditions and standards are met, including that discharges of stormwater to land cannot result in overland flows discharging to natural surface water bodies other than in rain events that are at least the 10% annual exceedance probability design storm. Nor can any discharge cause or exacerbate flooding on any other property. We note that provisions have been proposed to achieve hydraulic neutrality, as is noted in the section 32 report:

*Ensure stormwater management achieves hydraulic neutrality through the development and that there is no increase in stormwater effects on surrounding areas. Related to this is the establishment and management of a 5m no build setback from the gullies to provide for stormwater management for the area.*

**In relation to stormwater management, Horizons seeks provision for stormwater management to achieve an outcome that is consistent with One Plan Rule 14-18.**

Furthermore, Horizons River Management Group encourage the use of on-site mitigation measures to control the rates of run-off from any development. Increased run-off from any developments has the potential to exacerbate downstream flooding issues, whether this be localised stormwater issues, or flooding from rivers, streams or other water courses. Additional stormwater generated by impermeable surfaces (e.g. new roading, concrete, buildings etc.) could exacerbate stormwater run-off and flooding. Provisions and housing/building density, should require development to provide appropriate permeable surface areas to minimise the effects of stormwater flooding.

Horizons River Management Group has reviewed the Stormwater Management Strategy in Appendix 11 of the section 32 Report. It proposes to attenuate the increased peak flow post development via bio-retention and flood storage. **Horizons River Management Group seek that the mitigation measures are completed prior to inhabitation.**

#### Indigenous Biodiversity

The One Plan uses a predictive approach to managing activities affecting indigenous biodiversity habitat, by describing habitats (in Schedule F) and identifying them as rare, threatened or at-risk. Activities affecting those habitats are regulated, with a non-complying activity status for rare and threatened habitats and discretionary for at-risk. Activities adjacent (within 5 or 10 metres) to some habitat types are also regulated.

Horizons does not identify specific sites in the One Plan, and does not hold exhaustive information on the location and state of all rare, threatened and at-risk habitat in the region,

particularly on private land. The information we hold (which shows indicative extents where they may be potential biodiversity sites) has been shared with PNCC during plan preparation and pre-notification consultation.

We are aware that an ecological assessment has been undertaken and that Schedule F habitats have been identified. We note that the One Plan regulates activities including land disturbance and vegetation clearance within 10 metres of any area of Schedule F wetland habitat; activities within the extent of any area of threatened habitat, including discharges of water and contaminants, are a non-complying activity. The National Environmental Statement for Freshwater (NES-F) also regulates activities in and within setbacks from wetlands.

**We raise a concern over the way the ecological assessment has grouped intermittent and ephemeral waterways together, as a fundamental step to the assessment.** We identify that 'intermittently' meets the definition of a river under the RMA, and thus it should be grouped with continually flowing waterways. The report considers anything that is intermittent/ephemeral to have 'low' constraint (table 2). We do not think this is appropriate, particularly in light of Policy 7 of the NPS-FM 2020, or in terms of activities in the bed of a river in the One Plan. Depending on the context, consent may be required under the One Plan for activities in intermittent streams. We note that the constraint value identified in this report is also carried through to the stormwater management strategy (in appendix 11 of the section 32 report).

In addition, **where the ecological assessment discusses water monitoring, gully 1 should not be considered appropriate for "before" monitoring in its current state.** This is due to the damage from illegal activity as a result of past development.

We also note that:

- discharge of stormwater to the Turitea Stream (a Schedule B SOS-A value in the One Plan) will require consent under rule 14.25, and
- Giant kōkopu, classified as at risk, declining have been found in Moonshine Valley Creek in the past. This is not currently recognised under the One Plan, but any discretionary consent assessments may take this into consideration.

### Transport

Horizons One Plan Policy 3-7(c) provides direction to territorial authorities in regards to sustainable transport options:

*Territorial Authority decisions and controls on subdivision and land use must ensure that sustainable transport options such as public transport, walking and cycling can be integrated into land use development.*

Parts of One Plan Policies 3-1, 3-2, 3-4 and 3-7 are included to give effect to parts of the Regional Land Transport Strategy 2021-2031 (RLTP), which seeks to protect the strategic transport network and create opportunity for the uptake of public transport options in the future. Horizons' comments on proposed provisions relating to transport networks, modes and safety are made in the context of the RLTP. The RLTP includes five regional objectives, of which the following are most applicable here:

- Transport users in the region have access to affordable transport choices that are attractive, viable and encourage multi-modal travel;
- The transport network is safe for all users;
- The impact of transport on the environment, and the transport system's vulnerability to climate change, is minimised; and
- Transport and land use are integrated to support well connected communities that promote a strong regional economy and liveable region.

Provisions will need to align with the strategic direction of the RLTP, as well as the Regional Public Transport Plan (2022-2032). The RPTP includes six regional objectives of which the following are most applicable here:

- Provide high quality, safe and accessible public transport infrastructure and information that supports an efficient and connected transport network, and multi-modal travel;
- Contribute to reductions in carbon emissions from transport and improving air quality through increased use of public transport and decarbonising the public transport fleet; and
- Pursue improved, equitable access to public transport across the region.

As the Road Controlling Authority for Palmerston North, PNCC has an important role in supporting public transport in the city. This is a role in which PNCC and Horizons Transport Team have a good working relationship and we would like to see this continued. **Horizons Transport Team ask that in developing the Aokautere area, PNCC takes a greater consideration of public transport for the area. Horizons seek the inclusion of provisions that require the development layout to enable the safe movement of public transport.** The location of infrastructure to enable public transport services should be strategically aligned with higher density areas and community facilities, including the neighbourhood centre.

Horizons Transport Team would like to highlight that the recently completed review of the Palmerston North bus network includes a bus route operating down Pacific Drive, making use of the turnaround point on Atlantic Drive. During the review, it was also identified that the Aokautere Growth Area should be provided with a second bus route, to be introduced once the area is more developed. This second route would also provide improvements in coverage to residents along Ruapehu Drive and Summerhill Drive, which is not able to be properly serviced with a single bus route.

A second bus route in the Aokautere area is not a matter of if there will be a service but when, with consideration for a second route to be include in future mid-term service reviews. It important that all future developments consider for the provisioning of public transport, with consideration into the roading network being designed in such a way that it enables development of the public transport infrastructure. We ask that consideration is also given to supporting multi-modal connections to the public transport network, given that the 'first mile and last mile' of a passenger journey will usually require them to use another mode of travel such as walking or cycling.

The Transport Team are happy to continue working alongside officers on the infrastructure needs of a public transport network.

#### Energy efficiency

Horizons One Plan Policy 3-7(b) provides direction to territorial authorities in regards to energy efficient development:

*Territorial Authority decisions and controls on subdivision and housing, including layout of the site and layout of the lots in relation to other houses/subdivisions, must encourage energy-efficient house design and access to solar energy.*

#### Productive land

Horizons' regional scale information has classified the site as LUC Class 2, 3 and 6. The One Plan Objective 3-4 and Policy 3-5 direct territorial authorities to consider the benefits of retaining Class 1 and 2 versatile soils for use as production land.

Conclusion

Horizons seeks the relief set out in its submission above, or any further, alternative or consequential relief that achieves the outcomes sought.

Horizons reserves the right to be heard in relation to this submission. If others make a similar submission, Horizons would consider making a joint presentation to the hearing panel.

Yours sincerely,



Privacy s7(2)(a)

**SENIOR POLICY ANALYST**

Address for service:

Privacy s7(2)(a)

Senior Policy Analyst  
Horizons Regional Council  
Private Bag 11025  
Manawatū Mail Centre  
PALMERSTON NORTH 4442

Email: 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](http://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](http://pncc.govt.nz/aokautere)

### Emailing to:

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

## YOUR CONTACT DETAILS

First name

Lastname

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.

Please see attached document

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.

Please see attached document

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

Please see attached document



**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.

5<sup>th</sup> September 2022

Palmerston North City Council

Submission – Proposed Plan Change G – Aokautere

via email: [submission@pncc.govt.nz]

### SUBMISSION ON BEHALF OF NGAWAI FARMS LIMITED

This is a submission on Proposed Plan Change G to the Palmerston North City District Plan: Aokautere Residential Area, made on behalf of Ngawai Farms Limited (Owner – Stu Waters).

#### Background

Palmerston North City Council (PNCC) is currently engaging with communities and stakeholders regarding issues associated with Proposed Plan Change G – Aokautere (Proposed PCG).

This submission has been made on behalf of the Stu Waters, who owns the southernmost portion of the land that is subject to Council's proposed rezoning. As such, he has a significant interest in the implications and limitations of the land being rezoned.

#### Submission

Mr Stu Waters is largely in support of PNCC's Proposed PCG. However, the following concerns have been raised:

#### *Loss of the rural-residential overlay and the introduction of Conservation & Amenity rezoning*

The table below demonstrates the current and proposed zoning of Mr Waters' property:

Current Zoning	Proposed Zoning (via Proposed PCG)
Rural Zone	Rural Zone
Rural Residential Overlay	Conservation and Amenity Zone
Designation	Rural Residential Overlay
	Designation

When comparing Council's current zoning and proposed rezoning outlined via Proposed PCG, dispersed portions of Mr Waters' land would be rezoned from Rural to Conservation and Amenity Zone. Also, the Rural Residential Overlay which once covered the entirety of the property would be severely limited to the central portion of the site.

The rezoning of land to Conservation and Amenity Zone would adversely affect Mr Waters in undertaking the current farming operation at the property. Although it is proposed that this land is vested with Council as part of the gully network, it would require the loss of land for Mr Waters thereby impacting on his economic wellbeing. Furthermore, the process of Council acquiring this land remains unclear and he would request that this be further discussed. He also requests that if these

sites are rezoned to Conservation and Amenity Zone as outlined in the PCG, how these sites would be monitored, managed, fenced off and restored.

The reduced Rural Residential Overlay, to the central portion of the site, would limit the development opportunity for Mr Waters. As a result of this, Council's requirements would be more stringent regarding subdivision potential and overall development of the property. The implications of removing the overlay limits Mr Waters any future development opportunity of his property. If Council seek to the rezoning of this land, Mr Waters seeks to retain the rural-residential overlay for his property zoned Rural.

#### *One residentially zoned block*

Located within Mr Water's property is a portion of land to be rezoned residential. As this property is not fully located within the boundaries of one owner, we seek this site to be rurally zoned and retain its rural-residential overlay.

#### *Un-zoned portion of the site*

In accordance with Appendix 2, the western portion of the site that has road frontage to Turitea Road would contain an area that does not have a zone. It is currently zoned Rural with the Rural Residential Overlay. Mr Waters would like this land to retain its rural zoning and requests a clarification of this zoning as it remains unclear.

#### *Council's access through the property (linkages with Turitea Road) and access to remaining property*

The Proposed PCG, in accordance with Appendices 2 and 3, demonstrates a roading network to be located on Mr Waters' property that provides connectivity to proposed peri-urban, local and urban connector roads and is an integral part of the proposed roading network. The acquisition of this land for roading purposes is detrimental to the current farming operation. Furthermore, there seems to be no provision for access to the rest of Mr Waters' property, adjoining to the northeast of the proposed rezoned area. However, provisions of future roading to the remainder of Mr Water's property could be provided via a revised structure plan that would include a roading extension from Council's Designation No. 106 – Aokautere Water Supply leading to the east to connect to the remainder of Mr Waters property.

A revised structure plan may need to include the provision for an alternative roading network contained outside of Mr Waters' property. This is on the basis that there is a limited provision on his property to be developed for residential purposes. The revised structure plan could explore the option for a direct connection to Turitea Road from Mr Green's property and an alternative route that diverts away from connecting to Designation No. 106 – Aokautere Water Supply.

#### *Rates*

Although not addressed in the Proposed PCG, Mr Waters would like a clear understanding of how the rezoning of his property would affect the rates. His concern is the sudden increase in rates at such time the Proposed PCG is to proceed.

#### *Acoustic assessment*

In accordance with Appendix 8, the acoustic assessment undertaken by Acousafe Consulting & Engineering Ltd concludes the following:

“The modelling demonstrates that a reasonable set back from the firing ranges is approximately 400 metres unless the ridgeline intercedes. It is recommended that no residential dwelling sites be located south of the ridgeline on the Waters Block”.

Although the imposition of a performance standard would thereby limit the residential development of Mr Waters’ property, the noise generated by the firing range should be dealt with at the time of future development rather than through the PCG process.

### Summary

The submission on Council’s PCG outlined in this document, on behalf of Mr Stu Waters, is **for** the PCG proposed by Council. Mr Waters seeks the following decision from PNCC:

- Retaining Mr Waters’ property in its original Rural Zone state and Rural-Residential Overlay;
- If Council rezoned portions of his property to Conservation and Amenity Zone, provision on the process of Council acquiring this land;
- The one residentially zoned property, in accordance with the PCG, within Mr Waters’ property to be retained as a rural site;
- Confirmation from Council regarding the zoning of the western portion of the site that has road frontage to Turitea Road;
- A revised structure plan to include provisions for providing roading access to the remaining of Mr Waters property to the north-east;
- An alternative roading network that does not include Mr Waters’ property;
- If Council require this land to provide the roading network proposed as part of PCG, the process of how Council will acquire this land;
- The sudden increase in rates if and when the property is to be rezoned;
- The acoustic assessment limits any future development of Mr Waters property which should be assessed at the time of subdivision.

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

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

Signed by Privacy s7(2)(a) (on behalf of Stu Waters):



Privacy s7(2)(a)

Privacy s7(2)(a)

5<sup>th</sup> September 2022

**SO 61-6**

Privacy s7(2)(a)

Address for service:

Stu Waters

Privacy s7(2)(a)

Privacy s7(2)(a)

Privacy s7(2)(a)

Privacy s7(2)(a)

Telephone:

Privacy s7(2)(a)

Privacy s7(2)(a)

Email:

Privacy s7(2)(a)

# SO 62-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Kat
Last name	Lyons
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:	Part 1 Section 2 - essentially the whole plan, due to its concentrating on greenfields development on the edge of our existing boundary.
My submission is:	<p>I am not in support of extensive greenfields development - that is, I am against us developing large tracts of land as proposed in this plan. Instead, we should develop upwards (several stories), on brownfields, especially on land closer to the city centre. This view is primarily due to the climate emergency. We need to conserve the vegetation that we already have, and we need housing to be built close to existing workplaces and infrastructure.</p> <p>Additionally, I am against development in Aokautere because building subdivisions far from the city centre does not encourage the residents to use active, low-emissions transport. Even with small workplaces and community hubs, Aokautere remains far from our main hospitality/entertainment, workplaces, high schools, medical services, etc. Instead, this plan encourages car-dependence. At best, the plan relies on Horizons providing excellent public transport, which it currently fails to achieve throughout the region, even within the city centre. Our existing cycling infrastructure is also abysmal - it is not safe and does not feel safe. The council needs to get this right, throughout the city, rather than to extend itself further as proposed here. We need to encourage people to cycle and walk to reduce the health, wellbeing, financial, and climate issues of</p>

## SO 62-2

	residents being car-dependent. The proposed subdivision does not achieve this.
I seek the following decision from Palmerston North City Council	I seek a rejection of this proposal in its entirety.
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 63-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Privacy 676
Last name	Privacy 676
Organisation	Waka Kotahi
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	<a href="#">Waka Kotahi Submission on Plan Change G LJ Issued.pdf</a>
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

Waka Kotahi NZ Transport Agency Reference: 2002-0745

5 September 2022

Proposed Plan Change G: Aokautere Urban Growth  
Palmerston North City Council  
32 The Square  
Palmerston North

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

Dear Michael,

**Submission on Proposed Plan Change G: Aokautere Urban Growth**

Attached is the Waka Kotahi NZ Transport Agency submission on the Proposed Plan Change G: Aokautere Urban Growth.

We welcome the opportunity to discuss the contents of our submission with Palmerston North City through out this process.

If you have any questions, please contact me.

Yours sincerely



Privacy s7(2)(a)

Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Taiao / Environmental Planning  
System Design, Transport Services

Phone: Privacy s7(2)(a)

Email: Privacy s7(2)(a)



FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

Submission on Proposed Plan Change G: Aokautere Urban Growth

**To:** Palmerston North City Council  
C/- Michael Duindam  
Palmerston North City Council  
32 The Square  
Palmerston North 4410

Via email: michael.duindam@pncc.govt.nz

**From:** Waka Kotahi NZ Transport Agency  
Waka Kotahi NZ Transport Agency

Privacy s7(2)(a)

1. This is a submission on the following:

Proposed Plan Change G: Aokautere Urban Growth

2. Waka Kotahi NZ Transport Agency (Waka Kotahi) could not gain an advantage in trade competition through this submission.

3. Role of Waka Kotahi

Waka Kotahi is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Rounding Powers Act 1989. The primary objective of Waka Kotahi under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by Waka Kotahi. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

(a) Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government Policy Statement on Land Transport 2021/22-2030/31 ('GPS').

(b) Waka Kotahi must give effect to the strategic outcomes set by the Government through the GPS. This sets out four strategic priorities, which are relevant to this plan change:

- **Safety:** Developing a transport system where no one is killed or seriously injured.
- **Better Travel Options:** Providing people with better transport options to access social and economic opportunities.
- **Climate Change:** Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.
- **Improving Freight Connections:** Improving freight connections for economic development.

(c) To deliver on the outcomes set by the GPS, Waka Kotahi have developed several strategies. A summary below is provided of those strategies relevant to this plan change; Arataki and Toitū Te Taiao.

