

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
Doug Kidd S18.003	General – No specific provision referenced	Amend	Notes that during city council hearings to rezone the Waterloo Reserve, a Councillor outlined that the developer had raised concerns regarding the safety of pedestrians and cyclists if the reserve was retained and considers that the safety of city residents and visitors is important.	Clarify the councillor's and developer's concerns regarding the safety of pedestrians and cyclists.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Support - Pedestrian and cyclist safety in the RRA, clarification and resolution of issue(s).</li> </ul>	Recommend to reject the original and further submission.  The submission point is covering a matter that is not part of the plan change. Rather the comment relates to a separate process around the Waterloo Reserve Exchange.  As discussed at the prehearing meeting, staff involved in this plan change are not aware of the context in which the statement was made.  In regards to the safety of pedestrian and cyclist safety refer to submission point number S11.008.
Edrei Valath S06.002	General – No specific provision referenced	Oppose	Concerns that rapid residential growth without considering school capacities could drastically impact the quality of education in the community.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.  <b>Further Submission by Frances Holdings Limited:</b> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Support – Strain on local education resources.</li> </ul>	Recommend to reject the original submission. Recommend to support in part the further submission by Frances Holdings Limited, and reject the further submission by Ms Watson.  For comments regarding schools refer to submission point number S02.001.  The District Plan is not generally used to require the phasing of development unless critical infrastructure is not available. There is no reason to phase the project from an infrastructure perspective, as there are sufficient provisions in the Plan Change to manage servicing effects.  The provisions are considered to be appropriate to manage stormwater management before and after a future upgrade of the pipe discharge. It is expected that development will naturally occur over time similar to other areas in the city such as the Hokowhitu Lagoon and Aokautere Residential Area.
Edrei Valath S06.005	General – No specific provision referenced	Oppose	Concerns that nearby shops and small businesses may struggle to meet the sudden surge in demand from new residents.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.  <b>Further Submission by Frances Holdings Limited:</b> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Strain on local businesses and shops.</li> </ul>	Recommend to reject the original submission. Recommend to support in part the further submission by Frances Holdings Limited, and reject the further submission by Ms Watson.  As stated in submission point number S06.002, there is no requirement for a phased approach.  As outlined in the evidence of Mr Grooms evidence, there is sufficient capacity in the roading network for the traffic movements as development occurs.
Edrei Valath S06.003	General – Open Space and Recreation	Oppose	Concerns about the absence of nearby parks, playgrounds and recreational facilities proposed could negatively impact the quality of life for incoming residents and place undue stress on existing ones.	Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.  <b>Further Submission by Frances Holdings Limited:</b> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul>	Recommend to reject the submission. Recommend to support in part the further submission by Frances Holdings Limited, and Ms Watson.  As stated in submission point S06.002 there is no requirement for a phased approach in the proposed provisions for the Roxburgh Residential Area.  Mr. Phillips has outlined in his Statement of Evidence that there is a sufficient amount of suburban and neighbourhood recreational facilities in proximity to the plan change area, along with the reserve land shown on the structure plan.  This existing recreation provision is considered to meet Councils level of service for recreation provision for greenfield residential land development set out in the Parks Asset Management Plan.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
				<b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Lack of recreational and community facilities.</li> </ul>	In addition, a new accessway is proposed by providing a new single public access to the river and associated amenities. Therefore overall there is sufficient recreational space for the rezoning of the Roxburgh Residential Area.
Edrei Valath S06.004	General – Open Space and Recreation	Oppose	Concerns that increasing housing density next to a reserve area could compromise the natural landscape and reduce the peaceful experience. More people accessing the reserve could lead to erosion, littering, and general wear and tear on pathways and natural habitats.	<p>Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.</p> <p><b>Further Submission by Frances Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Environmental impact on local reserves.</li> </ul>	<p>Recommend to reject the submission. Recommend to support in part the further submission by Frances Holdings Limited, and Ms Watson.</p> <p>As stated in submission point S06.002 there is no requirement for a phased approach to development to be specified in the District Plan.</p> <p>Refer to comments in submission point S06.003 for comments regarding the provision of recreation facilities in proximity to the plan change area.</p> <p>Section 11.8 of the Parks and Reserves Report found in Appendix E of the Section 32 Report outlines the details of the Manawatu River Entrance development. Council has budgeted \$153,000 excluding GST under Programme 1856. Manawatu River Park Roxburgh Entrance Development in the adopted Long Term Plan 2024-34. This budget in 2025/26 enables Council to develop the river entrance, including a footpath.</p> <p>Mr. Charnley prepared 3D images of what the worst-case development could look like when viewed from various points within the Manawatu River Corridor. The images have utilised maximum site coverage, minimum lot size, separation distances, maximum height and height in relation to boundary. Refer to Appendix 5 for details of the images and what can be seen at different points from the Manawatu River Reserve.</p> <p>No changes to the provisions are required.</p>
Edrei Valath S06.001	General – Traffic and Transport	Oppose	Concerns that the development could add hundreds of additional vehicle trips daily, causing bottlenecks and hazardous conditions at key intersections.	<p>Council to reconsider the scale and pace of this project. A phased approach to the construction to allow necessary adjustments to traffic, safety measures, and educational and recreational capacity to better accommodate gradual growth.</p> <p><b>Further Submission by Frances Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose - Traffic and safety concerns.</li> </ul>	<p>Recommend to reject the submission. Recommend to support in part the further submission by Frances Holdings Limited, and Ms Watson.</p> <p>Refer to submission point number S06.002 about phased development approach.</p> <p>Mr. Groom has confirmed in paragraph 14 of his evidence that the site, once fully developed for residential housing, is expected to result in approximately 83 peak period trips and 707 daily trips over a typical weekday. The prediction is based on 104 residential lots being developed with a trip generation rate of 0.8 per household in the peak hour and 6.8 per house per day.</p> <p>In February 2025 traffic counts were undertaken in Roxburgh Crescent. Mr. Groom has reviewed those counts and notes in paragraph 17 that “<i>The average weekday traffic volumes recorded in 2025 is 539 vehicles for Roxburgh Crescent south and 343 vehicles for Roxburgh Crescent north. This compares to traffic volumes in 2019 that were 660 vehicles for Roxburgh Crescent south and 730 vehicles for Roxburgh Crescent north.</i>”</p> <p>Mr. Groom further notes that the 2019 traffic volumes represent a situation where the largest parcel of land within Roxburgh Crescent was in productive use. If the plan change was fully developed for residential development, it would result in a net reduction in peak hour and all-day traffic demands compared to the previous industrial land-use activities within the proposed Plan Change area.</p> <p>Based off Mr. Groom’s evidence, there is sufficient capacity available to support traffic generated by the proposed Plan Change area without having a detrimental impact on the safe and efficient operation of the network.</p>
Frances Holdings Limited	Section 32 Report – Appendix D:	Support in part	The submitter notes that there is an error in the WSP Transport Assessment namely Figure 4-8	No specific change requested.	Recommend to reject the submission.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
S11.004	Transportation Assessment		which states that the photo is an example of a 13m wide corridor. The submitter has measured that road width at 14m, which is 1.2 m wider than Roxburgh Crescent.		<p>As outlined by Mr. Groom in paragraph 32 of his evidence that <i>The purpose of the figure was to provide an example of a narrow residential street in Palmerston North with a 1m discrepancy being inconsequential as at Roxburgh Crescent a narrower berm is proposed.</i></p> <p>Additionally, Mr. Groom has outlined in paragraph 38 of his evidence that</p> <p><i>The structure plan for Plan Change E retains and extends the existing street network with Roxburgh Crescent having a width of 12.8m to 14.0m depending on the point of measurement. 549 Ruahine Street to 9 Roxburgh Crescent is 13.0m wide, 9 Roxburgh Crescent to 33A Roxburgh Crescent is 12.8m wide and 33A Roxburgh Crescent to 521 Ruahine Street is 14.0m wide.</i></p> <p>I concur with Mr. Groom's evidence. However, through discussions at the prehearing meeting it was agreed to include a reference to a 'minimum' 13m wide road. This allows flexibility for the developer if they wish to build a wider road. As outlined in the body of my s42a Report, Council has accepted that a departure from the engineering standards is acceptable for this brownfield site..</p>
Frances Holdings Limited  S11.001	Section 32 Report – Appendix J: Stormwater Servicing Assessment	Support in part	<p>Section 5.3.1 of the Section 32 Evaluation Report misrepresents the Stormwater Servicing Assessment undertaken by GHD Ltd, noting that as the Plan Change area is currently 100% impervious there will not be increased flows generated from the site as a consequence of redevelopment. Although the assessment states that an increase in permeability will improve service levels the feasibility of this is doubtful given the existing ground conditions and will also be restrictive in terms of residential design opportunities for the area.</p> <p>Additionally, it is noted that there may be other acceptable solutions in terms of water sensitive design other than permeable surfaces and on-site attenuation.</p>	<ol style="list-style-type: none"> <li>1. Delete the permeability standards in Rule 10.6.1.8 (d).</li> <li>2. Either delete Policies 17.2, 17.3 and 17.4 or amended to reflect the points raised in the submission.</li> </ol> <p><b>Further Submission by Rangitāne o Manawātū:</b></p> <ul style="list-style-type: none"> <li>• Position: Oppose.</li> </ul> <p><b>Further Submission by Horizons Regional Council:</b></p> <ul style="list-style-type: none"> <li>• Position: Oppose the submission.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>• Position: Neither support in full nor oppose in full - Amendments to address Section 32 Stormwater summary and Stormwater Servicing Assessment discrepancies.</li> </ul>	<p>Recommend to reject the submission. Recommend to support the further submission by Rangitāne o Manawatu, Horizons Regional Council. Recommend to support in part the submission by Ms Watson.</p> <p>Objective 17, Policy 17.2, Policy 17.3, Rule 10.6.1.8(d), and Rule 10.6.5.6 have been drafted in response to the Storm water Servicing Report, and the NPS-FM. The provisions are also not in conflict with the Council's Engineering Standards which encourage water sensitive design.</p> <p>Clause 3.5(4) of the National Policy Statement for Freshwater Management requires District Council's to <i>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.</i></p> <p>I consider that the plan change provisions give effect to RPS-UFD-P8 within Horizon's One Plan. Proposed Objective 11, Policies 11.5 &amp; 11.8, and Rule 7.6.2.6(d)(iii) &amp; (iv) within Section 7 – Subdivision provides the framework to ensure storm water effects from development is managed through water sensitive design principles. These provisions above align with RPS-UFD-P8 which requires development to minimise its contribution to climate change through the use of (but not limited to) water-sensitive design and nature-based solutions).</p> <p>I consider that the proposed provisions have taken into account the NPS-FM requirements as appropriate objectives and policies have been incorporated to meet Clause 3.5.4.</p> <p>Ms. Wood has outlined in paragraphs 81 and 82 of her evidence that:</p> <ul style="list-style-type: none"> <li>• <i>Water sensitive urban design (WSUD) is identified in PNCCs Engineering Code of Practice (5<sup>th</sup> Edition) and a fundamental aspect of this is to reduce runoff volume and flow rates generated in the first instance. There are other options available in terms of WSUD but these options tend to focus on collecting and managing runoff after it has been generated.</i></li> <li>• <i>The use of specified minimum permeability requirements is necessary to align with modelled runoff and capacity assessments and to provide the ability for some development to occur until wider capacity improvements are in place..</i></li> </ul> <p>Ms. Wood considers that the permeability provisions meet the requirements of WSUD and network capacity requirements. These provisions do not provide flexibility when it comes to permeable surface standards and WSUD requirements..</p> <p>Residential development will increase storm water flows, as outlined in the Stormwater Servicing Report. The future upgrade to the outlet (should resource consent be approved) will reduce storm water effects. However, this upgrade does not mean that Council can disregard water sensitive design in the Roxburgh Residential Area.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p>As outlined in the s32 evaluation report there are two different permeability standards in the proposed provisions. The lower permeability standard will be available to plan users if the upgrade to the storm water outlet pipe is successful. However, the upgrade of the pipe itself is a consenting matter between Council's Infrastructure Unit and Horizons Regional Council and is outside the control of PCE. If the upgrade of the pipe outlet is unsuccessful for whatever reason, the higher permeability standard is available to developers to provide for buildings in the RRA as a permitted activity.</p> <p>At the time of preparing this evidence, the submitter has not provided any technical evidence to demonstrate that the proposed provisions are unnecessary or that the stormwater assessment has been completed with a fatal flaw. On that basis, taking into account the evidence by Ms. Wood, I do not support the changes sought by the submitter and recommend no changes are made to the permeable surface requirements.</p> <p>See submission point number S11.019 for additional comments.</p> <p>Refer to comments under submission points S11.019 regarding policy 17.3.</p> <p>Refer to comments under submission point S11.021 about the permeability provisions.</p>