- Arataki<sup>1</sup> is an evidence-based Waka Kotahi ten-year view on the step changes and actions needed to deliver long-term outcomes for the land transport system. It includes a national view as well as a regional view for the Manawatu-Whanganui region. The matters applicable to Palmerston North include:
    - Future residential growth will be supported in areas where there is access to multiple transport options to reduce reliance on private vehicles.
    - Changes to the nature of work for professional services could see a reduction in peak trips to city centre, because of more people working remotely.
    - There is a need to shift more people away from private vehicle travel to lower emission transport options.
    - An ongoing safety focus is needed to address high-risk roads, vulnerable users, motorcyclists and speeding.
  - Toitū Te Taiao<sup>2</sup> is Waka Kotahi sustainability action plan. This seeks to address the strategic challenges of reducing greenhouse gas emissions and improving public health. This strategy identifies an “Avoid Shift Improve” framework which includes:
    - **Avoid:** reducing the need to travel and/or the time or distance travelled by car, while improving or maintaining accessibility,
    - **Shift:** changing how we move e.g., shifting from cars to lower-emission types of travel (e.g., public transport, cycling and walking)
    - **Improve:** improving the emissions efficiency and the use of low-carbon fuels
- (d) The Ministry of Transport (MOT) has issued its ‘Outcomes Framework’ to define the long-term strategic outcomes for New Zealand’s transport system and explain how government and the transport sector should work together toward these outcomes.
- (e) The MOT Framework describes the following five long-term outcomes for the transport system:
- a) Inclusive Access
  - b) Economic Prosperity
  - c) Resilience and Security
  - d) Environmental Sustainability
  - e) Healthy and safe people
- (f) The National Policy Statement on Urban Development (NPS-UD) provides a framework which supports the strategic transport outcomes through the integration of land-use planning and infrastructure provision. The following extract from Policy 1 (iii) is of relevance from a transport / land use integration perspective:

*Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum...:*

- *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and...*
- *support reductions in greenhouse gas emissions; and*
- *are resilient to the likely current and future effects of climate change.*

#### 4. The specific provisions of the proposal that this submission relates to are:

<sup>1</sup> <https://nzta.govt.nz/assets/planning-and-investment/arataki/docs/arataki-at-a-glance-august-2020.pdf>

<sup>2</sup> <https://www.nzta.govt.nz/about-us/about-waka-kotahi-nz-transport-agency/environmental-and-social-responsibility/toitu-te-taiao-our-sustainability-action-plan/>



- (i) The Proposed Plan Change in its entirety to the extent the provisions have the potential to compromise Waka Kotahi's statutory obligations in terms of ensuring an integrated, safe, and sustainable transport system.
- (ii) Overall, Waka Kotahi has an interest in this plan change as a result of its role as:
  - Transport investor – to maximise effective, efficient and strategic returns for New Zealand.
  - Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers.
  - Provide or access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices. And
  - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.

**5. The submission of Waka Kotahi is:**

- (iii) Waka Kotahi opposes in part the Proposed Plan Change G: Aokautere Urban Growth for the following reason, which is explored in further detail below in Sections a)-c):
  - The plan change will generate growth contrary to the Palmerston North Integrated Transport Initiative ('PNITI') business case and the Accessing Central New Zealand (ACNZ) business case.
- (iv) Waka Kotahi is neutral but seeks further detail on portions of Proposed Plan Change G: Aokautere Urban Growth for the following reasons which are explored in further detail below in Sections d)-o):
  - The plan change may generate a Level of Service ('LOS') deficiency without appropriate mitigation or funding identified.
  - Greenfield urban expansion is better supported by identification within the Future Development Strategies.

Palmerston North Integrated Transport Initiative ('PNITI')

- (a) Proposed Plan Change G is inconsistent with the strategic direction established by PNITI which has been accepted in principle by Palmerston North City Council and Waka Kotahi. PNITI identifies routes throughout Palmerston North as regionally significant transport connections. PNITI supports significant investment to the tune of \$3-4 billion over the next 10-15 years planned for the region which will further cement the region's position as a critical part of New Zealand's distribution network.
- (b) The core inconsistencies generated by the proposed plan change is undermining the route preservation of State Highway 57. PNITI identified State Highway 56 to be detuned with the purpose of shifting heavy vehicles on to State Highway 57. Note that this is a long-term action of approximately 20 to 30 years. The preservation of this route is part of a wider interregional freight connection. This is also outlined in the ACNZ business case.
- (c) Plan Change G would result in development to be expanded along State Highway 57 ultimately requiring the speed limit to reduce from the current 70km/h to 50km/h from Albany Drive to Aokautere School with a 30km/h from Summerhill to Pacific Drive due to the pedestrian risk. PNITI identifies this section of SH 57 as reducing to 80km/h, only as part of the longer term actions in the 30-year programme. This increase travel time will likely decrease the desirability of this route for interregional travel. Waka Kotahi aims to minimise the segment of SH 57 impacted by reduced speeds in order to reduce severance, conflict with inter-regional freight, and increase freight efficiency.

### Safety

- (d) Waka Kotahi seeks further clarity on how the proposed plan change will manage and fund any upgrades that are required to the road network as a result of the development.
- (e) Waka Kotahi generally accepts the findings of Appendix 5: Transportation Assessment prepare by Harriet Fraser Traffic Engineering & Transportation Planning. However, Waka Kotahi wishes to highlight that the Transportation Assessment does not identify an existing LOS deficit along the core state highway intersections. Specifically:
- State Highway 57/Summerhill Drive has an existing LOS A (Table 3),
  - State Highway 57/Pacific Heights Drive has an existing LOS A (Table 4),
  - State Highway 57/Johnsonville Drive has an existing LOS A (Table 5).
- Note that LOS A is the highest identification.
- (f) The safety issues identified in Section 3.6 are found to be minor and non-injury crashes which do not indicate a current priority for safety treatments in the area.
- (g) The Transportation Assessment identifies a drop in the safety of the abovementioned state highway intersections as a result from the proposed development. Accordingly, any safety improvements required as a result of the development facilitated by the plan change could result in more than minor safety effects. At present, there is no clear understanding on how these upgrades are proposed to be funded. Waka Kotahi seeks that the plan change does not proceed unless the consequential infrastructure upgrades can be adequately funded. It is noted that the NLTF is unlikely to be sufficient.
- (h) Waka Kotahi acknowledge that there may be an existing pedestrian safety deficiency across State Highway 57 from IPU Tertiary Institute the residential areas on Pacific Drive. To improve the safety deficiency works are being considered under the walking and cycling program. Waka Kotahi is not in a position to confirm a solution to this deficiency at this time, however, will share the details with Palmerston North City Council once available. It is noted that these improvements were not identified through PNITI.
- (i) The plan change is likely to increase the worsening of pedestrian safety by way of increasing residents. Waka Kotahi seeks further information on how pedestrian safety across the state highway will be managed via the plan change.

### Active Transport and Vehicle Kilometres Travelled

- (j) Waka Kotahi supports the provision for a neighbourhood centre as part of Proposed Plan Change G. However, we acknowledge that the bulk of employment opportunities for future residents will generally be located beyond the Aokautere growth area. As such, signalling an underlying assumption that people will drive in and out of the city daily contributing to an increase in private vehicle movements.
- (k) The NPS-UD provides a policy direction for well-functioning urban environments which have good accessibility, including by way of public or active transport and support reductions of greenhouse emissions. This is strong guidance on the type of outcome which plans should be progressed; my interpretation is that new, state highway projects to service growth would not be well-aligned to this in most situations.
- (l) To achieve the outcomes sought by the GPS, behaviour change for mode shift must be given effect to. Waka Kotahi supports well-functioning urban environments which facilitate a reduction in emissions and supports shift mode. This will have an impact on our future investments, particularly those driven by growth when we are needing a reduction in vehicle kilometres travelled ('VKT').
- (m) Waka Kotahi is not in a position to endorse urban expansion of Aokautere on the basis presented in the proposed plan change that it's located adjacent to an existing urban environment. Waka Kotahi has a strong preference to delivering additional housing within existing urban environments.

- (n) Waka Kotahi seeks to encourage an increase in brownfield and urban areas prior to expanding into areas that are in conflict with strategic documents and those that will increase VKT.
- (o) Waka Kotahi seeks the establishment of the Palmerston North Future Development Strategy (FDS) prior to accepting greenfield expansion. The FDS and associated implementation plan (clause 3.18) are the key tools identified in the NPS-UD to achieve alignment between infrastructure investment and future land use outcomes. The implementation plan would be the most useful place to identify when/where/what infrastructure improvements are needed, including SH57.

**6. Waka Kotahi seeks the following decision from the local authority:**

- (i) Waka Kotahi seeks:
  - The plan change is declined in its current form, or the plan change is adapted to include:
    - a. Identification of how future development is to fund any upgrades to the state highway network required as a result of the development facilitated.
    - b. Clear coordination with the outcomes sought by PNITI.
    - c. Mitigation of worsening the active mode severance between SH57 and the plan change area.
    - d. Better integration of how active modes of transport will be provided for connecting the growth area with the city centre, schools and nearby amenities.
    - e. A more detailed analysis on how VKT and transport emissions reductions will be achieved.

**7. Waka Kotahi does wish to be heard in support of this submission.**

**8. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.**

**9. Waka Kotahi is willing to work with the Palmerston North City Council in advance of a hearing.**

Signature:



Privacy s7(2)(a)

Principal Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date: 5 September 2022



Address for service: Waka Kotahi NZ Transport Agency

Privacy s7(2)(a)

Contact Person:

Telephone Number:

E-mail:

Alternate Email:

Privacy s7(2)(a)



# SO 64-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Scott
Last name	Knowles
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:	General
My submission is:	<p>I'm voicing my enthusiastic support for the vision, courage and effort that has gone into the Aokautere Plan. I was impressed with its first iteration as presented at an IPC/IPU event in 2019, and I'm pleased to see that many features remain intact.</p> <p>As a long time resident of Pacific Drive, I would be directly impacted by this plan, but more importantly, by the consequences of a <u>lack</u> of such plan. I have watched the ad hoc growth of this area for two decades. It has produced a tangle of uncoordinated, opportunistic, unsympathetic developments that isolate people more than engage them. Every indication is that this will continue until the major landowners run out of green fields.</p> <p>This Aokautere plan is a comprehensive re-think of local development. Although not so novel in other parts of the world, it shows real stretch of New Zealand norms. I'm impressed that Palmy could become an example and national leader in residence planning! Truly, the good and thoughtful aspects of this plan are too numerous to list here. So I'll mention just a few issues that caught my attention.</p> <p>--What happened to the original full length 'Wetland Park' idea, whereby it had a long winding stream/reserve leading away from Royal Crescent (heading southeast)?</p> <p>--A retirement village and population is welcome. However there is a risk that it could be an uninspiring focus of the central area, with repetitive design elements and homogenous construction. Comparison could be made to Summerset at Summerhill or Speldhurst at Kimberley near Levin. Worse, it might be gated and off limits to neighbours, giving the unwelcoming feel of a privileged enclave or a prison, depending on your perspective.</p> <p>--I hope that the original design of 'Gully Edge Streets' is retained. The natural areas of gullies, slopes and streams</p>

## SO 64-2

	<p>should be enjoyed by everyone, not just homeowners with fortunate backyard views.</p> <p>--Has much consideration been given to enduring covenants over the sections? The elegance of the plan and the beauty of neighbourhoods could be lost over time as a succession of homeowners implement short-sighted self-serving modifications to home and grounds. The appeal of an Aokautere address should include confidence that housing won't be a free-for-all.</p> <p>--I support including well-planned rental accommodation. Aokautere living should be available even without a home loan. The examples of Simplicity Living build-to-rent might be studied.</p> <p>--Roading in and out of the suburb will be an issue for the 900+ new sections. I see from PNCC materials that traffic movement through the Summerhill / Aokautere / Fitzherbert areas has had much research and deliberation. I hope it works. Please keep your sights on a future where accommodating private cars isn't the first aim.</p> <p>--Kia kaha for your negotiations with major landowners Messrs. Fugle and Green. They are juggernauts of personal advantage.</p> <p>--Regarding repurposing Adderstone Reserve (a separated notification), I support this as it seems a necessary cost to realise the larger, greater vision of the PC G Aokautere Plan.</p>
I seek the following decision from Palmerston North City Council	Go for it!
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 65-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Steve
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 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 plans to develop near the Moonshine Valley boundaries
My submission is:	<p>Oppose many related to the above boundary.</p> <p>Submission on Proposed Plan Change G</p> <p>The issues I have with the PCG are as follows:</p> <ul style="list-style-type: none"><li>• Proposing housing proximity to the “gully” edge of Moonshine Valley property boundaries.</li><li>• Multi-unit housing positioning in “ghettos” along spurs closest to Moonshine Valley ‘gully’ edges.</li><li>• Adoption of storm water storage tanks as a strategy to minimise changes to existing natural water flow through and across the land.</li><li>• Storm water storage tank positioning.</li><li>• The impact from this new residential subdivision upon the existing specially zoned rural-residential Moonshine Valley subdivision.</li></ul>

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- The impact upon my own property, 30 Moonshine Valley Rd

The following section relate the above list items.

I find it hard to understand why the PNCC will allow building to be planned within a 5m setback of the 30 Moonshine Valley gully edge that represents the highest boundaries of 11 lifestyle properties. Turitea developments have been restricted to 15m and regarding gully/valley edges that are not, in my opinion, as at risk in terms of drainage that will affect existing natural water flow through and across the land, and of the adverse affect of noise and other urban characteristics such as increases in pollution, litter, and crime that may impact existing lifestyle property owners.

It seems bizarre to all the 30 Moonshine Valley residents with whom I have spoken that the proposal places multi-unit dwellings, apparently of at least 3 stories and 11m height (basically small blocks of flats), closely up against the highest boundaries of various Moonshine Valley lifestyle properties. The fact also that these flats will be segregated on spurs away from the predominant single dwellings means that a “ghetto” effect will be likely. The flats will undoubtedly be more affordable and it seems obvious that this design is intended to keep up the selling value of land for single dwelling sites thus making property more unaffordable and making more profit for the developer. Surely the PNCC should be promoting more affordable housing not allowing strategies such as this that will help boost prices. I would have though flats would be better being more central to the development and scattered around so that prejudices cannot build.

Adoption of storm water storage tanks/ponds as a strategy to minimise changes to existing natural water flow through and across the land is of great concern. There is not enough information provided on the actual size or design of these for me to be able to fully understand the strategy. What is obvious though is that the building work and the ponds will change the water table and the flow at the gully edges and any well thought out plan is reliant upon strict adherence by the developer, something that has not happened in the nearby developments so far. It is fact that the development so far has adversely affected moonshine valley streams and flora. It is obvious too that the ponds will present a risk of busting/leaking and they are being positioned so that any such unexpected flow will be down the gully sides of Moonshine Valley Rd properties. This just seems stupid.

I have been told that it is incumbent upon PNCC to ensure that any new subdivision does not have an adverse affects upon

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	<p>subdivisions, this would be especially so for the unique and specially zoned rural-residential Moonshine Valley that the PNCC has taken pains to nurture over the years. The plans in the PCG are contrary to this policy.</p> <p>My own property will be deeply affected by the current PCG. There will be a pond on the corner of our property immediately uphill from our stand of 40yr old pines, gums, redwood, and cherry trees. This ground here is very dry and the trees provide excellent shelter from southerlies. The root masses of these trees will be affected by change in either wetter or dryer condition caused by the pond and building drainage. Additionally these trees effectively provide a line of sight barrier (if incomplete) between the rear of our house, that includes bedrooms, and the 11m blocks of flats that are planned to look down at our windows. The trees will absolutely dominate the near view of the flats to the extent of blocking winter sun and most of the views that are described in the PCG as a reason for their positioning. Conversely if the trees die or fall due to the water changes then our previously idyllic lifestyle block will be overlooked by a multitude of dwellings. How can this be right?</p> <p>The impact of noise, pollution, litter, reduced privacy, crime etc from the planned building near our boundary will destroy the appeal/attractiveness of our home of approx 20 years. I believe that in obvious cases such as the Southerly positioned Moonshine Valley residents, that a more personal approach should be taken by the PNCC to better work in with existing lifestyles and to understand the impact of their plans.</p>
I seek the following decision from Palmerston North City Council	Consult more personally and proactively with affected property owners and redesign plans along the Moonshine Valley boundary.
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 66-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Jessica
Last name	Costall
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:	Rezoning farmland as an residential area, allowing up to 1000 new homes to be built
My submission is:	<p>While I recognise that Palmerston North has a growing population and needs more housing in the future, and in fact have submitted in favour of rezoning part of Adderstone Reserve for this purpose, I do not believe rezoning of such a large parcel of agricultural land in Aokautere is feasible or environmentally-responsible at this time. The scale of this proposed development is considerable and it will increase the reliance on cars, increasing air pollution and creating a less safe environment, particularly for pedestrians and cyclists. There is only one vehicle bridge crossing the Manawatu River within the current city limits and therefore there is only one key road leading between the CBD and Summerhill/Aokautere. Other river cities, notably Whanganui and Hamilton, have more bridges, and therefore have transportation networks that can cope better with new housing developments on either side of their rivers. Any increase in population on this side of the river will put a lot of extra traffic onto Summerhill Drive, the bridge and Fitzherbert Avenue. We have already seen a considerable increase in traffic along Summerhill Drive as a result of the new subdivisions around Johnstone Drive. People struggle to turn from side streets such as Ruapehu Drive, onto Summerhill Drive, especially if they need to make a right-hand turn. The Council needs to seriously consider installing traffic lights at these intersections.</p> <p>There are insufficient schools on this side of the river. While the Ministry of Education may build a new school in Summerhill in the future, this is unlikely to provide unmet needs for all levels of schooling – i.e., a new primary school may be built but it is unlikely an additional secondary school would be established. This will again, lead to traffic congestion along Summerhill Drive, particularly at peak times.</p> <p>The existing public transport options are not frequent or fast</p>

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	<p>enough to entice users. Express bus shuttles that go between the CBD and Aokautere may go some way to alleviating traffic, but only if services are frequent, reliable, and cheap – otherwise commuters will stick with the convenience of their own private vehicles.</p> <p>One of the major attractions of the Summerhill suburb is the rich network of walking paths and the planted gully network. But pedestrian safety will be compromised by an increase in traffic along Summerhill Drive. Pedestrian crossings need to be made safer, perhaps with traffic lights or even walkways that go above the road. I am in favour of extending a footpath on the Adderstone Reserve side of Summerhill Drive, connecting residents of the new subdivisions with the shopping centre.</p> <p>The existing gully network is not being adequately maintained. For example, newly established native plantings in Springdale Reserve are being rapidly overtaken by banana passionfruit and other noxious weeds, despite residents like myself attempting to carry out weed control themselves. It is all very well for the Council to say they will establish further walkways and plantings as part of this proposed redevelopment, but if they are not looking after the recreational areas that currently exist I am pessimistic about what will happen to any future plantings.</p>
I seek the following decision from Palmerston North City Council	<p>Do not rezone such a large area for residential housing, unless the Council is also willing to:</p> <ul style="list-style-type: none"> <li>- create frequent express bus services between Aokautere and the CBD, and heavily subsidise their fares</li> <li>- alter Summerhill Drive and other roads to improve pedestrian, cyclist and vehicle safety – by installing traffic lights at intersections such as where Ruapehu Drive joins Summerhill Drive, reducing speed limit to 50km/hr, improving pedestrian crossings, establishing a median strip for vehicles turning right off Summerhill Drive (this is not in place for residents of Springdale Grove/Heathcote Place, for example), and creating a physically separated cycle lane. Other roads will also need to be improved to accommodate higher traffic flow, for example, where traffic from Summerhill merges from the overpass onto Tennent Drive just before the bridge, and the short road linking downhill Summerhill traffic to Atawhai and Massey.</li> <li>- commit to establishing a second vehicle + pedestrian bridge across the Manawatu River in the vicinity of Aokautere</li> <li>- investigate whether housing needs could be met within the inner city – there are lots of vacant commercial buildings not being used and falling into disrepair, for example.</li> </ul>
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 67

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Jill
Last name	White
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:	I am supportive of the general proposals in this section of the proposed plan change. However, given the potential climate change situation faced in this country as elsewhere, it is critical that measurement and consideration of this aspect of future wellbeing is to the fore in deciding appropriate land use and its future protection.
I seek the following decision from Palmerston North City Council	That climate change considerations be to the fore when making stormwater management and other relevant decisions.
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 68-1

## 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:	Re-purposing of portions of Adderstone Reserve Creation of multi-unit housing Creation of access to and from Turitea Road
My submission is:	<p>Submission on proposed development of Aokautere</p> <p>Tēnākoutou katoa!</p> <p>This submission is made on the basis that I am a resident of Palmerston North and have an interest in the future of this high-functioning and agreeable city. I reside in the area under consultation. The following is written purely from a resident's viewpoint and I do not claim expertise of any kind in the professional and scientific disciplines relevant to the plan.</p> <p>Council's initiative towards generating a more orderly and functional development of the Pacific Drive area is to be welcomed. Essentially, however, the plan looks like a game of catch-up, because so much is already locked in by the existing development, as the draft plan acknowledges.</p> <p>Problematic features (where I think the catch-up is unlikely to redress matters, at least not fully) include:</p> <ul style="list-style-type: none"> <li>• remoteness from facilities and amenities, forcing most residents to make their journeys by car;</li> <li>• a series of bottlenecks from the side streets on to Pacific Drive and then from Pacific Drive itself on to Aokautere Drive (the new access to Aokautere Drive from Johnstone Drive does not significantly improve this situation);</li> <li>• narrow sinuous streets that militate against public transport;</li> <li>• housing built close to the lip of the gullies with little or no provision for soakage in an area where localised slips and slumping are clearly evident and potential exists for future subsidence;</li> <li>• a dearth of suitable locations on which to build multi-unit housing.</li> </ul>

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Despite the above reservations, most of which Council can do nothing about, the draft plan contains some good ideas to consider.