Horizons Regional Council  S22.014	General – Energy Efficient Development	Support in part	Outlines that One Plan RPS-EIT-P5 provides direction to territorial authorities regarding energy efficient development	<p>Align the plan change with the energy efficiency directives outlined in the One Plan.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Energy efficiency planned into site development in alignment with One Plan</li> </ul>	<p>Recommend to accept the submission in part.</p> <p>Recommend to support the further submission in part by Ms. Watson.</p> <p>This submission point was discussed during the prehearing meeting with Horizons Regional Council. As outlined in paragraph 120 of Mr. McDonald's evidence the proposed street layout facilitates east/west orientated lots, with the exception of those which border the Tilbury Avenue properties. <i>"Covering most of the re-zoned area, this east-west 'grain' provides compact dwellings with good front and rear sun. This orientation also favours long north-facing roof planes that are suitable for solar panels."</i></p> <p>Existing Objective 3, and corresponding policies, in the Residential Zone provides direction for housing development to be energy efficient. These provisions also apply to the Roxburgh Residential Area and are considered to be consistent with the direction in the One Plan.</p> <p>Council cannot require persons to use solar energy mechanisms in development beyond what is already provided for in the District Plan.</p> <p>PCE also aligns with the Eco City Strategy by encouraging less carbon intensive development through the efficient reuse of land for housing. PCE is less carbon intensive when compared to greenfield development as there are existing services that are sufficient for residential growth. The proximity of bus stops enables active transportation to be readily used. The structure plan layout has been designed to optimise sunlight and daylight while not compromising on yield for housing.</p> <p>Overall, the existing provisions in the District Plan along with the proposed structure plan gives effect to the direction contained in the One Plan.</p>
Horizons Regional Council  S22.013	General – Land Disturbance	Support	<p>Advises for land with pre-existing slopes of less than 20 degrees up to 2,500m<sup>2</sup> of land disturbance per property is permitted per 12-month period and for disturbance greater than 2,500m<sup>2</sup> that One Plan Rule RP-LF-LAND-R6 should be referred to.</p> <p>Additionally, for any proposed structures within or near waterways, One Plan Rule RP-</p>	<p>No specific decision requested.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position. No comment/opinion, except unsure how land disturbance mentioned here might or might not relate to the soil disturbance of NES Soil Permitted Activity as mentioned in the DSI Contamination Report.</li> </ul>	<p>Recommend to accept submission in part in so far as amending the guidance note regarding 8m within the inland toe of the stop bank. Recommend to support in part the further submission by Ms. Watson.</p> <p>There is an explanation within Section 6 of the Earthworks Section in the operative district plan which alerts plan users to the earthwork's provisions of the One Plan.</p> <p>As discussed and agreed with Horizons during the prehearing meeting, an amendment to the guidance note in Rule R10.6.1.8 regarding works within 8m of the inland toe of the stop bank would provide additional clarity to plan users. The 'Note to plan user's' content within the District Plan has no legal status but does provide additional guidance for plan users. Therefore,</p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			LF-AWBD-R63 for culverts and Rule RP-LF-AWBD-R64 for other structures (including bridges, fords and other access structures) needs to be considered. Land disturbance is also subject to NES Freshwater.		<p>changes are also recommended that 'may' be required, not 'will' be required. Wording of the advice note has been agreed to between Council Officers and Horizons.</p> <p>In regards to the references to other structures, there are no specific changes required to the Plan as those structures not are relevant to this site.</p> <p>Recommended that the guidance note in R10.6.1.8 is amended as follows:</p> <p style="padding-left: 40px;">Any excavation, or earthworks (including planting of trees and shrubs) or structures (including some fences) on or within 8m of the inland toe of the stopbank or any other structure that is maintained by Manawatu-Whanganui Regional Council for the purposes of flood control <del>may</del> will require consent from Manawatu-Whanganui Regional Council. Plan users are advised to consult with the Manawatu-Whanganui Regional Council for any works on or within 8m of the inland toe of the stopbank."</p>
Horizons Regional Council S22.001	General – No specific provision referenced	Support	Supports the plan change as it contributes to creating a well-functioning urban environment by supporting the housing targets set in the Palmerston North Future Development Strategy 2024. The approach aligns with the One Plan objective RPS-UFD-O1 and policy RPS-UFD-P1.	No specific decision requested.	<p>Recommend to accept the submission in part.</p> <p>Retain the provisions as notified, expect for any changes recommended throughout the s42A report.</p>
Horizons Regional Council S22.006	General – Stop banks	Support	<p>The new public entrance to the Manawatu River pathway will occur on the stop bank, and resource consent may be required under One Plan Rule LF-AWBD-R68.</p> <p>If higher flood protection standards are required in the future, Horizons may need to upgrade the stop bank, which could necessitate alterations to the public entrance path.</p>	No specific decision requested.	<p>Recommend to accept the submission.</p> <p>Refer to the discussion under S22.013 which recommends changes to the Guidance Note.</p> <p>Retain the provisions as notified, expect for any changes recommended throughout the s42A report.</p>
Horizons Regional Council S22.008	General – Storm water and Flooding	Support	Stop bank provides protection against riverine flooding, but it does not safeguard the area from localised flooding or stormwater inundation. Encourages additional on-site mitigation strategies to control runoff rates from development. Increased runoff from new developments can exacerbate flooding downstream.	<p>No specific decision requested.</p> <p><b>Further Submission by Frances Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part.</li> </ul>	<p>Recommend to accept the submission. Recommend to support in part the further submission by Frances Holdings Ltd.</p> <p>As outlined in the paragraphs 5.13-5.19 of my s42A report, stormwater has been carefully assessed both prior to notification and as a result of the submissions received. Based on the evidence of Ms Wood, the proposed stormwater provisions are necessary to manage stormwater effects in the wider catchment, noting the specific recommended changes in this Report.</p> <p>Future residential development in Roxburgh Crescent would be subject to the same likelihood of flooding from breaches or overtopping of the stop bank as surrounding residential land within the Hokowhitu suburb.</p> <p>In addition, Mary Wood has outlined in response to the submission point:</p> <ul style="list-style-type: none"> <li><i>The consequence of a breach in the stop bank will change as a result of the change in land-use from industrial to residential. The likelihood of a breach is difficult to assess at</i></li> </ul>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p><i>this time and the consequences of such as breach would impact larger portions of Palmerston North, as identified in in the Stormwater Assessment. Improvement works undertaken by Horizons Regional Council are expected to have reduced the risk of a breach.</i></p> <p>The stop bank is managed by Horizons and any improvement works would be undertaken by them. At the time of preparing this report, we understand there are no upgrades of the stop bank in this location planned.</p>
Horizons Regional Council S22.009	General – Storm water and Flooding	Support	<p>Outlines that stormwater discharges to surface water and land is permitted under the One Plan.</p> <p>Caution is advised when discharging stormwater across sloping land due to the potential for erosion. Additionally, if stormwater is discharged via a reticulated network, a consent from Horizons may also be necessary.</p>	No specific decision requested.	<p>Recommend to accept the submission.</p> <p>Retain the provisions as notified, except where changes are recommended elsewhere in the s42A report.</p> <p>This submission point was discussed at our prehearing meeting with Horizons and no changes to the Plan provisions was required.</p>
Horizons Regional Council S22.010	General – Storm water and Flooding	Support	<p>Encourages on-site stormwater discharges to be directed away from wastewater land application areas as this can reduce the efficiency of the wastewater system to treat wastewater.</p> <p>If the site has poorly drained soils, stormwater management effects need to be considered as poorly drained soils have a water table that are close to the surface or a compact subsurface layer that limits the rate that water can drain through the soil.</p>	<p>Ensure that on-site stormwater discharges should be directed away from wastewater land application areas.</p> <p><b>Further Submission by Frances Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul>	<p>Recommend to accept the submission in part. Recommend to accept the further submission by Frances Holdings Limited.</p> <p>Retain the provisions as notified, except where changes are recommended elsewhere in the s42A report.</p> <p>The advice is noted however there are no wastewater land application areas in proximity to the plan change area. No changes are required to the proposed provisions as agreed through the prehearing meeting with Horizons.</p>
Horizons Regional Council S22.012	General - Transport	Support	Enables increased density in central parts of the city, which aligns well with public transport aspirations in the Regional Public Transport Plan (RPTP). The proposed connection to Ruahine Street is supported, as it provides good access to public transport.	No specific decision requested.	<p>Recommend to accept the submission in part.</p> <p>Retain the provisions as notified, except where changes are recommended elsewhere in the s42A report.</p> <p>No changes are required to the proposed plan provisions.</p>
Horizons Regional Council S22.011	Section 32 – Appendix G: Detailed Site Investigation	Support	Outlines that Lot 1 DP 74592 is listed on Horizons' database as a potentially contaminated site associated with hazardous substances.	<p>Adhere to the advice in the DSI, including obtaining the relevant resource consents with Horizons; and as outlined below:</p> <ul style="list-style-type: none"> <li>The NES-Assessing and Managing Contaminants in Soil to Protect Human Health will apply to the site if residential redevelopment is undertaken as HAIL activities have been, and are currently occurring on the site and subdivision and soil disturbance will likely be</li> </ul>	<p>Recommend to accept the submission. Recommend to support the further submission in part by Ms. Watson.</p> <p>Refer also to submission point S13.011 and S19.011 for comments about the NES-CS and use of Preliminary Site Investigations &amp; Detailed Site Investigations.</p> <p>Retain the provisions as notified, subject to changes outlined elsewhere in the s42A report, including 'note to plan users' under Rule 7.6.2.6.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
				<p>required during the redevelopment phase; and</p> <ul style="list-style-type: none"> <li>Due to the presence of asbestos, controls will be required during soil disturbance and redevelopment works in accordance with the Asbestos Regulations."</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Adhere to appropriate procedures/controls re HAIL contamination sites.</li> </ul>	
Jack McKenzie S04.001	General – Heights and Density  (R10.6.1.8(f) inferred)	Support	The height restrictions seem about right. More than one level is necessary to make better use of land, but more than two or three (as per the proposal) would be excessive and against the general 'nature' of the city. We need more higher density housing and the proposal is at the right level.	<p>Retain the proposal.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Building Heights as per Council proposal.</li> </ul>	<p>Recommend to accept the submission. Recommend to oppose the further submission by Ms. Watson.</p> <p>Support noted for Rule 10.6.1.8 (f).</p> <p>A minimum of two stories for dwellings is permitted in the Riverfront Area. Three stories are provided in the Riverfront Area as depicted in the Structure Plan. A mix of single and multiple storey dwellings can be enabled throughout the rest of the site, similar to other residential areas in Palmerston North.</p> <p>Recommend to retain Rule 10.6.1.8 (f) as notified.</p>
Jackie Carr S23.002	General – No specific provision referenced	Support in part	Outlines that there are nearby groups of native trees planted which increase the scenic value & local biodiversity.	<p>Establish a community garden.</p> <p><b>Further Submission by Francis Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support – Greenspace and community garden.</li> </ul>	<p>Recommend to reject the submission. Recommend to accept the further submission by Frances Holdings and oppose the further submission by Ms. Watson.</p> <p>The District Plan only formally recognises and protects notable trees. There are no such trees within the plan change site. Planting along the river frontage are historical and this plan change does not seek to change those trees.</p> <p>Mr Phillips outlines in Section D (S19) of his evidence that the STEM assessment for the large trees on the existing Roxburgh Reserve area. The trees do not reach the level required to be considered Notable Trees for inclusion in the District Plan.</p> <p>Refer to comments in submission point S06.003 for comments regarding the provision of recreation facilities in proximity to the plan change area.</p>