Of these I take first the proposal to create access into the suburb from Turitea Road. Resilience, particularly in an emergency, will be gained by the provision of this alternative route, which does not rely on Pacific Drive. At the same time, the proposed connections to the suburb from Turitea Road appear somewhat tortuous, to judge from the map. There will also be a bottle-neck where traffic has to exit on to Old West Road (westwards) or Turitea Road (eastwards), the latter followed by a second bottleneck into Summerhill Drive. These factors mean that predictably in practice most drivers will prefer Pacific Drive, as a wide relatively straight route. As a result, traffic volumes on that route will not be materially reduced. Traffic volumes are not high at present but we can expect them to increase markedly as the area becomes more built up. The same may apply to Turitea Road in due course.

Secondly, I take the proposed provision for multi-unit housing. This seems to me, in and of itself, a necessary and progressive step. At the same time, it will be difficult to implement effectively, as currently formulated. The draft plan envisages the construction of multi-unit housing at the very furthest reaches of the suburb, located at the far end of "necks" of land. I see two main problems with that:

1. These proposed locations place the multi-unit housing at maximum distance from Pacific Drive, which is, as noted above, the sole artery for the suburb. There seems to be no scope whatever, given the terrain and the existing street lay-out, for alternative arterial routes giving more immediate access to the proposed multi-unit housing.

It is precisely the residents of the multi-unit housing who might be most receptive to using public transport, were it to be made available. But, given the existing street lay-out (which really would be more appropriate in a gated community), buses will have to thread their way along narrow side-streets to reach the multi-unit housing. There is no apparent provision for turning circles or bus stops.

Residents of multi-unit housing might also be more inclined than other residents to use local shops but they could scarcely be more remotely situated from the existing shopping. Even the proposed small neighbourhood shopping centre by Pacific Drive south of Johnstone Drive will scarcely be handy, even supposing it is commercially viable.

2. A concentration of multi-unit housing on these narrow necks of land will drastically reduce their soakage capacity, with the attendant risk that stormwater and silt will spill over into the gullies below. This is already occurring, as is evident to anyone who monitors the state of the streams and ephemeral creeks that flow into the Manawatū River from the Aokautere side. Further destabilisation of this already unstable land is a likely outcome of the plan as conceived. Recent housing damage in Nelson, Wellington and Tauranga should teach us that what might at a stretch be viable today (or yesterday) will not be so in the fairly near future.

With these points in mind, a better location for high-density housing would seem to be beside the main artery, Pacific Drive. Most of the

## SO 68-3

	<p>sections along this road have long since been coopted for less intensive occupation but one exception is the Pacific Drive portion of Adderstone Reserve, whose future use is up for discussion as part of the current consultation. I suggest that here is a logical place to place multi-unit housing. If subsequently the IPU were to release some of its vacant land on the east side of Pacific Drive, the multi-unit housing could be extended northwards on to the IPU land. Residents in this location would have the advantage of easy access to existing public transport. They would also be within walking distance of existing local shopping (in the Summerhill Shopping Centre), which in turn would broaden the economic base for retailers and hospitality businesses.</p> <p>Third, I consider the proposed creation of additional reserves in the gullies. I see this as, in principle, another commendable idea in the draft plan. A concern, however, is how far this component is compatible with the remainder of the plan. In the existing development, housing presses up close to the lip of the gullies and in some cases property boundaries even extend down into the gullies from the flat land above. It seems extraordinarily shortsighted that that has been allowed to happen; the lack of a uniform clear demarcation between private property and reserve land will militate against systematic revegetation. Another problem, as I have already noted, is stormwater drainage, which has the potential to scour out the slopes below the proposed housing and carry silt into the streams, creating hostile conditions for aquatic life. For the gullies to become sustainable reserves they will need better protection than they appear to have at present or is envisaged in the plan.</p> <p>Fourth, as regards the other portion of Adderstone Reserve under discussion being repurposed for housing, I think this would be a good use of the land so long as adequate offsets can be allowed at either side, i.e. before the Adderstone and Mangaōtāne (Abby Road) gullies. That would help to reduce the stormwater problems referred to in my previous paragraph.</p> <p>Thank you for this opportunity to take part in the consultation.</p> <p>Nāku noa, nā Russell Poole</p>
I seek the following decision from Palmerston North City Council	n.a.
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 69-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Karen
Last name	Lyons
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:	Plan G
My submission is:	<p>I do not support the plan as it stands. Yes, we do need more houses as the population grows, but there needs to be more thought put into the plan.</p> <p>There is no or very little public transport, so emissions from cars will increase. Even with more amenities in the area children will still need to get to school/sport/after school activities. People will have to commute into town. One estimate has an extra 8000 car trips per day to Aokautere Drive.</p> <p>Any planned houses ought to cover a range of economic brackets - not just upper end houses.</p> <p>Generally in Palmerston North there needs to be more attention paid to going up rather than spreading out, not simply to have a denser housing area, but to allow for green spaces, not the ubiquitous concrete, around dwellings. This is even more important in greenfield developments such as the Aokautere one.</p> <p>Developments should avoid the "gated community" look such as there is now along Aokautere Drive. .</p> <p>Much better to encourage tree planting to screen traffic and its attendant noise.</p>
I seek the following decision from Palmerston North City Council	That the plan to build in Aokautere is delayed until Palmerston North has a more cohesive plan to reduce emissions and take the climate crisis into account when looking at how the city could grow.
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 70-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Epenesa
Last name	Faiiuaso
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 by the PNCC to rezone part of Aokautere from its current rural to a residential area. As the strategic plan indicates that there will be a shortage of housing (which is an issue we faced now) in the next 10 to 30 years. The new zone will help alleviate some of the housing issues.</p> <p>My concern is that the land will be developed with only financially profit in mind (short term) and not much of community aspirations (long-term) as well. An aspiration for many families, including our Pacific peoples, is to have home ownership which benefits their family and community but also future generations. These families are usually in lower social economic backgrounds and are from minority communities. The affordability and understanding of the process of owning your own home are very important to help those vulnerable in our community. I used the word 'home' not 'properties' (plural) as the gap between the wealthy (Landlords/developers) and poor (Renters) widens. If PNCC could provide help to reduce barriers to home ownership and enable equitable access for Pacific families. It is about allowing our Pacific families to have choices but this is difficult if they have not been included / afterthought in the process.</p>

## SO 70-2

	Ngā mihi nui for the opportunity to voice my concerns through this forum.
I seek the following decision from Palmerston North City Council	<p>PNCC recognise the difficulty Pacific people experience in finding options for housing within the Palmerston North area. Also, to have a system that creates equitable opportunities for Pacific People through:</p> <p>1) Council-owned properties in the new areas that meet the needs of our Pacific families.</p> <p>2) Assisting Pacific families (equitable resources) to access home ownership, for example, interpreters, and legal or financial support.</p> <p>3) Identifying an area in which Pacific providers can develop housing which meets the needs of our Pacific community.</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 71-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Susan and Yann
Last name	Le Moigne
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 Structure Plan Map 7A.3E
My submission is:	<p>1. We oppose connecting the existing Abby Road (Point E on the Aokautere Structure Plan Map 7A.3E) to the proposed subdivision on Adderstone Reserve and the adjoining land. We propose that the existing Abby Rd should become a cul-de-sac.</p> <p>This road is currently serving well the existing residents of Abby Road and Woodgate Rd. However, it is a narrow road and not suitable to become a connecting road to the proposed subdivision as the volume of traffic will be too great. The onstreet parking during the day and particularly in the evenings and weekends causes the road to become single lane and any further volume of traffic on Abby Road from the proposed subdivison will render it dangerous for drivers and for active transport users that use the road to connect to homes and Adderstone Reserve. Drivers will be dodging around parked vehicles and speeding to reach Pacific Dr. There is the high likelehood that with the proposed connection linking Abby Rd to Johnstone Drive, the existing Abby Rd portion will become a rat race as drivers try to beat the traffic between Johnstone Rd and Pacific Dr. This kind of driving behaviour is prevalent across all New Zealand cities and there is nothing to suggest it will not happen here as the traffic volumes and travel times increase due to the developments. We suggest the council change the existing connection to a cul-de-sac and all the traffic from the new subdivison is directed over the proposed connection to Johnstone Dr., where there is the choice to go left or right to leave the suburb. A shared off-road pathway for active transport users could then be created from Adderstone Reserve and the new development to the existing Abby Road, and this will provide a safe route for these users, along a much quieter road than is currently being planned. This would be in line with the PNCC's 2021-31 strategies of</p>

## SO 71-2

promoting safer active transport.

By allowing Abby Rd to be opened up to the proposed subdivision it then becomes an enabler to encourage people to use their cars rather than consider other transport options. By blocking the Abby Rd access to cars from the new subdivision but keeping open an off-road shared path, new residents may consider using active transport modes or walking to the public transport system on Pacific Dr. which is an efficient means of reaching the city centre, or to the supermarket on SH57. This thinking would be in line with the PNCC's 2021-31 active transport strategies where the measures of success are increasing walking and cycling, increasing bus passenger numbers, decreasing carbon emissions and decreasing reliance on private motor vehicles

2. We oppose No. 3 on Aokautere Structure Plan Map 7A.3E; Proposed Shared path on South side of Aokautere Drive between Johnstone Drive and Pacific Drive. We propose that it should be moved to the northern side of SH57 from Ruapehu Dr. to the Adderstone Reserve entrance

This shared path should be moved to the northern side (City side) between the RuapehuDr, it is wider and has a better view of the traffic coming from the east. The south side is narrow (especially at the Pacific Dr. point) and cyclists, walkers and other active transport users will be too close to the heavy traffic and high volume of vehicles that use SH57, particularly the large trucks coming from Hawkes Bay and that are traveling south (as well as the quarry trucks). It should be separate from the road, a white line and green paint will not protect users. Safe pedestrian/cycle crossings need to be installed across SH57 to help these active transport users safely navigate across this extremely busy road (only one (P) seems to have been proposed).

3. We propose that better protection for the gullies G1-G18 in the proposed plan is required.

Buffer zones of land approximately 30 metres wide between housing and roads and the gullies' edges should be created to help protect the gullies. Whilst not all the gullies have yet been planted out steps should be put in place to protect them before development takes place. Reasons for this are:

Water run-off: The hard surfaces of roads and houses will increase water run-off into the gullies which will cause sedimentation build up in the waterways, and increase the occurrence of slips which the land is prone to. Many small and medium sized slips can be seen happening in the gullies every wet season. A buffer zone will help absorb some of the water before it flows down some of the steep sided gullies, especially those which do not currently have any significant vegetation on them. All the gullies' waters flow eventually to the Manawatu;The PNCC's Palmy 2021-31 Eco city goal priority number 1 (pg 4) is to respect and enhance the mauri of the Manawatu, so protecting the gullies' margins with a



## SO 71-3

buffer zone will help meet this goal by reducing sedimentation and slips.

Emerging canopy trees: such as totara, kahikatea, matai, rewarewa, tawa and hinau and other trees will be at risk from pruning, poisoning or removal if housing is too close to the gullies, as they will potentially cause shade and block views, this is already an issue at the Pacific Drive end of Adderstone Reserve, with six twenty year old trees being felled by a neighbour.

Fly tipping by close-by residents: By having a buffer zone between the housing and the gullies, flytipping and green waste tipping into the gullies would be minimised. It will also reduce the temptation by the developers and builders to tip their waste into the gully as can be seen in Upper Pari, Manga-O-Tane gullies and elsewhere. Green waste flytipping will introduce noxious and invasive weeds in the gully as has happened in the past.

Encroachment by future property owners to use the common land for their own purposes as can be seen around many regenerating gullies where exotic and invasive weedy plants are planted amongst indigenous plants.

A buffer zone would also allow for walking paths to be created around the gullies and provide access into the gullies for revegetation, pest control and weed maintenance projects.

4. We propose that a safe off-road shared pathway through the proposed Aokutere development is provided for. There does not appear to be any safe off-road shared pathways allowed for through the proposed development. Off-road shared pathways allow for a wide variety of users from school children, elderly people, people with mobility issues, commuters, micro transport users as well recreational users to move safely around the neighbourhood.

Whilst there is a shared pathway at point Q in the Aokutere Structure Plan Map 7A.3E and useful for Valley Views it does not aid in helping active transport in the upper levels of the subdivision.

A planned off-road shared pathway through the development connecting all the various parts of the suburb would facilitate active transport use and reduce dependence on motor vehicle use. The Railway Reserve pathway in Nelson is an excellent example of such an off-road shared path, it links the city centre with Richmond. It has many access/exit routes along the way to different parts of the neighbourhood, a wide range of people use it for many purposes such as commuting, getting to school, shopping as well as for recreation. The high volume of people using this path is due to the fact that it safe and away from traffic and connects people to where they want to go, it is also planted out and doubles as precious green space for people to enjoy. With current government policies advocating for reductions

## SO 71-4

	<p>in gas emissions from transport and PNCC's own 2021-31 strategic goals for a sustainable, eco-city that encourages active transport then planning for a shared off-road pathway in the Aokautere Structure Plan as an alternative means for people of all ages and abilities to move about (not on the road) should be considered.</p>
<p>I seek the following decision from Palmerston North City Council</p>	<ol style="list-style-type: none"> <li>1. That the existing Abby Road end should become a cul-de-sac.</li> <li>2. That the shared pathway on SH57 is moved to the northern side between Ruapehu Dr and the Adderstone Reserve entrance.</li> <li>3. That there is better environmental protection for the gullies by providing a 30metre buffer zone between housing and roads and the edges of the gullies.</li> <li>4. That an off-road shared pathway through the Aokautere development for active transport users is provided for.</li> </ol>
<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>	

# SO 72-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Kerry
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 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:	Proposed plan change G: Aokautere Urban Growth - additional housing supply Aokautere structure map 7A.3E Adderstone reserve alternative
My submission is:	My submission opposes the proposed plan change G to provide for additional housing because of the increased demands the proposed storm water management system will have on Moonshine Valley and the adverse effects created by erosion, due to storm water being directed to the Moonshine Valley water catchment area. Please refer to the attached letter and photos
I seek the following decision	I would like to see any multi unit housing taken well away from the gully's that the current proposal has them adjacent to. This is to reduce the negative impact of storm

# SO 72-2

from  
Palmerston  
North City  
Council

water on the surrounding gullies and streams.  
Please refer to the attached letter and photos.

[floodpic2.docx](#)  
[floodpic1.docx](#)  
[Kadd.docx](#)



Supporting  
informatio  
n



Hearing

## SO 72-3

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 72-4

Attachment 3 Kadd.doc

Kerry Park

Privacy s7(2)(a)

Manager – Democracy & Governance  
Palmerston North City Council  
The Square  
Palmerston North 4410

submission@pncc.govt.nz

5th September 2022

## **Public Notice of proposed district plan change G: Aokautere urban growth**

Aokautere Structure Plan Map7A.3E (Adderstone Reserve Alternative)

Stormwater Management Strategy

I wish to have amended the D1-D5 multi-unit housing proposal.

The Tutukiwi Reserve stream runs adjacent to my property border and in periods of moderate to heavy rainfalls, the water has increased from a 3-metre stream into a 20-metre torrent and has at times, submerged the whole corner of the Tutukiwi Reserve bordering my fence line. In these instances, the 3-metre stream becomes a 50-meter flood plain.

On 23<sup>rd</sup> 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.

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.

The Adderstone Reserve public walkway is already showing signs of erosion, making it dangerous for the public to enjoy this communal area.

## SO 72-5

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.

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.

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.

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.

Regards

Kerry Park

Privacy s7(2)(a)

# SO 72-6

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Kerry
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 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:	Proposed plan change G: Aokautere urban growth Aokautere structure plan Map 7A.3E Adderstone Reserve Alternative
My submission is:	My submission opposes the proposed plan change G: Aokautere urban growth, for issues relating to, high density housing, increasing CO2 emissions and storm water issues. Please refer to the attached letter outlining the reasons for my objection.
I seek the following decision from Palmerston North City Council	Moving this proposal into the city to take advantage of existing infrastructure will mitigate CO2 emissions and will alleviate erosion and storm water damage to an area that is already prone to regular flooding. Please refer to the attached letter.
Supporting information	<a href="#">AOKrezone.docx</a>
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 72-7

AOKrezone doc.