Jackie Carr S23.003	General – Storm water and Flooding	Support in part	Acknowledge as a result of climate change there is increased frequency of flooding etc is required and there is a need to adapt our plans accordingly.	<p>Adapt the plans to acknowledge climate change.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support – Climate change/flooding etc.</li> </ul>	<p>Recommend to support in part the submission. Recommend to support in part the further submission by Ms. Watson.</p> <p>In response to submission point s22.008, I outlined that river flooding and the maintenance of stopbanks is a Regional Council responsibility. In terms of climate change affecting stormwater ponding, Ms. Wood has confirmed in her Statement of Evidence that Climate Change has been included in the modelling for the Roxburgh Residential Area. <i>"Climate change has been considered both in terms of the ability of the local piped network to accommodate climate change adjusted flows, as well as local surface flooding from 1% AEP flood events. The current capacity of the piped network and its ability to accommodate future climate adjusted flows is one of the reasons for staging the development. With upgrades in place, the piped network capacity as part of redevelopment will be better aligned with current climate changes standards for the city."</i></p> <p>In addition, <i>"The TUFLOW modelling undertaken by Tonkin and Taylor includes climate change projections 2081-2100 under the RCP 6.0 scenario. The outputs from this model was reviewed during the stormwater assessment, along with the overall topography of the area. The modelled 1% AEP flood hazard in the area is largely the formation of overland flow paths along existing roads and small areas of shallow, localised ponding. This Plan Change area, including</i></p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p><i>nearby existing residential land, is slightly elevated than other areas to the west and the flood hazard is not expected to change with development. “</i></p> <p>As a response to submission S09.004, changes are recommended to the provisions to take into account Climate Change. Refer to the comments under submission point number S09.004.</p>
Jason Temperley S10.002	General - Stormwater	Amend	There are no stormwater easements, or no build zones shown on Figure 1 of the proposed plan raising concerns that surface flooding will continue to be a recurring issue.	<p>Amend the structure plan and provisions to outline an area for a storm water easement or no build area.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose - Stormwater easements/no-build zones.</li> </ul>	<p>Recommend to reject the submission. Recommend to support in part the further submission by Ms. Watson.</p> <p>The structure plan includes reference to a storm water easement and no build area over the existing storm water pipe. Council has no plans at this time to change the outfall location. Therefore, protecting the existing stormwater outfall pipe is important and the annotation retained on the Structure Plan. In addition, Policy 11.4 provides for infrastructure, in this case being the storm water pipe, to be protected through the use of no build areas, consent notices and access easements. No additional changes are considered necessary to the Structure Plan.</p> <p>Based on the stormwater assessment and the additional evidence of Ms Wood, the proposed stormwater provisions in the Plan Change will address the stormwater issues within the Roxburgh Residential Area.</p> <p>Refer also to submission S23.003 for additional comments about flooding.</p> <p>Refer also to submission point numbers S16.003, S16.004, S16.005, and S16.006 about discussion concerning natural hazards &amp; storm water.</p> <p>No changes to the provisions are recommended.</p>
Patrick Henderson S07.001	General – No specific provision referenced	Amend	Although the broader concept of the plan change is supported is concerned that there is not enough low cost first-time buyer homes in Palmerston North and that there are too many high value large homes being built.	<p>Future housing is dedicated to first home buyers, with an agreement in the event of sale that, the council has first option to purchase for on-sale to first home buyers.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – First time buyer homes in development.</li> </ul>	<p>Recommend to reject the submission. Recommend to reject the further submission by Ms. Watson.</p> <p>Issues regarding first-home buyers and council purchasing the dwellings for first-home buyers are not matters for the District Plan. Council leaves the option of how dwellings are bought and sold to the market which is standard practice in Palmerston North.</p>
Paul and Annette Gregg S12.001	General - No specific provision referenced	Support	Considers that the plan change provides a great opportunity for the Council to demonstrate that they are making provision for possible retreating in the future from flooding.	<p>No specific change requested.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Flood mitigation in development, buildings on piles rather than concrete pads.</li> </ul>	<p>Recommend to reject the submission. Recommend to support in part the further submission by Ms. Watson.</p> <p>The plan change area is adjacent to a 2.5m high stop bank which provides protection in a 1 in 500-year flood event, for Palmerston North City. The stop bank is managed by the Lower Manawatu River Scheme by Horizons Regional Council.</p> <p>As a result of the recommendations in the Stormwater Report and following Ms Wood's evidence in paragraph 101, no provisions are required for possible retreating from flooding.</p> <p>Refer also to submission S23.003 for additional comments about flooding and climate change.</p> <p>Refer also to submission S09.004 for comments about provision for climate change.</p> <p>Refer to submission point numbers and S22.008 for comments about development in proximity to the stop bank.</p> <p>Refer also to submission point numbers S16.003, S16.004, S16.005, and S16.006 about discussion concerning natural hazards &amp; storm water.</p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
Philip Nell S14.001	General – No specific provision referenced.	Support in part	Concerns about changes to the existing road layout and how that may impact current use and access to their units at 25 & 25A Roxburgh Crescent. Currently there are two access points, each about 4m wide, on the northern and southern sides of the site with off street parking for staff in between.  As there is currently no curbing on the western side of the road it is noted that this site access for staff and freight convenient.	Consider the current use of the owners and business occupiers in the road layout changes and the timing of this work.  <b>Further Submission by Doug Kidd:</b> <ul style="list-style-type: none"> <li>Position: Support the submission point.</li> </ul> <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Support – Consideration of existing use rights of business during site development.</li> </ul>	Recommend to accept in part the submission. Recommend to support in part the further submissions by Mr. Kidd and Ms. Watson.  As outlined by Mr. Groom at paragraphs 38 and 39 of his evidence the existing road alignment will change over time as the site transitions from primarily industrial activities to residential. Existing accesses will be maintained. No obstruction to off street parking on private property is anticipated. In addition, heavy vehicle access for deliveries and pickups, will still occur which is considered appropriate as traffic volumes and speeds on Roxburgh Crescent will be low.  When the Council seeks to upgrade the road layout in line with the proposed cross section, there will be consultation with, and notice given to existing landowners. The new roading design will need to recognise existing accesses, as part of future development.  The existing businesses within Roxburgh Crescent will still be able to operate in the same or similar manner that currently exists. These businesses will have existing use rights under Section 10A of the Resource Management Act 1991. Existing use rights will include the of access(es) to the sites.  No changes to the provisions are recommended.
Rangitāne o Manawatū S16.001	General – No specific provision referenced	Support in part	Broadly supportive of redeveloping this pocket of existing industrial activities for housing but considers risks to the health and safety of the people who end up living there, and the taiao, must be safeguarded from contaminated land, impacts on resident's amenity from ongoing industrial uses, poor water quality, and flooding.  Also considers that enabling new housing, in places safe from natural hazards and using quality building standards that prioritise healthy homes is essential to lifting Māori and Pacifica living standards and meeting Council's responsibilities under the Partnership Agreement and as a Te Tiriti partner.	Retain and adopt the notified provisions and structure plan provided that housing is safe from flood risk hazards and any risks from previously contaminated land and subject to further amendments to address the potential noise, stormwater and natural hazards effects of adopting the proposed provisions.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Mostly Support – General support for development.</li> </ul>	Recommend to accept the submission in part. Recommend to support the further submission by Ms. Watson.  As outlined in previous submission points, the various technical reports provided as part of the Plan Change, s32 report and relevant statements of evidence have demonstrated that future housing will be safe from flooding hazards and contaminated soils, subject to compliance with provisions in the District Plan and National Environment Standards.  Discussion about Housing and Flood Risks, refer to submission point number S16.009.  Discussion about noise, refer to submission point number S16.012.  Discussion about natural hazards & storm water, refer to submission point numbers S16.003 and S16.004, S16.005, and S16.006.
Rangitāne o Manawatū S16.002	General – Objectives and Policies	Support in part	Considers that water quality in the Manawatū Awa is poor and reduces Rangitane's ability to interact with wai and undertake cultural practices, thereby impacting on their cultural well-being.  Further considers that the plan change include strong policy direction to ensure that re-development of this brownfield land purposefully improves the health of the Manawatū Awa, prevents any further deterioration and avoids any loss of values, in line with the policy direction in the	Amend the proposed new objectives and policies in Section 10 and Section 7 for the Roxburgh Residential Area to address the following: <ul style="list-style-type: none"> <li>Redevelopment of the area assists in protecting and restoring the mauri of the Manawatū Awa, including through the capture and pre-treatment of stormwater on-site;</li> <li>Preferential use of indigenous species that would be expected to be present in that place when undertaking landscaping.</li> </ul> <b>Further Submission by Rosemary Watson:</b>	Recommend to accept in part the original and further submissions.  During the prehearing meeting with Rangitāne o Manawatū held on 25 February 2025, discussions were held regarding the submission point. I understand that the submitter considered that Council's submission and proposed changes to the provisions adequately took into account measures to address water quality effects.  Refer also to submission S09.001 regarding copper and zinc building materials.  Erosion and Sediment control measures would be required for land disturbance during construction phase, which are detailed in the Horizons One Plan.  The matters of planting raised are outside the scope of the plan change. Council is open to further discussions as part of the future development of the open space areas planned by the Parks team.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			NPS-FM 2020 and the RPS, in particular Objective RMIA-O1 Resource Management.	<ul style="list-style-type: none"> <li>Position: Mostly Support – General support for development.</li> <li>Reasons: I agree with the general sentiments expressed. Any Plan Change E development should at least not be to the detriment of river water quality, and if possible contribute to its improvement.</li> </ul>	<p>As discussed under submission S09.002, recommend that amendments to the proposed provisions include:</p> <ul style="list-style-type: none"> <li>Revision of Rule 7.6.2.6(d)(ii) to read as follows:  <u>How water sensitive design elements have been incorporated to manage stormwater quantity include water sensitive design elements</u> based on one (1) square metre of <u>rapid biofiltration</u> stormwater pit being provided <u>per contributing catchment area</u> of 270m<sup>2</sup>.</li> </ul> <p>Consequential changes will also be made to the cross sections.</p> <ul style="list-style-type: none"> <li>Addition of Objectives, Policies, and Rules in Section 10 – Residential Zone, to address effects on water quality of copper and zinc entering the stormwater system as outlined in submission S09.001.</li> </ul>
Rangitāne o Manawatū S16.009	General – Stormwater and Flooding	Support in part	<p>The Stormwater Servicing Assessment indicates that the stop bank near the Roxburgh Crescent Residential Area is susceptible to undermining and foundation failures, with a 15% probability of failure during a 1% AEP flood event based on 1993 conditions.</p> <p>A 15% chance of failure over 100 years is considered significant and needs to be adequately planned for, particularly as the assessment doesn't address how climate change might exacerbate these risks, with projected increases in annual precipitation and rainfall intensity in the Manawatū region and the likelihood that the area will attract households with older people and small children.</p> <p>Acknowledges that although the area is within the Lower Manawatū River Control Scheme's protection, where additional flood hazard measures may not be required under Regional Policy Statement HAZ-NH-P10, that R10.6.1.8 should adopt the policy direction in HAZ NH-P10 by requiring a safe access route between dwellings and an evacuation area.</p>	<p>Amend R10.6.1.8 and R10.6.3.3 to require an access route to a safe area for evacuation from dwellings, as described in clause 4b of HAZ-NH-P10 of the RPS.</p> <p>Ensure that any more than minor adverse effects on the effectiveness of existing flood hazard structures such as the existing stop banks, and overland stormwater flow paths are avoided.</p> <p>Retain the advice note to plan users regarding stop banks in R10.6.1.8 and cross-reference in any other relevant rules.