Kerry Park

Privacy s7(2)(a)

Manager – Democracy & Governance  
Palmerston North City Council  
The Square  
Palmerston North 4410

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

5<sup>th</sup> September 2022

## **Proposal to uplift reserve status and dispose of part of Adderstone reserve under the reserves act 1977**

Aokautere Structure Plan Map7A.3E (Adderstone Reserve Alternative)

I would like this proposal amended on the grounds that bringing 1000 homes into an area away from the city will not help to reduce CO2 emissions. Very many more vehicles will be needed to transport residents to and from their homes, thus adding to the burden of endeavoring to find ways to reduce CO2 emissions.

Aokautere is on the borders of rural and residential zoning and is not within walking distance of the city. CO2 emissions are therefore very likely to rise.

The tranquil ambience of Aokautere will be disadvantaged by imposing multi-unit housing, in turn degrading the appeal of living in a peaceful environment, on the outskirts of the city.

Soil erosion is another clear reason that rezoning part of Adderstone reserve, with its characteristic gully's is not the best place for this proposed development. Erosion is already evident in the Adderstone reserve community walking space and is now a potential danger to anyone making use of this public area.

My recommendation is to secure an equivalent parcel of land within the city to maintain future housing needs. The infrastructure is already in place, of which, any future development will impact on this infrastructure far less than the proposed development of Adderstone reserve.

Regards  
Kerry Park

# SO 73-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Kevin
Last name	Low
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 covers the entirety of the plan but specifically relates to Section 1; Transport, Section 6; Landscape, Section 8; Neighbourhood centre, and Section 9; Parks and Reserves.
My submission is:	<p>I am delighted that Council has decided to take a lead on shaping one of the more important growth locations in the city. I have observed the neighbourhood grow over the last two decades without any overarching strategy and at the whims of developers. The result to date exhibits a startling similarity to the worst outcomes sung about in the folk song Little Boxes written in the 1950's and popularised by its use as the theme tune of the TV series Weeds.</p> <p>Since that time, most cities have migrated away from bland, cookie-cutter style and vehicle-centric plans for building new communities and, in recognition of the current climate change emergency, are embracing new concepts such as co-housing, shared services, and 15 minute neighbourhoods (where basic services are no more than a 15 minute bike ride or walk away).</p> <p>Regrettably, I see little evidence of Council or their experts addressing transport (1), Landscape (6) or retail (8) have considered the mandated need to halve net emissions by 2035, and no attempt to comply with the Government target to reduce vehicle kilometres travelled by 20% by the end of this decade.</p> <p>I would like to see the plan expanded to incorporate elements of the following;</p> <ul style="list-style-type: none"><li>+ A primary school</li><li>+ A day-care centre</li><li>+A sports field</li><li>+Two village centres with facilities such as a convenience store (not supermarkets), cafe, variety takeaway food, and chemist or medical centre.</li></ul>

## SO 73-2

	<ul style="list-style-type: none"> <li>+Consideration to shared household amenities along the principles of co-housing.</li> <li>+Provision for storage in each street or group of dwellings for shared amenities such as shared vehicle, cycles, lawnmowers, gardening implements and storage.</li> <li>+Remove zoning limitations to allow for light commercial activity such as shared office communities to be within walking distance.</li> </ul>
I seek the following decision from Palmerston North City Council	<p>That the plan change process and housing consents be stopped until such time that the following issues are addressed;</p> <ul style="list-style-type: none"> <li>+That a plan can be demonstrated to comply with the council-adopted statutory requirements that council has with regard to reducing net emission by 30% by 2031.</li> <li>+That housing developers be required to demonstrate compliance of their plans to meet a reduction of vehicle kilometres travelled by 20% by the end of this decade.</li> </ul>
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 74-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Elizabeth
Last name	Endres
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:	Rezoning land for Multi unit residential housing Repurpose Adderstone Reserve for housing
My submission is:	<p>I absolutely oppose multi unit housing in this area of Aokautere.</p> <p>This type of housing belongs in the inner city not in a semi rural area This high density housing on land prone to slips is a recipe for disaster. You only need to look at the number of subsidence events in the area. Extreme weather events are now occurring regularly and are no longer 1 in 50 and 100 year events as has been experienced this year alone. We should be learning from these events and not trying to mitigate disaster as this plan appears to try to do. High density housing is going to create considerable more run off and compound already problematic stability of the extensive gully network.</p> <p>I also absolutely oppose any housing within the Adderstone Reserve.</p> <p>We should be preserving our reserve areas and commending the green corridors folk that have done an amazing job of planting the area. These gully areas are delicate ecosystems and should be left well alone.</p>
I seek the following decision from Palmerston North City Council	<p>To abolish all multi unit and high density housing in this area of Aokautere.</p> <p>To leave Adderstone Reserve as a green space with no housing.</p>
Supporting information	
Hearing	
I wish to be heard in support of my submission	No

## SO 74-2

If others make a similar submission, I will consider presenting a joint case with them at a hearing	No
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# SO 75-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Gareth
Last name	Orme
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 structure plan, Map 7A4E
My submission is:	<p>Submission referring to: Proposed Plan Change G: Aokautere urban growth</p> <p>I certainly support the stated principle: 'Building a connected community'</p> <p>My input is around the integration of this expanded area in relation to its periphery. This extends to the safety and hauora of not only those who will populate this extension of Palmerston North but also the current residents.</p> <p>This largely arises from the capacity increase to vehicle traffic, pedestrians, personal electric commuters, cyclists and services. It also extends to infrastructure management with a focus on storm and wastewater management.</p> <p>The recent impact on Nelson, Marlborough and its capacity to handle extreme water run-off exposed the flow on effect of developing areas above populated valleys and sloping land; we need to be cognisant of the 'whole of system'.</p> <p>The impact:</p> <p>Assuming 1000 new houses, with an average of 2 vehicles per household (2018 census) then there is inevitably an increase to traffic of (conservatively) 1000 cars commuting to work, school, errands at each end of the day, the bus services, contractors, maintenance, visitors.</p> <p>Access:</p> <p>There is a growing risk with the notable increase in population on the eastern side of the Manawatu River and that is concentrating all of the traffic and access through the Fitzherbert route. Over and above the inherent risk created with the sheer volumes of 1000 new households and the ancillary activity it creates, there will be a time when the entire "Massey side" will have limited or no access to the city</p>

## SO 75-2

	<p>over the Manawatu river and this clearly will have a financial and safety impact. Since the residential area is growing on the eastern arm of Summerhill and north-east of Pacific Drives it would be logical to create a secondary access route into the city across the Manawatu River east of the current route. This would further diminish the necessity to cross dangerous intersections for current residents.</p> <p>There is currently notable risk for residents exiting the Johnstone Drive, Pacific, Ruapehu, Silkwood and Cashmere intersections in vehicles and far greater risk for cyclists and pedestrians.</p> <p>In the immediate term there needs to be consideration of Intersections of:</p> <ul style="list-style-type: none"> <li>o Cashmere Dr. and Aokautere Dr/SH57</li> </ul> <p>A good candidate for a roundabout</p> <ul style="list-style-type: none"> <li>o Ruapehu Dr and Aokautere Dr/SH57</li> </ul> <p>Inclusion in the signalled Pacific Dr. intersection design; or Hard median protected merging bay (right turn from Ruapehu to SH57)</p> <ul style="list-style-type: none"> <li>o Ruapehu Dr and Summerhill Dr</li> </ul> <p>Potential for a signalled intersection</p> <ul style="list-style-type: none"> <li>• (concern around hidden queues over crest of Summerhill during peak flow)</li> </ul> <p>Critical safety:</p> <p>(P) Map 7A4E - New pedestrian crossing: less than ideal place for a crossing as it is just around a bend when heading east then ensuring the first few cars that stop are at risk of being rear-ended by traffic flowing from the city. Alternative might be between Cashmere Dr and Silkwood Place where there is notably better visibility.</p> <p>Hauora and community:</p> <p>Provision for properly constructed leisure parks – not just green area – create a community atmosphere.</p> <p>Adequate drainage to allow the land to be usable</p> <p>Seating, trees, paths, children’s areas</p> <p>Flat turf for neighborhood games (e.g. Football, cricket pitch/nets, touch, petanque, tennis ...)</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>Specifically the intersections referred to in the above submission:</p> <ul style="list-style-type: none"> <li>o Cashmere Dr. and Aokautere Dr/SH57</li> <li>o Ruapehu Dr and Aokautere Dr/SH57</li> <li>o Ruapehu Dr and Summerhill Dr</li> </ul> <p>The placement of Pedestrian crossing (P) in map 7A4E</p>
<p>Supporting information</p>	
<p>Hearing</p>	
<p>I wish to be heard in support of my submission</p>	<p>No</p>

## SO 75-3

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

No



# SO 76-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details		Rifle Rod & Gun Club Manawatū
First name	[Redacted]	
Last name	[Redacted]	
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:	Rifle Rod and Gun Club Manawatu Inc oppose changing the "PNCC Proposed Plan Change G - Aokautere Urban Growth" land zoning from rural to residential. This would mean we would share our boundary with residential zoned properties, or be in close proximity to residential properties, with the increased potential for noise complaints.	
My submission is:	<p>Rifle Rod and Gun Club Manawatu Inc. oppose the re-zoning of the land.</p> <p>By opposing the re-zoning of this land, we are flagging our concerns about the Club being subject to noise complaints. The discharge of firearms always has the potential for noise complaints. Being close to residential properties means the Club would almost certainly face opposition from new neighbours.</p> <p>With re-zoning we would have an increased number of neighbours. All these neighbours would be zoned residential.</p> <ol style="list-style-type: none"> <li>1. This higher density of neighbours increases the probability of noise complaints.</li> <li>2. District plan noise limits of residential properties are significantly lower than rural zoned properties. Again, this increases the probability of noise complaints.</li> <li>3. Amenity noise expectations of owners and occupiers of residential properties are much lower than those living in the rural zone, and this will result in increased complaints being received by the Club and by Council.</li> <li>4. The Club is concerned about reverse sensitivity issues that will arise from the plan change.</li> </ol> <p>The Club has been existence since 1946. Rifle Rod and Gun Club Manawatu Inc. has been in operation at our current address of 333 Turitea Road, Palmerston North since the early 1960's. The Club has maintained a good relationship with its neighbours for all this time.</p>	

## SO 76-2

	<p>The Club already manages the noise coming from our property by:</p> <ul style="list-style-type: none"> <li>• Managing the hours of operation             <ul style="list-style-type: none"> <li>o 9am to 5pm in winter months</li> <li>o 9am to 6pm in summer months</li> <li>o No shooting on Christmas Day</li> <li>o No shooting until 12 noon on ANZAC Day</li> <li>o Suspending shooting when requested by neighbours for local weddings and other special occasions.</li> </ul> </li> </ul> <p>The club contributes to the public good by allowing the NZ Police to train their staff in firearms proficiency at the Club, and by providing a safe and professional teaching environment where young people can gain sporting skills for hunting and international competition.</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>Rifle Rod and Gun Club Manawatu Inc. oppose the re-zoning of the neighbouring land.</p> <p>If the land was to be re-zoned then the Club would require any homes and businesses built with one kilometre of our property be built with professionally designed and approved insulation, in conjunction with no complaints consent notices on properties.</p> <p>If the land was to be re-zoned any PNCC consent should include that the land owners are aware that a Gun Club is within close proximity .</p> <p>As a further mitigation measure, we request there is a clear demarcation point at the top of the ridgeline of the Waters property which provides significant noise buffering to any residential development further to the north. Any land or any dwellings constructed on the ridgeline or south of it will experience RRGc activity noise in an unimpeded way with only distance providing any respite.</p> <p>Potential dwelling sites to the west of the Waters farm access road will also be directly exposed to RRGc noise except they will be further away.</p> <p>Rifle Rod and Gun Club (Inc) wish to be heard in support of our submission.</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	No

# SO 77-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Privacy s7(2)(a)
Last name	Privacy s7(2)(a)
Organisation	Te Ao Turoa Environmental Centre Rangitāne o Manawatū
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:	Please see attached submission document
My submission is:	Please see attached submission document
I seek the following decision from Palmerston North City Council	Please see attached submission document
Supporting information	<a href="#">Submission PROPOSED PLAN CHANGE G final .pdf</a>
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



# PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

## SUBMISSION TO

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

ATTENTION: DEMOCRACY & GOVERNANCE MANAGER

## SUBMITTER INFORMATION

I ngoa TE AO TUROA ENVIRONMENTAL CENTRE

I wi RANGITĀNE O MANAWATŪ

**Wāhi noho** Privacy s7(2)(a)  
[Redacted]  
[Redacted]

**Īmēra** Privacy s7(2)(a)

**Waea pūkoro** Privacy s7(2)(a)

Kaiwhakahaere

Privacy s7(2)(a)

# MY SUBMISSION IS

## INTRODUCTION

### TE AO TUROA ENVIRONMENTAL CENTRE

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

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

### **RANGITĀNE O MANAWATŪ**

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

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

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

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

## SO 77-4

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

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

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

Traditional entry to the Manawatū interior was gained by paddling and poling waka along the Manawatū Awa. At each major river bend, a permanent or seasonal village or pā existed within our history.<sup>3,4</sup> The awa linked hapū (family groups) together to form who we are, now known as Rangitāne o Manawatū. We are a collective of six different hapū. Hapū members work closely together and each hapū has a representative on the Rangitāne o Manawatū Settlement Trust. This collaboration forms one avenue of mandate for Rangitāne as an iwi authority.<sup>5,6</sup>

### SUMMARY

In 2020, TATEC produced a Rangitāne o Manawatū cultural impact assessment (CIA). It discussed the landscape context within Aokautere as one of the earliest settlement sites in the Manawatū for Rangitāne. Aokautere Pā was situated on the eastern bank of the Manawatū River and was named in honour of the Rangitāne chief Te Aokautere who lived in the late 18th and early 19th centuries. Many historic Rangitāne settlements connect

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

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

<sup>5</sup> *Treaty of Waitangi Claims: Wai 182 the Manawatū Claim*. Retrieved on June 1st, 2021 from <https://www.tmi.maori.nz/Treaty.aspx>

<sup>6</sup> *Rangitāne o Manawatū: Deed of Settlement documents (2021)*. Retrieved on June 1st, 2021 from <https://www.govt.nz/browse/history-culture-and-heritage/treaty-settlements/find-a-treaty-settlement/Rangitāne-o-Manawatū>

## SO 77-5

with Aokautere, including Te Motu o Poutoa, Te Kuripaka, Makomako, Ti Rākau, and Turitea Pā. The area was strategic for communication and protection in the wider Manawatū. Residents of the lower terraces seasonally trekked into the Tararua Range for hunting and gathering. Within the lower terraces of Aokautere were extensive kumara cultivations and Māori gardens of karaka. A series of kumara pits and Karaka Grove still exist and are protected archaeological sites. Accidental discoveries of bones, adzes and oven stones have occurred over the years throughout Aokautere.

Esler describes the prominence of black beech, now functionally extinct, in the Aokautere area. Black beech was estimated to cover around 526 ha, based on the distribution of remaining stumps at an altitude from 90–275 m. The forest once provisioned Rangitāne with a plentiful supply of tui, kererū, kākāpō, kākā, and kiwi, and among the streams fish and eels. Karaka groves brought the birds in close for snaring and were an important supply of starchy food for the leaner winter season.

The CIA identified:

- As tangata whenua, **Rangitāne have** primacy, including the authority to manage the area and its natural resources according to their customary and cultural practices, including their tikanga and kaitiakitanga.
- The area was not settled by any other iwi group.
- The cultural landscape has an elevated risk of accidental finds.
- Construction must **be managed according to Rangitāne tikanga**. For example, pre-construction karakia and other protocols throughout works.
- The gullies should be protected and revegetated with locally sourced native species, in particular black beech.
- Wai should remain connected, and culvert lengths should be minimised and meet fish passage guidelines.
- Housing density should be increased and a diversity of section sizes provided to ensure housing is more affordable in the Aokautere area for our whanau and community.
- The need to protect water quality and stream health from construction effects and ongoing stormwater management.
- The negative impacts on taonga from weeds, pests and pets, and the need to enhance biodiversity in tandem with development.

## **SO 77-6**

THE SPECIFIC PARTS OF THE PROPOSAL THAT MY  
SUBMISSION RELATES TO ARE

PROTECTION AND ENHANCEMENT OF VALUES WITHIN THE  
AOKAUTERE GULLY SYSTEM

Previous developments have infilled and/or encroached into the Aokautere gully systems. For example, extensive areas of gully system have been lost to the Pacific and Atlantic Drive developments. We think extensive gully edge encroachment is likely across the entire Aokautere area. This practice has **had a high effect on Rangitāne** values, especially our relationship with our traditional sites and travel routes into the Tararua Range, the mauri and natural flow of wai, and probable loss of taonga species and their habitats. These values are protected as a matter of national importance under section 6e of the Resource Management Act, where the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga shall be recognised and provided for.

The Aokautere structure plan and Plan Change G recognise and provide for the cultural landscape. The landscape-led development approach restricts development in the gullies, restores gully vegetation and green corridors, and enables access to the gully systems for recreation so that our community can value these spaces as we do.



## SO 77-7

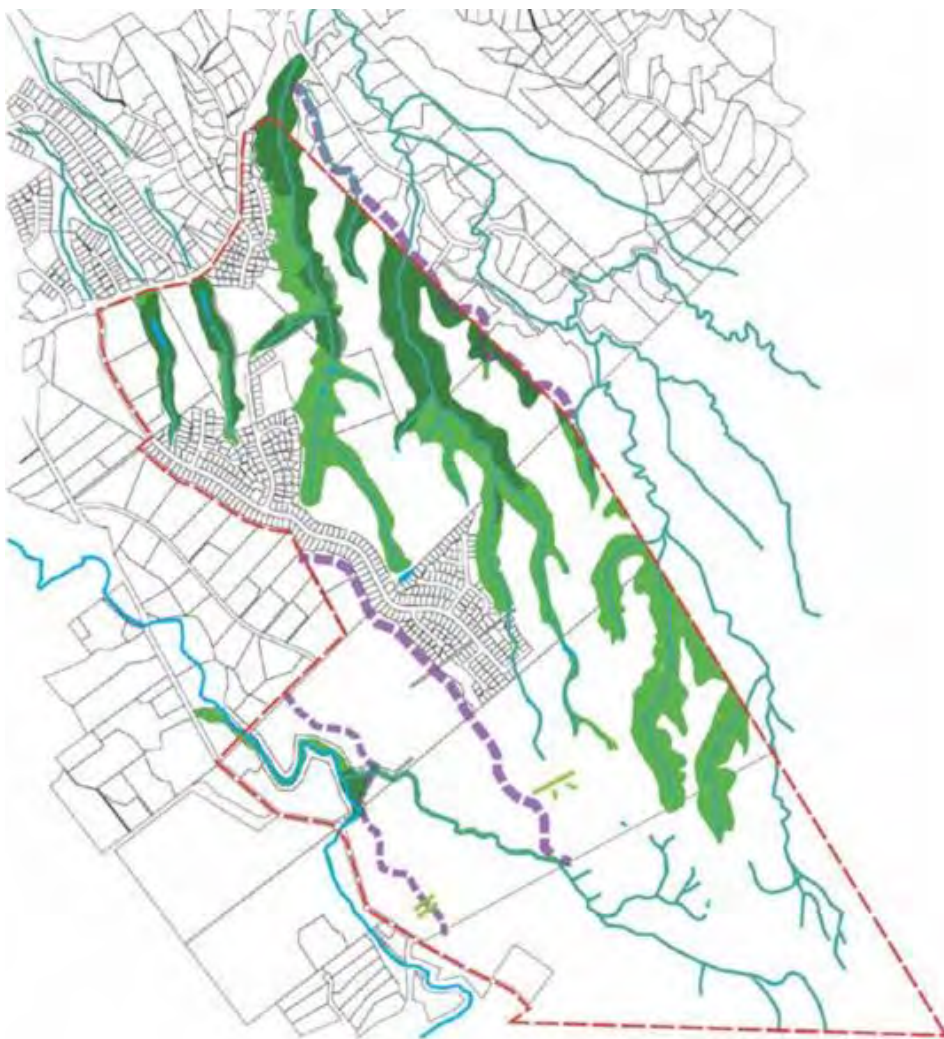


Figure 1: Gullies within Aokautere Plan Change G area.

### RELIEF SOUGHT

- Development in gully systems is avoided in all cases, except where critical infrastructure, such as road connections and the recreation network, is installed.
- Existing indigenous vegetation ecosystems in gully systems are protected.
- Gully systems will be ecologically and culturally restored.
- Future development responds to the escarpment-gully edge landforms, avoiding encroachment into the gully systems using a 5-m buffer strip. This minimises earthworks requirements and maintains public view shafts.
- Roads that follow gully edges are retained and housing that backs onto gully edges is minimised so that the gullies are maintained as public assets.
- The gullies are zoned conservation and amenity areas, as proposed.

## SO 77-8

### TE MANA O TE WAI

The gully systems within Aokautere have a range of ecosystem types, including intermittent, ephemeral and permanent waterways, wetlands and ponds, and terrestrial vegetation. The mauri from the whenua (lands) of Aokautere is collected in these gully ecosystems and feeds **the Manawatū Awa and Turitea Stream**. We have a statutory **acknowledgement over these waterways within the Rangitāne o Manawatū Claims Settlement Act (2016)**. As part of the implementation for the National Policy Statement for Freshwater Management 2020, we have developed a statement to describe what Te Mana o te Wai means to us in our local context. **Our statement applies to the Manawatū Catchment Freshwater Management Unit**, which includes:

- **the Manawatū Awa**
- coastal lakes
- their catchment, tributaries and connections, including groundwater, wetlands and lagoons.

Our statement is as follows:

*"The most significant quality that flows through wai is mauri. The mauri is generated throughout the catchment and is carried through the connected tributaries, groundwater, wetlands and lagoons. It is the most crucial element that binds the physical, traditional and spiritual elements of all things together, generating, nurturing and upholding all life, including that of Rangitāne o Manawatū. The health and well-being of Rangitāne is inseparable from the health and well-being of wai. The Manawatū Awa, its catchment, tributaries and connections, wetlands and lagoons are taonga and valued for the traditional abundance of mahinga kai and natural resources."*

Previous development has increased sedimentation rates, which has had a negative effect on water quality and aquatic ecosystem health. Sedimentation of waterways is a common result of construction but can be avoided if carefully managed. Aokautere has had extensive earthworks and gully infilling. Many of the aquatic ecosystems have been affected by sedimentation because of poor environmental management practices. Stormwater is discharged directly to the environment and can be quite cloudy, indicating significant contamination levels.

## SO 77-9

### RELIEF SOUGHT

- Bioretention devices (rain gardens or wetlands) are incorporated into the road layout and all discharge from impervious surfaces is directed to these devices for filtration and cleansing, as proposed.
- Flooding is mitigated through use of green infrastructure, such as detention ponds.
- The flood mitigation detention ponds or other flood control methods should not be considered as water quality treatment devices, as proposed.
- The streetscape is designed to link stormwater treatment and planting with the retired gully systems. This should be retained as proposed.
- Amenity street planting, wetlands and/or rain gardens use locally sourced native trees that connect the street network with the gully systems.
- Gullies are stabilised with native plantings to minimise in-stream/habitat erosion risks and stormwater is discharged at the bottom of gullies rather than overland flow. This should be retained.

### CONNECTED COMMUNITIES, HOUSING CHOICE AND MIXED DENSITY

Parts of Aokautere have been developed over the past few decades. Typically, developers have provided larger sections and houses to the market at premium prices. This has resulted in parts of the **community, in particular our Māori community, being** excluded from Aokautere due to affordability. Developers have not provided smaller homes, in particular one- or two-bedroom houses, suitable for young or small families, singles and the elderly. Parts of Aokautere are disconnected from the village and amenity areas, which discourages active transport modes. For example, Pacific Drive is long and filled with cul-de-sacs.

### RELIEF SOUGHT

- Plan Change G provides a range of housing choices and densities, and requires developers to provide a range of development outcomes that meet a broad range of community needs. This should be retained.
- Higher density around the village and recreational areas should be retained.
- Plan Change G knits together areas of existing and new developments in a more cohesive spatial plan. Street connectivity, open space connectivity and the recreation network is important and should be retained.

## **SO 77-10**

### ACCIDENTAL DISCOVERIES AND ARCHAEOLOGY

Previous developments have gone ahead without our participation. Being able to implement our tikanga prior to ground-breaking and throughout construction is critical as our role as kaitiaki. Plan Change G specifically introduces accidental discovery protocols, which require developers to engage with us to manage our cultural expectations as part of the subdivision. This provision should be retained.

As described by the **Rangitāne o Manawatū** CIA, the plan change area was not occupied by any other iwi and other iwi having an interest from a cultural perspective is inappropriate. We accept that there are possible downstream effects, but because we intend to improve water quality outcomes, these effects would be beneficial. **Rangitāne o Manawatū is identified as the iwi to work with** regarding accidental discoveries. This should be retained.

## **SO 77-11**

I SEEK THE FOLLOWING RECOMMENDATION OR  
DECISION FROM THE PALMERSTON NORTH CITY  
COUNCIL

*Amend and retain the Plan Change provisions and structure plan based on the reasons and relief sought set out above and in Appendix One.*

I wish to be heard in support of this submission.

If others make a similar submission, I would be prepared to consider presenting a joint case with them at any hearing.

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

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.

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

Privacy s7(2)(a)

Privacy s7(2)(a)



## SO 77-12

### Appendix One: Submission Table

Provision	Support/ Oppose	Position	Relief sought
Section 7: Subdivision			
Objective 3	Support	Existing indigenous vegetation and ecosystems in gully systems should be ecologically and culturally protected, restored and enhanced.	Retain as notified
Policy 3.7	Support	This policy is supported, particularly subclauses (g) (i) and (j).	Retain as notified
Rule 7.15.2.1	Support	The additional matters of discretion ensure adequate consideration of stormwater runoff, effects on the gully network and cultural values.	Retain as notified
Matters of discretion			

## SO 77-13

Rule 7.15.2.1 (f)	Support	Addressing archaeological discoveries in performance standards is supported	Retain as notified
Section 7A Greenfield Residential Areas			
Objective 4	Support	Support ensuring stormwater management does not result in adverse effects on the environment.	Retain as notified
Policy 4.6	Support	Flooding mitigation through green infrastructure, including accommodation of detention ponds and infrastructure is supported.	Retain as notified
Policy 4.9	Oppose in part	Measures to integrate water sensitive design for management of water quality and quantity are supported, however, the flood mitigation detention ponds or other flood control methods should not be considered as water quality treatment devices, as proposed.	Clarify to ensure it is clear that flood mitigation detention ponds or other flood control methods are not water quality treatment devices.
Policies 5.1 – 5.3	Support	Plan Change G provides a range of housing choices and densities, and requires developers to provide a range of development outcomes that meet a broad range of community needs. This should be retained.	Retain as notified

## SO 77-14

Policy 5.4	Support	<p>Plan Change G knits together areas of existing and new developments in a more cohesive spatial plan. Street connectivity, open space connectivity and the recreation network is important and should be retained</p> <p>Higher density around the village and recreational areas should also be retained.</p>	Retain as notified
Objective 6 (new)	Support	Existing indigenous vegetation and ecosystems in gully systems should be ecologically and culturally protected from inappropriate use and development	Retain as notified
Policies 4.6-4.9	Support	Support ensuring stormwater management does not result in adverse effects on the environment	Retain as notified
6.1 – 6.8	Support	Generally support of policies to support implementation of Objective 6 and avoidance of adverse effects on the gully system and natural features.	Retain as notified
6.1 and 6.2	Support	<p><b>Future development responds to the escarpment-gully edge landforms, avoiding encroachment into the gully systems using a 5-m buffer strip. This minimises earthworks requirements and maintains public view shafts.</b></p> <p><b>Roads that follow gully edges are retained and housing that backs onto gully edges is minimised so that the gullies are maintained as public assets.</b></p>	Retain as notified
6.3	Support	Existing indigenous vegetation and ecosystems in gully systems should be ecologically and culturally protected from inappropriate use and development	Retain as notified
6.6	Support	Support vesting of the gully network in council for conservation and amenity.	Retain as notified



## SO 77-15

<p>Rule 7A.5.2.1</p> <p>Matters of Discretion</p>	<p>Support</p>	<p>Support the additional matters of discretion to ensure adequate consideration of effects on the gully network and cultural values</p>	<p>Retain as notified</p>
<p>7A.5.2.2</p> <p>Performance standards</p>	<p>Support</p>	<p><b>The use and incorporation of water sensitive design, including bioretention devices (rain gardens or wetlands) into the road layout and measures to ensure all discharge from impervious surfaces is directed to these devices for filtration and cleansing is supported.</b></p>	<p>Retain as notified</p>
<p>Additional performance standards</p>	<p>Oppose in part</p>	<p>The mauri from the whenua (lands) of Aokautere is collected in gully ecosystems and <b>feeds the Manawatū Awa and Turitea Stream</b>. Locally sourced species are necessary to ensure Mauri is not diminished through new use and development.</p> <p><b>An additional performance standard required under a comprehensive development plan would ensure that locally sourced species are considered during consenting processes.</b></p>	<p>Include an additional performance standard to ensure native planting is locally sourced.</p> <p>And</p> <p>Any alternative or consequential amendments that may be necessary or appropriate.</p>

# SO 78-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Wayne
Last name	Phillips
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 11 Stormwater Management
My submission is:	<p>Stormwater Management is the most critical area of this development which has my support with the following caveat.</p> <p>That the GHD Conclusions and Recommendations, pg37, are followed stringently with particular emphasis on the north eastern boundary adjoining the Moonshine Valley properties below the F1 to F5 plateau multi-unit developments.</p> <p>The proposed 5m setback should be revisited and further detail provided to mitigate peak flow control of stormwater runoff from development of the F1 to F5 plateau's runoff spilling over into the Moonshine Valley properties, which are already suffering runoff erosion and stream scouring throughout the valley. The suggested detention ponds will only retain a finite quantity and not handle the increasing weather events climate experts are predicting. These ponds will also provide a breeding ground for mosquito colonies and create a major hazard to the safety of young children living in the adjacent developments.</p>
I seek the following decision from Palmerston North City Council	<p>Confirmation of the following additions to the Plan;</p> <ol style="list-style-type: none"> <li>1. That a 10m buffer zone at the rear of the F1 to F5 clusters be created and fully planted with native species to absorb any runoff into Moonshine Valley and a further 5m setback to the building line at the rear of those properties.</li> <li>2. That the detention ponds be replaced with a fully piped underground drainage system across the rear of the properties at the boundary feeding directly into the closest of the four Major Discharge locations on the plan.</li> <li>3. That the multi-unit proposal be changed to a single unit status to reduce the hard ground cover (and therefor runoff), on the respective plateau's. This will also reduce people movements, vehicle numbers, parking provision, traffic movement and resident safety on these no exit streets.</li> </ol>
Supporting information	

## SO 78-2

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 79-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Rob
Last name	Campbell
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 in general terms is supportive of the proposed plan change. I wish to make specific recommendations relative to the proposal to extend Abby Road through to Johnstone Drive.
My submission is:	<p>I am not in favour of extending Abby Road through to Johnstone drive. This link will affect the natural aspect of the existing gully over/through which this road will pass.</p> <p>As a general rule I would prefer that we work with the natural features in this area rather than amend them. The potential for damage to the gully environment from motorised traffic at any level is something that I believe we should avoid.</p> <p>The road will potentially benefit a limited number of households, by allowing them to exit onto SH57 via either Pacific Drive or Johnstone Drive. I accept that the proposed changes to the Adderstone Reserve (which as an aside I support) will increase this number to an extent but regardless the maximum number of residents likely to benefit will be fixed and not particularly significant.</p> <p>I would prefer that Abby Road be marginally widened (which I believe is possible) and that the connection with Pacific Drive be amended to include a roundabout, to ensure reasonable traffic flow.</p> <p>I support the proposal to put traffic signals at the Pacific Drive/SH 57 intersection. I would however like to see a roundabout considered at the intersection of Johnstone Drive and SH 57, to assist traffic flow from this major artery.</p>
I seek the following decision from Palmerston North City Council	Amend the proposal by removing the proposed extension of Abby Road to Johnstone Drive.

## SO 79-2

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 80-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Elizabeth
Last name	Fisher
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:	Major concerns are; with storm water/runoff, gully network to amenity zones the maintance of them, multi unit residential housing, transport vibration through the unstable subsoil structure and climate change issues.
My submission is:	<p>I am writing to oppose the Proposed Plan Change G. Aokautere Urban Growth.</p> <p>Excessive Subdivision on the 'farmland' presents significant increase in the amount of stormwater and runoff onto my land. The impermeable footprint from dwellings, roading, individual residents concreting their sections causing more runoff too gather in large amounts, as it cannot be absorbed naturally into the already saturated and greatly reduced natural land footprint, thus causing flooding, erodsion, slips and comprising hillsides and gullies on my land. I have three major gullies on my land which carry large amounts of runoff which is managerable at present. The extra volumes of water from the Multi Unit Resdental Housing footprint will naturally run down gullies and hillsides into my ponds and Tutukiwi ponds quickly filling them flooding onto my road as well as undermining the Tutukiwi stream banks of which part my road sits above. Historically, slopes are prone to slip on this side of the valley. Instabilitly of the hillsides along with the vibrations from traffic and earthquakes through the earth substructure are concerning regarding the Retention Ponds. These can easily rupture releasing tons and tons of water down the gullies onto the land, ponds and stream below. Endangering the aquatic life the valley resedents have nurtured for many years.</p>
I seek the following decision from Palmerston North City Council	My recommendations are; not to build multi unit residential housing along Moonshine Valleys boundary. The subdivision of this farmland be restricted to a minimum of 1 ha. to act as a transtion area from the small sections of Woodgate to the Special Character designated area of Moonshine Valley. That

## SO 80-2

	<p>the dwellings be setback at least 15 meters from the boundary as has been the rule in Turitea Valley which we don't have in this proposal and they (Turitea) don't have the Special Character Designation;. Yet we are both part of the 'Green Belt". These recommendations would help protect our land the indigenous vegetation, robust aquatic habitat, bird and animal populations from light/noise pollution, especially our abundant nocturnal wildlife.</p>
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 81-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Steve
Last name	Rowe
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>The elephant in the room is that there is only one bridge over the Manawatu river.</p> <p>I have lived on the Aokautere side of the river and everything you need to do, you have to come over the Fitzherbert bridge into town. This bridge is already too congested with existing traffic, it will not handle cars from another 1000 sections. If this proposal is allowed to go ahead, residents on the Aokautere side will soon be demanding a second bridge as it will be needed to handle the increase traffic.</p> <p>Who will pay for this bridge? The PNCC can not afford to pay for another bridge at a cost of \$100 million plus. I believe the council has hundreds of millions of dollars to find in the next 10 - 15 years for other infrastructure up grades that it does not know where it is coming from apart from huge rate increases</p> <p>To be clear, PNCC rate payers have no money for a second bridge</p> <p>I will only support this development if the property owner/developer is levied on each section for a bridge contribution. The starting rate should be \$50,000 per section for a bridge levy. 1000 sections would produce \$50,000,000 bridge fund to the future. If this makes this development uneconomic, so be it.</p> <p>I don't believe it good enough for somebody to land bank farm land, convince council to change the zoning, and walk away with \$50 million tax free, and then leave the mess behind for the rate payers to fund.</p> <p>In the current form, I do not support this proposal.</p>
I seek the following decision from Palmerston North City Council	Only allow this proposal to go ahead if a substantial dedicated bridge levy of \$50,000 per section is applied to any new section on the Aokautere side. This not only includes this proposed rezoning, but any other subdivision on the eastern side of the Manawatu river.