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Mostly support – Flood risk management.</li> </ul>	<p>Recommend to accept in part the original and further submissions.</p> <p>Following the prehearing meeting with Horizons a revised Report on the stopbank failure has been provided that was prepared for the Regional Council. Ms Wood has noted at paragraph 41 of her evidence that</p> <p><i>I have also reviewed “Lower Manawatū Scheme Risk Assessment using River Manager Forum Assessment Tool” (prepared by Tonkin and Taylor, August 2022). This document provides an overview of risk classification for the stopbank system, including the area adjacent to the Roxburgh Plan Change area. Figures in the appendix of the Tonkin and Taylor report provide context to the overall stopbank risk assessment, which considered aspects such as channel aggradation, weakening of stopbank foundation, overtopping, instability of the stopbank body, and seepage and piping. Overtopping of the stopbank is considered unlikely in the Tonkin and Taylor assessment of the Plan Change area. Additional work was recommended to refine the assessment of this relatively complex scheme. In my opinion, this assessment did not indicate a different risk profile from overtopping at the Roxburgh site to the surrounding residential land.</i></p> <p>The standard for minimum floor levels under Rule 10.6.1.8(b) has been revised to allow for stormwater inundation levels predicted for a 1 in 50 year flood event. Ms. Wood does not consider that there is a requirement for a higher floor level within PCE (when compared with similar residential areas) where there are existing stopbanks in place. The plan change area is not located in an area susceptible to adverse surface flooding and is protected by a 1 in 500 year event by the existing stopbank. Therefore, I consider the revision to Rule 10.6.1.8(b) is appropriate as outlined in submission S09.004.</p> <p>On that basis no further changes are considered necessary to the Plan Change provisions.</p>
Rangitāne o Manawatū S16.011	Section 32 – Appendix F: Contamination Report – PSI & Appendix G: Contamination Report - DSI	Support	Notes that land within the plan change area is expected to qualify as 'priority contaminated land' as defined in Policy HAZ-WC-P7 Identification of priority contaminated land* in the Horizons One Plan Regional	<p>Retain the proposed 'note to plan users' underneath Rule 7.6.2.6.</p> <p><b>Further Submission by Rosemary Watson:</b></p>	<p>Recommend to accept the original and further submissions.</p> <p>Retain the provisions relating to note to plan users' underneath Rule 7.6.2.6 as notified or amended as outlined elsewhere in the s42A report.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			Policy Statement, particularly as the a Detailed Site Investigation prepared for the area has confirmed that a number of activities included in the MfE HAIL are currently, or have been historically, undertaken across the site.	<ul style="list-style-type: none"> <li>Position: Support - Contamination - retain note re contamination performance standards in R7.6.2.6.</li> </ul>	
Rangitāne o Manawātū S16.010	Section 32 – Appendix I: Liquefaction Report	Support	Supports a geotechnical investigation being undertaken to assess the potential for liquefaction risk within the plan change area.	No specific change requested.	Recommend to accept the submission. Retain the provisions as notified..
Rangitāne o Manawātū S16.003	Section 32 – Appendix J: Stormwater Servicing Report	Support in part	<p>Identifies within the Stormwater Servicing Assessment Report identifies that the existing stormwater network is insufficient for current industrial use and is "undersized for the catchment in general." Consequently, network upgrades are needed to accommodate future residential development, along with restrictions on impervious areas.</p> <p>A major upgrade identified is replacement of the stormwater outlet pipe to the Manawātū Awa, which will necessitate consent from Horizons Regional Council (HRC). HRC has indicated it will only consider this upgrade if it provides benefits to the wider catchment, that delays are expected due to the need for funding, consents, design, and construction.</p> <p>The assessment recommends setting impervious area thresholds based on development timing, with a requirement for 45% net site area before upgrades and 30% after the river outlet upgrade. Additionally, the Roxburgh North stormwater main must be upgraded to at least DN300 before any residential development can occur. While Rule R10.6.1.8 reflects changes in impervious surface requirements, it lacks clarity and does not mention the necessary</p>	<ol style="list-style-type: none"> <li>Publish the Stormwater Servicing Assessment Appendices referred to in the notified documents.</li> <li>Confirm that the upgrade to the Roxburgh North stormwater main has allocated Council funding and will be delivered before residential development occurs; or Amend the proposed rules if residential development occurs in advance of this upgrade.</li> <li>Amend Rule R10.6.1.8 to specify that the upgrade must be in place prior to the construction of houses and, if not in place, that construction of dwellings becomes a non-complying activity under Rule 10.6.5.6.</li> </ol> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Mostly Support – storm water servicing.</li> </ul>	<p>Recommend to accept in part the original and further submissions.</p> <p>The Storm Water Servicing Report outlines that construction of buildings can occur prior to the storm water outlet upgrades, provided that the permeability rules are adhered to. Once the stormwater upgrade is operational the permeable surface area standard reduces to 30% net site area.</p> <p>As outlined in paragraphs 5.12 to 5.17 of my s42A report, the Stormwater Report and the evidence of Ms Wood confirms that stormwater can be managed through the rezoning. Council is working on an upgrade, which is subject to a separate resource consent application and outside the scope of the plan change.</p> <p>Ms Wood has confirmed in her evidence in paragraphs 106 and 108-113 that the proposed requirements for biofiltration structures and the permeable surface requirements are sufficient to address stormwater in the interim. Refer to submission point S11.008 for additional comments on the timing of the storm water pipe outlet.</p> <p>Council's Development Contributions Policy 2024 outlines the programme for the storm water upgrades in Roxburgh Crescent (Programme Number 2324).</p> <p>Ms. Demado has provided a memo outlining the predicted timeline of the stormwater pipe outlet upgrade.</p> <p>Based on the advice from Ms Wood, there is no requirement for dwellings to be non-complying activities as development can occur prior to the storm water pipe upgrade.</p> <p>No changes are recommended as a result of this submission.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			<p>upgrade of the Roxburgh North stormwater main.</p> <p>Figure 7 suggests that this upgrade is budgeted in the Long-Term Plan. However, the funding section of the assessment does not reference this 'stage 1' work or provide details about Appendix C 'LTP Programme and cost estimate breakdown', thereby making it impossible to determine whether the Roxburgh North upgrade has been budgeted for, will be delivered, or when it will occur.</p>		