## SO 81-2

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 82

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Craig
Last name	Hindle
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:	Firstly the map and information is not clear. So therefore please take it that we have specific provisions over all of the proposals.
My submission is:	Opposed. The proposed development area from what we can work out is going to increase noise levels both short and long term. There will be an increase in vehicles and congestion as an infrastructure plan is not supplied. We moved into the area because of the reserve and the knowledge that because it is a reserve it would not be developed. The development of this area will have a detrimental affect on the nature of the reserve and surrounding areas. The definition of a reserve is a tract of land managed so as to preserve its flora, fauna, and physical features, This is Palmerston Norths City Council custodial responsibility which it will fail to carry out if it was to follow both of the proposals put forward. This means in truth that Palmerston North City Council would therefore fail all of the residents within Palmerston North.
I seek the following decision from Palmerston North City Council	Withdrawal of the proposed plans and continued protection of the areas within the proposals.
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 83-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Ben
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:	A, B, C, D, E, F, G, H, I, J, K, M, N, O, P, Q, G1.
My submission is:	<p>Support A, B, C, D, E, F, G, H, I, J, K, M, O, P and Q. It would be more efficient to have the added connectivity throughout the neighbourhood, and to have a neighbourhood centre at B. Multi-unit housing will be important for Palmerston North into the future to more efficiently use land space, and as a cheaper more easily maintained option for small families or singles/couples. The junction upgrades are needed at M, N, O for safety and efficiency, and a junction upgrade is also needed at the intersection between Old West Road and Summerhill Drive, and the intersection between SH57 and Johnstone Drive. It is great to see the proposed Pedestrian Crossing at P, and the new shared pathway at 3, as currently it is very dangerous crossing the road by pedestrians and young cyclists, as there is a high speed limit and blind S bends in the road. I propose the pedestrian crossing at P be an underpass or over pass for increased safety, or the underpass/overpass could be done closer to the summerhill shopping centre. The drainpipe that has been laid under the proposed road at the cross gully link appears to be too narrow, as during high rain fall it appears water over flows the road, so it is proposed a larger diameter drain pipe is laid. I support better management of stormwater in the Aokautere Growth Area, as to date developers have provided substandard stormwater systems. I support better management of earthwork effects, as given the nature of steep terrain in the reserves there is a risk of erosion. I support the inclusion of walkways in the reserves in the community, however ask that a walkway is not placed in G1 that is too close (i.e. within 5 metres of the boundary) to properties along Johnstone Drive. We have a</p>

## SO 83-2

	<p>spectacular Eastward view from our property at 88 Johnstone Drive, thus have chosen not to fence along that boundary or plant high plants, and it would be disappointing and a bit of an invasion of privacy for a walkway to be placed along the boundary of our section. As an alternative, people could walk along Johnstone Drive footpaths, and the footpath that will go along the road down the cross gully link. It would be great to have a two way cycle path that goes to Cliff Road from either Edenmore Terrace, Vaucluse Heights, Cashmere Drive or Ruapehu Drive, to provide a safer and more pleasant access to Fitzherbert Bridge by bike. Support public bus connections from Aokutere to town, so our son can catch the bus to get to PNINS. I support proposed changes to Adderstone Reserve to make space for more residential houses.</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>See above submission.</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 84-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Tabitha
Last name	Prisk
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 transport report
My submission is:	<p>I do not support the proposed provisions unless more consideration is given to the effects on Turitea Road. Turitea Road is already in disrepair. Creating this new growth area with roads which feature footpaths and cycle lanes which will then connect to Turitea Road is a recipe for disaster. Turitea Road is in poor condition; it is narrow at best and has no cycle lanes or footpaths. It is short- sighted and naive to think that the residents in the Aokautere Growth area will not utilise the foot paths and cycle lanes on their road which will connect to Turitea Road and thus they will continue along Turitea Road on the non-existent foot paths and cycle lanes there. This will cause far too much congestion on Turitea Road. Turitea Road needs to be upgraded and widened. Additionally the two one lane bridges along Turitea Road would also need to be upgraded and widened to accommodate the additional traffic—vehicle, bicycle and pedestrian. The Transport Assessment stated only that “further review of the safety of the intersections to accomodate additional traffic on the Valley Views and Turitea Road approaches is recommended.” This comment does not come close to addressing the demands that will be placed on Turitea Road with the increased traffic and congestion.</p>
I seek the following decision from Palmerston North City Council	I seek the Palmerston North City Council to put this plan on hold until Turitea Road is upgraded so that the enormous amount of traffic that will be utilising the road can do so safely.

## SO 84-2

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 85-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Gaylene
Last name	Tiffen
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:	Stormwater going into our gully at moonshine valley AO1 and the multi-unit development
My submission is:	I strongly oppose this subdivision, There technical report from GhD has not included any of the work they did on our property showing the destruction that has happened. This is continually getting worse.
I seek the following decision from Palmerston North City Council	STOP the subdivision now, and fix the damage that has occurred already. I invite the council and any other interested parties to 14 Moonshine Valley to see the damage that has occurred,divets that are now metres deep and wide, fences buried, trees falling, slips, pasture land that is now full of rubbish weed and general rubbish

# SO 85-2

[IMG\\_2934.JPG](#)



Supporting  
information

[IMG\\_2933.JPG](#)



SO 85-3



[IMG\\_2953.JPG](#)

SO 85-4



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SO 85-5



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# SO 85-6



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SO 85-7



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SO 85-8



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# SO 85-9



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 86-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Jayne
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:	Proposed Plan Change G: Aokautere urban growth
My submission is:	<p>I do not want Valley Views to join up with the subdivision that householders will use to exit the subdivision, boy racers will turn into a racetrack and will provide criminals with multiple getaway options. It is a small country road that under this plan will be turned into a ring road for this subdivision. We are a rural community with stock, horses, small children on bikes, dogs, dog walkers, etc and this plan will alter the whole fabric of the road and cause a significant deterioration in the rural nature of Valley Views.</p> <p>This subdivision will introduce a significant increase in traffic on the eastern side of the Manawatu River which will increase traffic on Summerhill Drive and the Fitzherbert Bridge and cause congestion, difficulty exiting Summerhill subdivision, getting off SH57 on to Aokautere Drive, etc plus problems for cyclists and pedestrians attempting to access the Summerhill shopping centre from Pacific Drive area.</p> <p>There is a need to put in place a northern Manawatu River road bridge crossing to move traffic into/through the city away from the Fitzherbert Bridge and to provide access to the city to residents in Aokautere. This will also provide better access to the hospital, airport, rail hub, north bound roads and will remove traffic from the city centre area. It would also link up with the river bike/walking trail and provide smaller loops for residents to use. This option will also provide redundancy of routes for civil defence and civil emergency and quicker access.</p>
I seek the following decision from Palmerston North City Council	<p>Do not join Valley Views to the subdivision and retain the rural residential nature of the area.</p> <p>Put in place a northern road bridge crossing the Manawatu River to move traffic and provide better access to areas of the city away from Summerhill and the Fitzherbert Bridge.</p>
Supporting information	
Hearing	



## SO 86-2

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 87-1

## 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:	
My submission is:	I support the proposal and the specific provisions in principle, subject to certain amendments as stated in the decision that I seek from the Council
I seek the following decision from Palmerston North City Council	<p>The road infrastructure upgrades need to be completed first before any development consents are given. If development progresses without these road infrastructure upgrades, there is a greater risk of accidents and compromise of road safety. Even currently, entry and exit from Pacific Drive onto Aokautere Drive during office hours is stressful and risky as the speed limit is 70 Kmph.</p> <p>My comments on the road upgrades are as follows</p> <ol style="list-style-type: none"> <li>1) Junction of Pacific Drive and Aokautere Drive should be a roundabout and not a signal. A traffic signal will lead to greater traffic hold ups as it is a three way intersection and not a four way intersection, so the sequencing of lights will favour traffic along /aokautere Drive/SH57. A roundabout should suffice from a safety perspective and will assist smoother flow of traffic</li> <li>2) The current speed limit on Summehill Drive is 60 Kmph until the intersection with SH57, after which it is 70 Kmph. The speed limit should be reduced to 50 Kmph along Summerhill Drive, Aokautere Drive /SH57 until the intersection with Johnstone Drive.</li> <li>2) Entry onto Aokautere Drive /SH57 from Silkwood Place and Cashmere Drive should be via a STOP sign</li> <li>3) There needs to be a roundabout and not a signal at the intesection of SH57 and Johnstone Drive for the reasons stated in (1) above</li> <li>4) There is no requirement for a roundabout at the intersection of Johnstone Drive and Pacific Drive. Most residents of Johnstone Drive exit through SH57 and not through Pacific Drive onto SH57 during office hours. A STOP sign at the intersection of Johnstone Drive &amp; Pacific Drive will be sufficient</li> <li>5) The current cul-de-sacs need to be preserved as residents</li> </ol>

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	have built/purchased property based on these roads being cul-de-sacs. 6) All proposed residential construction in the areas shown in the map, particularly to the south, must be restricted to single level to maintain the aesthetic value of the neighbourhood.
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 88

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Mary-Ann
Last name	Bailey
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 Aokautere urban growth plan; Harriet Fraser Traffic Engineering & Transportation Planning, pages 4, 17 and 29
My submission is:	As a resident of Pineland Drive and a user of Turitea Road daily I am concerned about the increase in traffic on the Turitea Road. There is no real guarantee that Turitea Road will not be a competing access road if for people it becomes a quicker or easier option. This road is quite narrow and has a lot of cyclists on it already - more may come especially if it proves a short route to where they want to go. Often I find the narrowness of the road, on coming traffic, pedestrians, horses and cyclists a very real concern to the safety of all. There is a 'shared' sign but all the sharing in the world does not take into consideration people wanting to be a places on time.
I seek the following decision from Palmerston North City Council	The single lane bridges on the Turitea road to become double lane and Turitea, from Old West Road to Nga Here Park Road to be widened enough to ensure the safety of cyclist and pedestrians and vehicular traffic able to pass them with the confidence not to cause them harm and not to have to slow down more than and few kilometers below the 80 km speed limit.
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 89-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Joy
Last name	Vanderpoel
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:	Summary of Technical Reports: Transport Assessment
My submission is:	Amend the recommendations as they don't go far enough to mitigate the effects of increased traffic volume.
I seek the following decision from Palmerston North City Council	<p>1. "improvements should be made to facilitate safe right turns from SH57 Old West Road into SH57 Aokautere Drive, which could be achieved with a wider central median and longer merge lane".</p> <p>This is totally inadequate for this busy intersection which often sees vehicles backed up down Old West Road, particularly when a truck and trailer is trying to turn Right onto Aokautere Drive. With the increased traffic trying to turn Right from Summerhill Drive into Old West Road, accessing the large developments down Tiritea Rd and Valley Views, the right turn out of Old West Road will become even more problematic. An extended merge lane won't solve this. This intersection needs traffic lights.</p> <p>2. "It is recommended that Ruapehu Drive (northern end) operates with left in/ left out with an opportunity for U-turns created further to the south ..... One possibility would be to introduce a roundabout at the Williams Terrace intersection with Summerhill Drive".</p> <p>This doesn't help the right turn out of Mountain View Road! Given that the next paragraph notes that "an option for safely accommodating cyclists travelling between the northern end of Ruapehu Drive and the City should be developed", surely traffic lights at the northern Ruapehu Drive/ Summerhill Drive intersection would be the obvious solution for both vehicles and cyclists turning onto Summerhill Drive from both Mountain View Rd and Ruapehu Dr. Consideration could also be given to the roundabout at Williams Tce, but this would need to be additional to the traffic control option at Ruapehu</p>

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	<p>Drive.</p> <p>3. There is no mention of traffic control for vehicles turning right from the southern end of Ruapehu Dr. While there is currently a merging lane this is already woefully inadequate at peak times. If traffic lights are provided at the SH57 Aokautere Dr/ Pacific Dr intersection, further signalling should be included at Ruapehu Dr and synchronised with the Pacific Dr traffic lights.</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 90-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Colin
Last name	Perrin
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>1. Visual Impact....multi unit dwellings on v. small sections right along the top of our hills. Have to be at least double storey to get them in.</p> <p>2. Storm water from the impermeable footprints of these dwellings and roads. Also any concreting on the sections which Council say will be restricted but they do not police it. Erosion and silt affecting our stream is awful now. Far far worse if this subdivision allowed.</p> <p>A property in the valley is currently affected by the current Johnstone Drive subdivision,</p>
My submission is:	<p>Mitigation.</p> <p>A. Council have a 5m setback from the Valley boundary which they reckon will be sufficient to protect the slopes...NO. That, if anything, will aggravate the instability of the slopes and cause more slips. Already some slips and lots of historical ones all along that side. 5m is just too small.</p> <p>B. Council are putting in Retention ponds to collect all the storm water off the developments. Sited at intervals along the top of the slopes. These are to enable constant and gentle release of water. By midwinter they will be full and any rain event after that will cause flooding straight down the slopes. More instability and erosion. In addition will only take a good earthquake shake to damage these ponds, if not destroy them, and down comes a large volume of water all in one go.</p> <p>Damage to aquatic life from the silt...Endangered Giant kokopu and endangered long fin eels will be badly affected. Also have short fin eels, koura, kakahi, shrimps, bullies.</p> <p>The stream through my property is currently good quality water with aquatic life visible.</p> <p>We have noticed more water in roadside drains and streams over the last couple of years and with global warming there will be more impact.</p>
I seek the following decision from Palmerston North City Council	<p>Request:</p> <p>A. Setback of dwellings at least 15m from boundary as has</p>

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	<p>been ruled for buildings overlooking Turitea Valley. Moonshine Valley has a Special Character designation. Turitea Valley does not and yet they have this rule and we do not. Will help a lot with Visual Impact.</p> <p>B. Subdivision of this farmland be restricted to a minimum of 1ha to act as a transition area from the small sections of Woodgate to the Special Character area of Moonshine Valley.</p> <p>Setback and minimum 1 ha sections will help with storm water and Visual Impact.</p> <p>C. With the proposed new housing and the already congested intersections, i.e. Summerhill and Old West road, please consider mitigation i.e. roundabout or similar</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 91-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	David
Last name	Prisk
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 of the Transport Assessment and Landscape and Visual Assessment.
My submission is:	<p>Thank you for providing the opportunity to comment on the Aokautere Growth Area plan.</p> <p>While I do not oppose growth in Turitea and Aokautere, what is currently proposed is problematic.</p> <p>It seems as though the proposal to build approximately 1000 more houses in Aokautere has been done without properly considering the infrastructure necessary to accomodate the people expected to live in those houses.</p> <p>Based on current use of the wholly inadequate public transport system in Palmerston North, it seems unlikely that residents of the proposed new area will use buses to get to and from the city with any greater frequency than they do now. This will be a commuter neighbourhood, and a massive increase in car traffic will be inevitable. With that said, there will need to be proper cycle lanes on Summerhill Drive and Aokautere Drive and better footpaths leading into the city. The Fitzherbert Bridge will need to be widened, or a second bridge, at least of equal size and able to accomodate foot and cycle traffic, will need to be built further up the Manawatu River. This does not appear to be part of the current plan.</p> <p>There will need to be multiple traffic lights along Summerhill Drive and Aokautere Drive, or there will need to be massive roundabouts constructed.</p> <p>Turitea Road and Ngahere Park Road will need to be widened and improved, with proper cycle and walking lanes and proper two-lane bridges built. These roads cannot handle the traffic they have now and to imagine that there will be no spillover from the newly proposed neighbourhoods is at best wishful thinking. Cycling, tramping, and horseback riding</p>

## SO 91-2

	<p>make Turitea and Ngahere Park Roads extremely dangerous now, both for those driving cars and those using the roads for recreation; with up to 3000 more people potentially accessing these roads through a connector, it is virtually certain that someone will be seriously injured or killed if no improvements are made. These roads are in poor repair and narrow, and the bridges are ill-suited for traffic of any kind. This is not to criticise the idea of a road connecting these rural roads to new neighbourhoods, but to insist that the rural roads receive the care and attention necessary to make them safe. Anything less is disrespectful of those who already rely on these roads for daily travel, and all those who might potentially use these roads as an auxiliary route into the city or for recreation.</p> <p>It is also concerning that no mention is made of improving basic services to houses already on Turitea and Ngahere Park Roads (including Kereru, Oram, and Guyland Drives). Despite being forced to view sprawling urban neighbourhoods instead of rolling hills and green paddocks, there seems to be no plan to provide compensation to these areas with city water, sewer, or fibre broadband. It seems we are being at least doubly punished for where we've chosen to live.</p>
I seek the following decision from Palmerston North City Council	I ask that this plan not move forward until specific, concrete plans and budgeting are provided for improvements to Turitea and Ngahere Park Roads
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 92-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Tracey
Last name	Yung
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 G
My submission is:	<p>I oppose the proposed plan G</p> <p>I believe the special character status of moonshine valley will be irreversibly damaged by heavy development on the land above and directly beyond the valley. I am pasting an excerpt from your own documents :</p> <p>DP 7.3.6 explanation p.19:          “The Moonshine Valley Rural Residential Area has been identified as a special character area. Moonshine Valley is a distinctive, relatively incised and contained valley landscape, comprising a broad valley floor, sloping sides with contour level changes and reserve corridors. It has important natural character and landscape values and significant ecology and biodiversity. These values and characteristics of Moonshine Valley are documented in the report Moonshine Valley Visual Landscape Assessment (Palmerston North City Council 2011) and the Palmerston North Landscape Inventory (Palmerston North City Council 2011). The essential contributing factors to the area’s special character are its relatively uniform subdivisional arrangement (multiple parcels of a similar 1.5 ha size) and its natural streetscape character, which creates a unique and distinct sense of place. The low-density development pattern and the natural character of Moonshine Valley Road environs especially, contributes to the high visual amenity of Moonshine Valley, overall. To ensure that these important and defining characteristics are retained and subsequent development does not create adverse effects on the special character and identity of Moonshine Valley, subdivision within the Moonshine Valley Rural Residential Area, not complying with the specified minimum lot area, will be consented as a Non-Complying Activity.”</p>

## SO 92-2

	<p>I believe there are many many problems with the proposed plan. Here are a few that instantly spring to mind.</p> <p>Stormwater run off. Our section is already experiencing more flow down our hill, this water is already affecting our section. This is going to multiply ten fold once intensive development kicks in. I have read your reports and don't believe you have the solutions in place to rectify this. This is a big concern. What happens if the development does go ahead and the water collection points get full. I believe this will over flow into our sections and into the reserves we have on either side of us,</p> <p>I read in your reports that it won't only be straight flooding and erosion destroying our special character reserves. This development WILL also affect our special character waters here in Moonshine Valley via damage from silt to our aquatic life in Moonshine Valley stream...Endangered Giant kokapu and endangered long fin eels will be severely compromised. We also host short fin eels, koura, kakahi, shrimps, bullies.</p> <p>We are part of NZ's hard worked for green corridor, I am not satisfied by what I've read that this is going to remain and flourish. That's not ok. Damage from silt to our aquatic life in Moonshine Valley stream...Endangered Giant kokapu and endangered long fin eels will be severely compromised. Also have short fin eels, koura, kakahi, shrimps, bullies.</p> <p>I am hugely concerned about how on earth our road system up here will cope with all the additional traffic. Our roads are substandard, there is no room to expand them to add extra lanes, and the bottle neck at the bottom of summer hill drive is going to be crazy.</p> <p>I do not like the idea of removing some of the Adderstone Reserve and building homes there. This is a dangerous precedent. A reserve is a reserve and I dont agree with altering it.</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>I would like to see a set back of dwellings at least 15m from boundary. This has already been ruled for buildings overlooking Turitea Valley. As a Special Character designation here in Moonshine Vallet, we should at least have the same. Turitea Valley is not a special character area and yet they have this rule. We should have it also.</p> <p>I would like to see a transition in section size as you move further from the centre of the new build area (Woodgate etc) out to the Special Character area of Moonshine Valley. I'd like to see subdivision of this farmland be restricted to a minimum of 1ha per lot.</p>

## SO 92-3

	<p>I'd also like for current interested parties in Moonshine Valley to be offered by the council the right to purchase the land directly beside/behind them. We, for one, would be very interested in purchasing the land beside and behind us. I am sure others would be the same.</p> <p>I would like additional work done on water management. I want a guarantee that properties and reserves will NOT be adversely affected by the development.</p> <p>I would like a bridge from Staces road across to the bottom of kelvin grove. It has been discussed many times in the past. I believe this will hugely help traffic congestion.</p> <p>I ask for no development of Adderstone Reserve.</p> <p>(Actually I'd like to ask council why on earth develop up here to the density proposed when there is so much flat land available out cloverlea way or between P.Nth and Ashhurst? Why up on a hill with a single road in or out?? I don't understand at all.</p>
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 93-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	jeff
Last name	watson
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:- and specifically:- Aokautere Residential Plan Change - Parks + Reserves Servicing Assessment 2021 Section 4 - Neighbourhood Reserve - Adderstone Reserve - proposed partial disposal.
My submission is:	<p>I generally support Plan Change G with the exception of the proposed changes to the Adderstone Reserve which I do not support.</p> <p>The loss of any reserve space within Palmerston North should only occur where there is a wider community good associated with the loss. In the case of Adderstone Reserve there is negligible community good to be gained via the proposed changes.</p> <p>Once this area of reserve is lost it will never be recovered and I strongly believe that Council has an important role to play in ensuring that the city structure is optimised for future as well as current generations. The optimisation of city space must include the creation and maintenance of as much green space as possible for formal (sporting) activities as well as casual recreational activities. The loss of a substantial part of Adderstone Reserve to enable the creation of a handful of Residential Lots appears to be a very poor trade-off.</p> <p>With a national desire to allow in-fill and high density housing any reserve area (large or small) becomes increasingly important as areas in which children (and adults) can enjoy the outdoors. Given the nature of most children's activities, flat areas are more desirable than hills and valleys. The proposed change to Adderstone Reserve removes much of the flat areas available for use within the Reserve, thus significantly reducing its suitability for a range of casual</p>

## SO 93-2

	recreational uses.  In summary, while I generally support Plan Change G, I only do so if the proposed changes to Adderstone Reserve are removed.
I seek the following decision from Palmerston North City Council	The changes that I seek in relation to Plan Change G are: 1. The removal of the proposed changes to Adderstone Reserve 2. The adoption of all other proposed changes associated with this plan change.
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 94

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Gert
Last name	Starker
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:	Junction upgrade Summerhill drive and Ruapehu drive and Mountain View road junction.
My submission is:	Support the plans, but this will significantly increase the traffic coming down Summerhill drive to Palmerston North central, especially at peak traffic flow times. It already is a busy road at peak times.
I seek the following decision from Palmerston North City Council	I request that this junction (Summerhill drive, Ruapehu drive, Mountain View Rd) be upgraded to a roundabout.
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 95-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Anna
Last name	Berka
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 impact on the area, cycling provisions from proposed development to town and Massey, density of proposed housing.
My submission is:	<p>Many thanks for your substantial efforts in putting together the information regarding this development.</p> <p>This urban plan sits at odds with New Zealand country's climate commitments, which require radical shift towards active transport facilitated by compact and intelligent urban design, in which key work and service destinations are no more than 15 minutes walking or cycling from the home. Given that low emission urban planning regulations are on our doorstep, and likely to necessarily be part and parcel of urban design throughout the country within the next 5 years or so - and that this as you know comes far too late as it is - and given that PNCC have at least two staff members whose entire job description to ensure we get this right - I find this very disappointing. This housing development is an opportunity to 'do it right' and put Palmy on the map with regards to best practice. This housing development will be with us indefinitely, and any future structural redesign or retrofitting will come with a hefty price tag.</p> <p>Along this line of thought, the plan:</p> <ul style="list-style-type: none"> <li>- Does not prioritise land use efficiency through compact urban design : the majority of the development is medium density suburban standalone houses. This is at odds with your own projections for increased demand in single and double occupant housing in Palmerston North.</li> <li>- Is not centred around a integrated plan for non-motorized transport that considers how public transportation, walking, biking and public transit will work together to enable residents to easily access key school, work and service destinations.</li> <li>- Makes virtually no attempt to reduce private vehicle use (though urban layout, efficient public transport networks, and transport demand management).</li> </ul>

## SO 95-2

	<p>- Fails to acknowledge existing cycling behaviour from the Aokautere area to Massey and into town. Most cyclists commuting to school or work will take either Cashmere Drive - Cliff Road, or they may take Ruapehu Drive and join Summerhill Drive on its descent to the bridge, because it is far safer and shorter than cycling along Aokautere/Summerhill Drive. It is important to note that Aokautere Dr/Summerhill Drive is in its current form absolutely not considered a safe travel route for cyclists, because of proximity of vehicles, speeding, glass and car parts on the roadside, and will remain so unless you build in a cycle path that is physically separated from vehicles using the main road. If your intention is increase cycling uptake, and make it accessible to parents with children, which the PNCC climate strategy would necessitate - it may make more sense to make these interior routes dedicated cycling routes, removing the blockade at the end of the Cliff Road which currently forces cyclists to dismount and walk through it. The proposal to convert Ruapehu/Summerhill Drive intersection into a left in left out only intersection will only add to cyclists frustration. It is currently very difficult to get on to Summerhill Drive during peak traffic.</p>
<p>I seek the following decision from Palmerston North City Council</p>	<p>- Clarification as to how this development will affect the PN Climate Strategy and aligns with national emission reduction plan.          - Whether you will reallocate the dedicated cycling route from Aokautere/Summerhill Drive to interior routes via Ruapehu Drive and Cashmere/Cliff Road and amend your plans to improve these cycleways accordingly.</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>Yes</p>

# SO 96-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Anne
Last name	Ridler
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 5, page 26: 5.2 Cashmere Drive/Aokautere Drive
My submission is:	<p>This section appears to state that there is no requirement to build a right-turning bay from SH57 into Cashmere Drive, or have a merging lane for those turning right out of Cashmere Dr. I disagree with this assessment and submit that a right-turning bay should be built from Aokautere Rd into Cashmere Dr for 3 reasons:</p> <ol style="list-style-type: none"> <li>1. Turning right into Cashmere Dr is currently dangerous. When heading west on Aokautere Rd it is common to be in a string of traffic as everyone gets stuck behind a slow vehicle going up the hill which then speeds up on the flat. This means there is a good chance you will have a closely-following vehicle (or not uncommonly, be getting actively tail-gated) by the time you get near the turn into Cashmere Dr. You then come around a semi-blind corner just before the turn so have limited time to evaluate oncoming traffic and hence make a decision about whether you can make the turn quickly, sit in the middle of the busy road (often with oncoming trucks) or pull left and wait until it is clear in both directions. If the latter option is chosen, because of the semi-blind corner, pulling back onto the road is not without hazards. Despite careful use of the right indicator and brake lights I have nearly been rear-ended a couple of times while attempting this manoeuvre. It seems ludicrous that a tiny cul-de-sac like Silkwood Pl has a right-turning bay when Cashmere Dr does not. Aokautere Rd is only going to get busier, which will exacerbate the issue.</li> <li>2. The Council aim is to encourage more commuting via bicycle. By far the most pleasant and safest bike route to the city or to Massey is to bike down Cashmere Drive, turn right onto Vaocluse and then link onto Cliff Rd (NB Summerhill Dr for cyclists is hazardous, smelly, noisy and covered in broken glass; a proper cycle lane as proposed will still not fully address these issues). A right-turning bay would make it safer for cyclists coming into the city along Aokautere Rd to turn right onto Cashmere Drive. An underpass would be even</li> </ol>

## SO 96-2

	<p>better for this purpose but that might be a bit too optimistic :-)</p> <p>3. The traffic assessment to provide evidence for the decision was apparently done 18 months ago; Cashmere Dr has become busier since then and will become more so due to the development of Vaucluse Dr</p>
I seek the following decision from Palmerston North City Council	<p>I would like PNCC to ensure a right-turning bay is built from Aokautere Drive into Cashmere Drive. Ideally, a merge lane for those turning right from Cashmere Dr onto Aokautere Dr would also be incorporated.</p> <p>Thank you.</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 97-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	[REDACTED]
Last name	[REDACTED]
Organisation	Manawatū Branch of Forest & Bird
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:	1) Additional stormwater flow into the area, and particular to moonshine valley, due to the large housing development area. Strong and clear provisions are required to prevent this occurring. 2) The maintenance of existing ecosystems. 3) General issues (lifestyle blocks and cats) Please refer to attachment
My submission is:	Please see attachment for full details
I seek the following decision from Palmerston North City Council	Manawatū Branch of Forest & Bird supports the proposed plan change, provided the environmental conditions for the development can be strengthened.
Supporting information	<a href="#">Aokautere development submission FB).pdf</a>
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



**Forest & Bird**

TE REO O TE TAIAO | *Giving Nature a Voice*

Royal Forest and Bird Protection Society of New Zealand Inc.

**Manawatū Branch**

Privacy s7(2)(a)

Privacy s7(2)(a)

Privacy s7(2)(a)

This submission is prepared by the Manawatū Branch of Forest & Bird.

We appreciate there is a need to build more housing in Palmerston North and we are grateful for the extensive work that has been done by PNCC and by Rangitāne including efforts to ensure positive environmental outcomes. Our concerns for the environment are heightened in the light of the unpredictable nature and the increasing severity of climate change and the dire plight of many of our species under threat. We would hope that with some suggested changes that the development will be successful and serve us for many years into the future.

This submission primarily covers:

- 1) Additional stormwater flow into the area, and particular to moonshine valley, due to the large housing development area. Strong and clear provisions are required to prevent this occurring.
- 2) The maintenance of existing ecosystems.
- 3) General issues (lifestyle blocks and cats)

We wish to see the following considerations given to the development.

## 1. Management of water flows.

- While consideration has been given to managing water flows, we support the recommendation that the developer (ref GHD stormwater management strategy pg 37) is required to develop a plan demonstrating compliance with the stormwater plan design criteria and concepts. We also feel that it is important to use the most up to date information and future proof this plan as far as possible. This is to best meet future needs that might occur with the unpredictable nature and increased severity of climate change events.
- We have significant concerns about the volume of sediment that will be produced during site preparation and ask for more to be done to prevent this (e.g., working in very small sections at any one time to minimise exposed soil, and constructing more wetlands and stormwater retention systems (and other strategies) **well before** development starts so stormwater and sediment can be dealt with before any increases occur,
- We would expect **hydraulic neutrality**, therefore we ask that water sensitive design and nature-based solutions be used to address potential issues if the plan change is

## SO 97-3

approved. These should be requirements of the plan change and should exist as conditions on the resource consent. That would mean:

- houses must have stormwater retention tanks, and that water should be accessible for garden-watering/emergency use (not just as surge tanks)
  - Impermeable surfaces should be minimised (and limits put on this at a % per site and % across suburb level)
  - Rain gardens should be required on berms and in a proportion of gardens (rather than just grass). These should use native plant species.
  - porous paving should be used in driveways and wherever else possible
  - Other mechanisms such as infiltration trenches, sand filters, settlement traps, tanks, ponds, and green roofs should be considered
  - wetlands should be constructed in addition to those that are already present (if any are present)
  - the width of river corridors should be maintained (i.e., rivers should not be 'stabilised' or channelised), and buffers increased. Development in or around the floodplain/zone of any streams should be prohibited.
  - all stormwater drains should be clearly labelled "flows to river and sea" (or something similar). Rubbish capture devices and filters should also be used where possible.
  - car washing on the street/driveways (or anywhere water may drain to stormwater) should be prohibited in this suburb.
- Additional monitoring and requirements should be used to proactively improve water quality and river habitat, rather than monitoring and waiting for degradation to occur.
  - We note there is an assessment of the stormwater plan against the Horizons One-Plan and the draft plan change, but there is no assessment against the NPSFM (2020) and the idea of Te Mana o te Wai, and no assessment against the PNCC stormwater bylaw, which was recently updated (last year) to recognise Te Mana o Te Wai. This assessment needs to be done.
  - There is a suggestion that "stream stabilisation within the gullies" (ref GHD stormwater management strategy pg 34) might be needed. We are opposed to this concept as rivers and streams need room to move and to develop naturally and should be given space to do so (as per our comments above about river corridors and restricting development on floodplains). Hence the development needs to stay well away from them and give them a large buffer (this also means they can flood safely). It's much harder to retreat from a stream if you've developed too close to it. If streams might need stabilising to deal with more water coming from stormwater, then the stormwater retention proposals are insufficient and more needs to be done, i.e., more planning is needed to produce less runoff. The plan change should have designated river corridors that provide plenty of space for waterways and limit development in these areas. If council is lacking expertise in this area, we recommend consulting with local experts at Massey University's Innovative River Solutions Centre.

## 2. Maintenance of existing ecosystems

Bush areas should be recognised as SNAs and protected with covenants too (if they aren't already). Proactive restoration and extension of these areas should be included as a condition of the plan change.

## **SO 97-4**

### 3. Other

We request a ban on cat ownership in the suburb. This has been successful in other new developments (such as a development in Hamilton, where such a ban was introduced to protect a local population of Pekapeka bats). This would ensure the valleys of native bush can continue to support native wildlife and are not degraded by the presence of cats roaming in and killing birds (which will happen).

Finally, we note that owning a lifestyle block is a luxury that is inappropriate in a world where pressure on land is becoming greater and productive land is becoming a more scarce. We support higher density development with low physical and environmental footprints and urge the council to reconsider this sprawling and inefficient land use. We would much rather see denser developments with areas of grass restored into wetlands or native bush, for biodiversity and carbon sequestration, as well as for the enjoyment from the community.

Manawatū Branch of Forest & Bird supports the proposed plan change, provided the environmental conditions for the development can be strengthened.



# SO 98-1

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Sara
Last name	Burgess
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:	Cycleways, traffic assessment (appendix 5), visual impact and stormwater management
My submission is:	<p>I oppose the proposed plan as it currently stands.</p> <p>1. There is little detail on proposed cycleways. The current cycle way on Summerhill has not been designed well with cars still being able to park beside the coffee cart which means cyclists have to pull into the middle of the road. How will the cycle way pass safely in front of the old west road intersection? There have been numerous near misses between two cars and between cars and cyclists (both my husband and I have nearly been hit on our bicycles at this intersection) when biking along this road into town and a car is turning right from Old West Road into Summerhill. A wider and longer median line would not address this issue. Traffic lights would be ideal in terms of safety but would this mean traffic jams along summerhill drive with the increased traffic volume going into town? Ruapehu Drive has been proposed as an alternative option for cyclists, if this goes ahead how will cyclists cross Summerhill Drive with the increased traffic volume? At present it is already very difficult to cross. A round-about has been suggested in the proposal but cars often don't see cyclists at roundabouts. A separate cycleway would be needed that doesn't use the same round-about as cars.</p> <p>2. Increased traffic. In appendix 5 it states there will be increased traffic and that this can be mitigated by getting people to use buses and cycles more but there is no detail on how they will get more people to use buses and cycles. The development would add 8000 car trips per day with only one main road into town from Summerhill drive into Fitzherbert Ave this will become one of the busiest with the most traffic in Palmerston North.</p> <p>3. The proposed multi story dwellings on the the skyline will visually impact the special character area of Moonshine Moonshine Valley Road.</p> <p>4. Storm water will increase and will run off and damage the waterways and gullies around Moonshine Valley. Erosion and slips is already evident since development on the hill in</p>

## SO 98-2

	both Tutukiwi reserve and the smaller moonshine valley reserve.
I seek the following decision from Palmerston North City Council	<p>I would prefer no additional housing to go above Moonshine Valley Road. However, at a minimum the proposal should have have dwellings setback at least 15m from the edge of the hill overlooking Moonshine Valley (as already done in Turitea Valley), with a minimum subdivision of 1ha to transition from residential to small lifestyle blocks found in Moonshine Valley.</p> <p>To encourage residents to cycle, cycleways should be completely separate from the road where cars are not able to park. Do not use roundabouts at intersections as cyclists find these dangerous. A traffic light should be placed at the Old West Road / Summerhill intersection.</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 99

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Heather
Last name	Turnbull
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:	Page 3 Partial Reserve Disposal for Housing of Adderstone Reserve which I am against
My submission is:	<p>I oppose the use of the 1.73 hectares of Addderstone Reserve being used for housing.</p> <p>I was mailed information that gave two options, option 1 shows the reserve retained to current extent with housing running along side of it and option 2 shows repurposing of part of the reserve to create even more housing. I support option 1.</p> <p>The reasons for my views are : I have lived in Abby Road for over 20 years and observed a huge increase in the number of people using this reserve for many different activities: eg exercising and training dogs, families playing ball and flying kites etc. they come here because there is enough space to do this and the other areas close by are too small, which shows we still need these larger area's especially with the spreading of urban growth.</p> <p>Also Abby Road is not wide enough to cater for the extra traffic which would be required. If cars are parked on either side of the road only one car can go through.</p>
I seek the following decision from Palmerston North City Council	That Adderstone reserve is retained to its current extent.
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 100

## Proposed Plan Change G: Aokautere urban growth

Your contact details	
First name	Cristopher
Last name	Joven
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	No
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	
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

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

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

PNCC Rec'd 05 SEP 2022



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](http://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](http://pncc.govt.nz/aokautere)

Emailing to:

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

**YOUR CONTACT DETAILS**

First name

Paul

Last name

Hewitt

Postal address

Privacy s7(2)(a)

Email

Privacy s7(2)(a)

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.

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.

*Generally support the proposal  
My submission is attached*

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

*To make changes to the proposed plan change in line with my submission.*



**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

*A Phelan*

Date

*3 Sept 2022*

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

- There are no state schools in the urban area on this side of the river. These need to be provided
- The lifestyle zone in Turitea Valley consumes a lot of land for each residence. Better utilisation of this land would be made of it if it were added to the Urban growth proposal. A lifestyle block could contain 12-15 houses per hectare.
- Better footpaths are needed on main routes from the CBD to this suburb. Summerhill drive urgently needs a footpath on both sides of the road as does Aokautere Drive.
- The proposed shopping centre straddles a primary road. It needs to be repositioned to one side of the road to reduce conflict between pedestrians and traffic
- Some of the roading proposals need a rethink. For example it is unrealistic to consider left turns only at one end of Ruapehu Drive. If implemented it would create a nightmare scenario for shoppers at the existing shopping centre and a large number of residents living in Ruapehu Drive, Cashmere Drive, Kilkenny etc.
- Summerhill Drive and Aokautere Drive are only 2 lane roads. These roads will at some point reach capacity. Aokautere Drive is already a through state highway and will in due course become part of the Urban Ring Road. There needs to be provision made to upgrade these roads to become four lane roads.
- There needs to be provision to provide a bypass for the state highway - Like is being planned at Levin. Once residential development has occurred adding an alternative corridor will become exceedingly difficult.

**SO 101-4**

- I would like to see the provision of sports fields in this development, and associated community facilities.



# SUBMISSION ON PROPOSED PLAN CHANGE G: AOKAUTERE URBAN GROWTH

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991



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- 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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## Submissions close

**4pm, Monday 5 September 2022**

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Palmerston North

### Visiting our website:

[pncc.govt.nz/aokautere](http://pncc.govt.nz/aokautere)

### Emailing to:

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

## YOUR CONTACT DETAILS

First name

ROBERT

Last name

GARDNER

Postal address

Privacy s7(2)(a)

Email

Privacy s7(2)(a)  
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.

NIL SAFETY IMPROVEMENTS FOR AOKAUTERE/CASHMERE JVE  
HARRIET FRASER TRAFFIC ENGINEERING & TRANSPORT PLANNING  
SECTION 5.2 CASHMERE DRIVE/AOKAUTERE DRIVE

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 OPPOSE THE PROVISION THAT THE CASMERE DVE/ AOKAUTERE DVE INTERSECTION IS AND WILL REMAIN SAFE FOR ALL USERS WITHOUT

- 1) PROVISION OF RIGHT TURN BAY IN + OUT OF CASMERE DVE
- 2) COMPLETE STABILISATION OF THE BANK OPPOSITE INTERSECTION
- 3) IMPROVED SIGHT LINES LOOKING LEFT FROM CASMERE DVE
- 4) SECURE LAND OPPOSITE INTERSECTION TO ACHIEVE ABOVE

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

- 1) PROVIDE AN OPTION TO DESIGN + COMPLETE RIGHT TURN BAYS IN + OUT OF CASMERE DRIVE  
 RETAIN AND STABILISE BANK TO PREVENT CONSTANT ONGOING SLIPS PAST 20+ YEARS  
 IMPROVE SIGHT LINES TO LEFT AT EXIT TO CASMERE DRIVE



**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

03-09-2022

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

**SO 103-1**

**PALMERSTON NORTH CITY DISTRICT PLAN**

**FORM 5**

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

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

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

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

**Name of Submitter: Flyers Investment Group Ltd.**

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

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

**Section 10 Residential Zone**

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

**The submitter acknowledges that the submission was received after the closing on submissions, 4pm 5<sup>th</sup> September 2022. A waiver of compliance with the time limit is requested from Council to accept this submission in accordance with Section 37 of the Resource Management Act 1991.**

The specific provisions of Proposed Plan Change G that this submission relates to is Rule 10.7.4.6 and associated proposed assessment criteria (k).

The substance of the submission and the decisions requested are as follows.

**Submission:**

Flyers Investment Group Ltd has recently been through a lengthy hearing process to determine a Private Plan Change for the Whiskey Creek Residential Area.

## **SO 103-2**

The Whiskey Creek Residential Area will be an additional Greenfield Residential Area. The hearing is now closed and the panel is preparing their recommendation. As part of the process there was considerable expert conferencing of planners in relation to the wording of policies and rules for the area. To a very large extent the planners agreed on the plan provisions and this is recorded in various Joint Witness Statements and Joint Reports.

The submitter was therefore very surprised to find at the close of submissions that Proposed Plan Change G includes provisions that directly affect the rules applying to the Whiskey Creek Residential Area and were not revealed to the plan change requestor, submitters or to the Hearing Panel as part of the hearing process.

Mr Michael Duindam was a Council expert witness at that hearing and is also the lead contact for Plan Change G.

The matter relates to the insertion of extensive design related assessment criteria at R 10.7.4.6 (k) that apply to all Greenfield Residential Areas with only the last part specifically cross referencing to transport network requirements for the Aokautere Residential Area.

We understand that the proposed Structure Plan for the Aokautere Residential Area includes an option for a Retirement Village within the area and that has led to these proposed Assessment Criteria.

The submitter considers that these assessment criteria are inappropriate for the Whiskey Creek Residential Area and any criteria added to the Plan by way of PC G should be limited to the Aokautere Residential Area only.

Even if they were to apply, the submitter considers that they have potential to conflict with the design requirements of retirement villages.

The submitter therefore seeks that R10.7.4.6 be deleted or if retained in any form is confined to the Aokautere Residential Area.

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

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

**Signed by** [REDACTED] (on behalf of Flyers Investment Group Ltd):



..... **Date: 9 September 2022**

**Address for service:**

Privacy s7(2)(a)  
[Redacted address]

**Telephone:** Privacy s7(2)(a)

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

9 September 2022

Palmerston North City Council  
Private Bag 11034  
Palmerston North 4410

Attention: Team Leader – Governance and Support

### Form 5 - Submission on Proposed Plan Change G: Aokautere Urban Growth

Name of Submitter: Arvida Group Ltd

- a) The submitters comments below are focused on key matters of concern. The submitter reserves the right to comment further on objectives, policies and rules as the Proposed Plan develops.
- b) The submitter wishes to be heard in support of this submission.
- c) If others make a similar submission, the submitter would be prepared to consider presenting a joint case at any hearing.
- d) The submitter could not gain an advantage in trade competition through this submission.

### Request for waiver of time limits to accept late submission

The submitter acknowledges that the submission was received after the closing on submissions, 4pm 5<sup>th</sup> September 2022. A waiver of compliance with the time limit is requested from Council to accept this submission in accordance with Section 37 of the Resource Management Act 1991.

1. The submitter has an interest in development within the Greenfield Residential Area, outside of Aokautere.
2. On 6<sup>th</sup> September 2022 the submitter became aware that *Plan Change G: Aokautere Growth Area* (PC-G) had broader application on the Greenfield Residential Area under the Palmerston North City District Plan as it applies in other areas of the City (beyond Aokautere). This is not readily apparent from plain reading of:
  - a. the public notice;
  - b. the explanatory material on PC-G available on Council's website; or,
  - c. the title of the Plan Change being "Aokautere Urban Growth".
3. On 6<sup>th</sup> September 2022 the submitter contacted Council's Principal Planner, Michael Duindam, to advise that it intends to lodge a late submission.

## SO 104-2

4. Whilst it is a decision for Council. the submitter considers that it is appropriate to waive the time limits and accept this late submission, noting that:
  - a. No persons are directly affected by the waiver;
  - b. It is in the interests of the community in achieving adequate assessment of the effects of the plan change; and
  - c. Acceptance of the submission will not conflict with the Council's duty under section 21 of the Act to avoid unreasonable delay.

### Introduction

5. This submission relates to: *Sections 7A Greenfield Residential Areas* and *Section 10 Residential Zone*. In particular, the submitters concern relates to amendments to Rule 10.7.4.6 and associated proposed assessment criteria (k).

### Submission:

6. Our understanding of Plan Change G from the consultation material published with the plan change is that the Plan Change was specifically designed to facilitate urban growth within Aokautere. We understand there has been a Retirement Village option put forward with associated provisions to ensure the design of any retirement village meets the key principles and intended outcomes of the Aokautere Structure Plan.
7. The s32 report goes on to discuss these new provisions as being the most efficient and effective way to enable a retirement village in the Aokautere residential area that meets the objectives of the plan change, specifically *Objective 15 – To ensure a high quality, integrated, and safe built form environment in the Aokautere Residential Area that reflects the scale, form and density of use and development within the Aokautere Structure Plan and is compatible with the surrounding environment.*
8. The submitters concern lies with the implications of the proposed amendments to Section 10 of the Greenfield Residential Area and, as currently drafted, will apply to all retirement villages in Greenfield Residential Areas. Based on the contents of the s32 report, we assume that this was not intentional as no assessment of this wider implication has been made as required under s32 of the RMA.
9. Particularly, the submitter is concerned with the Assessment Criteria in Rule 10.7.4.6, which states:

*In respect of R10.7.4.6, and where they are proposed in Greenfield Residential Areas, how any activity:*

- *is located as shown on any relevant structure plan and/or precinct plan;*
- *provides for the roading and street layout as shown on the relevant structure plan and/or precinct plan;*
- *positively fronts, and integrates with, any Local Business Zone, including as directed by any relevant structure plan and/or precinct plan;*
- *is consistent with the design principles described for that Greenfield Residential Area in section 7A of the District Plan;*

### SO 104-3

- *contributes to positive streetscape outcomes in the Greenfield Residential Area, including any Local Business Zone. This includes, but is not limited to;*
    - o *active frontages with visible entrances onto streets*
    - o *dwellings fronting internal routes and throughfares and where relevant, public streets*
    - o *consistent front-to-front and back-to-back relationships amongst dwellings*
    - o *fronting of Activity Streets by communal buildings*
    - o *visually interesting street-facing elevations of communal buildings*
    - o *coherent built active edges along any Activity Street within a neighbourhood centre, part of which must include a publicly accessible commercial activity*
    - o *horizontal and vertical scale of communal buildings complements mixed use development in any neighbourhood centre*
    - o *landscaping*
    - o *avoidance of blank walls fronting the public realm*
    - o *integration with the surrounding road network including with well distributed on-site connections to the surrounding public road network*
    - o *layout of internal routes and throughfares, including paths, generally integrating with the layout of the Greenfield Residential Area Street layout*
    - o *high amenity connections to open space and reserves including coordinated design of communal buildings and open spaces*
    - o *garage setbacks.*
  - *is supported by available operational transport infrastructure necessary to service the activity, and in the case of the Aokautere Residential Area, the transport network requirements set out in R7A.5.2.2 are met.*
10. PC-G has been proposed with a Structure Plan developed with a high-level of detail, informed by a Master Plan. It includes options for a retirement village within the Aokautere Structure Plan.
11. Other Structure Plans relevant to Greenfield Development Areas include:
- a. The Whakarongo Residential Area Structure Plan;
  - b. The Kikiwhenua Residential Structure Plan; and
  - c. The Whiskey Creek Structure Plan (currently being decided by Commissioners).
12. The assessment criteria requires retirement villages to be:
- a. *“located as shown on any relevant structure plan and/or precinct plan”*. This is only relevant to the Aokautere Growth Area.
  - b. *“the roading and street layout as shown on the relevant structure plan and/or precinct plan”*; and,
  - c. *“consistent with the design principles described for that Greenfield Residential Area in section 7A of the District Plan”*. This applies to all development within the Greenfield Residential Area (as per Policy 2.1 – Section 7A); and, in relation to the proposed Design Principles in the Whiskey Creek Residential Area (Policies 2.8 and 2.9 of the Private Plan Change). The submitter is not aware of any other design principles that apply, specific to the Whakarongo or Kikiwhenua Residential Structure Plan.
13. The submitters concern remains that the provisions seek to retrofit retirement villages into the pattern “as shown” on structure plans which appear to have been originally developed based on conventional residential subdivision patterns. These structure plans have not had prior consideration of the specific characteristics of retirement villages, including: the range/diversity



of activities (such as hospital care facilities, club-houses and other facilities/amenities etc); the mixed building/unit typologies; smaller net site areas, sections depths etc; specific functional needs of retirement villages etc.

- 14. The assessment criteria dictate prescribed solutions “as shown on the relevant structure plan”. This is inconsistent with the matters of discretion for subdivision in the Greenfield Residential Zone under Rule 7A.5.2.1 which considers “*the extent to which subdivision and development is in general accordance with the relevant Structure Plan for the area*”. Furthermore, this approach differs, for example, from the proposed provisions in the Whiskey Creek Plan Change (Policy 2.9) which enables a decision-making framework for consideration of a *development* which is not in general accordance with the relevant structure plan.

**Relief Sought**

- 15. The submitter requests that the assessment criteria under Rule 10.7.4.6 (k) apply to the Aokautere Residential Area only where development is informed by a Masterplan. The submitter requests that the assessment criteria under Rule 10.7.4.6 (k) does not apply to other Greenfield Residential Areas.
- 16. Should the assessment criteria under Rule 10.7.4.6 (k) apply in other Greenfield Residential Areas the design principles for each relevant Structure Plan should be clearly articulated, as this is not presently the case for either the Whakarongo Residential Area or the Kikiwhenua Residential Area (only the Whiskey Creek Private Plan Change). A decision-making framework should also be enable the consideration of appropriate deviations and/or alternatives to the Structure Plan where it is consistent with and/or achieves the relevant design principles.

Signed by Privacy s7(2)(a) (on behalf of Arvida Group Ltd):



.....

**Dated: 9 September 2022**

**Address for service:**

# SO 105-1

## Submission to PNCC

### Proposed Plan Change G - Aokautere Urban Growth

**From:**

Bruce Ralph Wilson

Privacy s7(2)(a)

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I cannot gain any trade competition advantage from this submission.

#### *Supporting information*

*The specific provisions of the proposal my submission relates to are:  
Give details. For example, page number, provision or map number.*

(a) the whole proposed plan change

(b) Appendix 5, especially pages 34-33, locations 1-4.

*My submission is:*

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

a) in general, I support the intentions of the proposed plan change

(b) At this time I do not find that I have enough information to support some of the proposals, especially in relation to transport, landscape and stormwater matters.

I will illustrate my concerns with comments on some aspects on which I have clear anxieties.

(i) Appendix 5 (Transport) recommends mitigation at a range of locations.

I make my observations based on running and cycling up and down Summerhill Drive from 1980 to the present time, residing at Aokautere from 2001 to 2020, representing the area as a City Councillor from 2007 to 2013, and being Chair of the PNCC Hearings Committee and an RMA Commissioner.

As I presently understand the recommended mitigations for locations 3 and 4 I have deep reservations about whether these proposals are likely to be safe for

## **SO 105-2**

pedestrians or cyclists, or willingly accepted by motorists, although I agree that the current situation at each location needs to be changed.

(ii) Having watched some unplanned land movements in the Plan Change area following adverse weather events, I would seek to be satisfied that the proposals are likely to accommodate the type of rainfall event such as experienced in the Nelson-Marlborough region in August 2022.

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

That the Transport Management proposals not be approved in their present form, and that adequate regard be given to the nature and timing of the mitigation measures after thorough consultation with suitable representatives of the three basic user groups.

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I wish to be heard in support of my submission.

I would consider presenting a joint case in a hearing.

*B R Wilson*

5 September 2022

# FUTURE USE OF ADDERSTONE RESERVE **SO 106-1**



**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.

Submissions close  
**4pm, Monday 5 September 2022**

For more information, see our privacy statement, [pncc.govt.nz/privacy](http://pncc.govt.nz/privacy)

#### 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](http://pncc.govt.nz/adderstone)

#### Emailing to:

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

### YOUR CONTACT DETAILS

First name **CATHERINE**

Last name **SIMS**

Organisation / If applicable

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)

### YOUR SUBMISSION

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

**I LIVE ON TURITEA ROAD AND WILL BE AFFECTED BY THE TRAFFIC THAT WILL BE SEVERELY INCREASED AT THE INTERSECTION OF TURITEA ROAD AND 'FITZHERBERT ROAD EAST'**

# FUTURE USE OF ADDERSTONE RESERVE

SO 106-2



## 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 SUPPORT THE INCREASE IN HOUSING SINCE P.N  
REQUIRES MORE HOUSING IN THE FUTURE.  
HOWEVER I AM EXTREMELY CONCERNED THAT THE  
INFRASTRUCTURE FOR TRAFFIC MANAGEMENT HAS  
NOT BEEN CONSIDERED AS A PRIORITY.

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

1. ANOTHER BRIDGE! (AS WAS CONSIDERED 20 YRS AGO  
+ REJECTED).
2. A ROUNDABOUT AT THE TOP OF TURITEA ROAD?
3. CONSIDERABLE THOUGHT GIVEN TO TRAFFIC INFRASTRUCTURE/  
MANAGEMENT BEFORE THE RESERVE IS STARTED.



### 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

*Colleen Puns*

Date

30/8/22.

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

# SO 107-1

## Future Use of Adderstone Reserve

Your contact details	
First name	Prabandha
Last name	Samal
Organisation	
Hearing	
Do you want to speak to Council in support of your submission?	Yes
Your submission	
The specific part/s of the proposal my submission relates to are as follows:	Proposed plan Change G (PC G) to provide for additional housing supply in Aokautere and the City, over the medium to long term.
My submission is:	<p>I OPPOSE this proposal and my reasons for opposing are:</p> <ol style="list-style-type: none"><li>1. The green background, mountain &amp; windmill views behind my Johnstone Drive home are lovely and a delight to watch. The RURAL ambience is something to behold. In today's world, life is busy and fast-paced, which is nicely offset by the rural settings Aokautere offers with the tranquility and perfect relaxed atmosphere to rest and recover at home. Aokautere has a rural setting with a natural beauty and uniqueness that should be protected and preserved.</li></ol> <ul style="list-style-type: none"><li>• If the proposed plan is put to action, then natural flora and fauna including native bird life (such as Tui, Pukeko, wax-eye, robin) and shrubbery will be adversely impacted.</li><li>• The proposed development plans will adversely impact pollination enabled by insects in the area that contribute to propagation of our wildlife.</li><li>• The current levels of traffic on the roads around Aokautere is already so heavy that its leading to high wear and tear, resulting in lots of pot holes, unevenness, overall poor road quality compromising safety on roads, increasing maintenance of cars, and impacting on environment and sustainability.</li><li>• The landscape and scenic views that attracted us to live in this picturesque neighbourhood will be lost by the proposed new developments obscuring our scenery completely.</li><li>• There will be more noise pollution all around, including increased construction activities, soil levelling etc.</li><li>• The proposed development will adversely impact on the surrounding natural landforms. There will be significant Earthworks construction leading to dust and noise pollution.</li><li>• The open space and gully behind Johnstone Drive will be lost.</li><li>• The house at 26B Johnstone Drive was built facing East to capture the</li></ul>

## SO 107-2

	<p>scenic beauty of the ranges. The development of new houses with north-facing houses will lead to complete loss of privacy, apart from congestion and crowding.</p> <ul style="list-style-type: none"><li>• The PNCC needs to be forward thinking. This is the 21st century and we need to protect our environment for future generations. All of the gullies should be protected as they are a significant natural features to Aokautere. The gully's are the beautiful characteristics of the contour of the land, views, trees, wildlife and openness.</li></ul> <p>These are the views of both myself and my wife (Choudhury Sanghamitra Samal) and we both strongly oppose the development plan in its current proposal.</p>
I seek the following decision from Palmerston North City Council:	<ol style="list-style-type: none"><li>1. Review the proposed plan. The plans to have a Rest Home may go ahead.</li><li>2. The decision to have more houses behind Johnstone Drive should be abandoned. Instead, lining up with trees and walkways would be an option that would go a long way in beautifying the area and maintaining the rural setting, tranquility and scenic beauty of Aokautere.</li><li>3. Provide details on how exactly the the gully/low-lying areas behind Johnstone Drive will be filled and made into buildable areas.</li><li>4. Undertake further consultation once revised plans are put in place.</li></ol>