Rangitāne o Manawātū S16.005	Section 32 – Appendix J: Stormwater Servicing Report	Support in part	<p>Concerned that use of such methods as pervious pavers or similar technologies may be ineffective in achieving sufficient infiltration over the long term. These technologies can have a fairly high failure rate, and therefore a shorter life span than other types of stormwater mitigation, and are very susceptible to clogging from sediments, which then causes failure of the device.</p> <p>Consequently, the effectiveness of the proposed provisions will rely on future homeowners to maintain pervious paving in perpetuity and rely on consent notices to enforce this, noting that no provisions are proposed to address compliance monitoring of pervious paving within the plan change area.</p> <p>The extent to which Plan Change E is supported by sufficient evidence that the proposed impermeable surface limits will be effective in mitigating stormwater ponding/flooding within the catchment over the long term is also questionable.</p>	<p>Amend the methods sub-section in Section 10 to allow the council to undertake regular inspections of pervious pavements within the plan change area, along with providing information and guidance to homeowners on how to maintain and repair such paving, and the importance of not increasing impermeable areas within their properties.</p> <p>Or, require greater levels of stormwater treatment.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full - Stormwater - pervious technologies.</li> </ul>	<p>Recommend to accept in part the original and further submissions.</p> <p>During the prehearing meeting with the submitter, discussions were held about the permeable surface provisions and use of pervious pavers. The provisions still allow for options for higher permeable areas prior to outlet upgrade and allows for persons to develop. Council is confident that the 45% net site area permeable surface provision is robust, before the storm water outlet pipe is upgraded. Council to retain provisions for storm water permeable surfaces if challenged, as mitigation measures are critical.</p> <p>I acknowledge the concerns raised by the submitter. However, I consider that incorporating additional information about pervious pavements in the methods is not appropriate. The use of consent notices would better assist homeowners to understand their responsibilities while providing some guidance, as it would be contained on their Record of Title. The final wording on the consent notice would be determined at subdivision stage. Council Officer's would enforce and monitor the consent notice during the development stages and in perpetuity.</p> <p>In regards to the use of pervious pavements in the provisions, Ms. Wood has outlined at paragraph 114 of her evidence that <i>While permeable pavements are an option for reducing runoff, there can be challenges with life expectancy and maintenance. The latest version of PNCC's Engineering Standards for Land Development (March 2025) would not support use of permeable pavements within a residential area. It is recommended that reference to permeable pavements be removed from the provisions.</i></p> <p>I concur with Ms. Wood's evidence and recommend that the reference to pervious pavements in rule 7.6.2.6(d)(iv) is removed. There are also minor grammatical changes also proposed to ensure the standard makes sense.</p> <p>Recommend to amend rule 7.6.2.6(d)(iv) as follows:</p> <ul style="list-style-type: none"> <li>Provide treatment of road stormwater through <del>pervious pavements</del>, grassed <u>areas</u> and other biofiltration devices prior to entering the Council stormwater network to improve the quality of the stormwater discharge.</li> </ul> <p>Proposed Policy 11.5 already outlines consent notice requirements for managing pervious surfaces. However, it is recommended to amend Policy 11.5 to provide clarity to plan users that consent notices need reference to maintain pervious area requirements. The matter was discussed with Rangitāne during the prehearing meeting and agreed to.</p> <p>Recommend to amend Policy 11.5 as followed:</p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<ul style="list-style-type: none"> <li>To impose consent notices on titles outlining measures required <u>to manage and maintain</u> pervious surfaces and land contamination.</li> </ul>
Robert M Hodgson S08.001	General – Climate Change and Flooding	Support in part	Although generally supportive of the proposal is concerned that in light of climate change, increased river flows and frequency of major floods, a conservative approach is taken to the design, location and resilience to flooding of the new housing.	<p>Account of climate change, increased river flows, and frequency of major flow is taken to the design, location and resilience to flooding of the new housing.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Climate change and flooding concerns as related to the proposed development</li> </ul>	<p>Recommend to accept in part the original and further submissions in so far as climate change has been accounted for during drafting of the plan change.</p> <p>Note that the submitter did not fill out the submission form in the prescribed manner.</p> <p>As outlined under submission point S23.003, the Stormwater Report has taken climate change into account.</p> <p>In addition, Horizons One Plan has specific consent requirements for works within 8m of the inland toe of the stop bank. In response to other direction in the One Plan minimum floor levels are also proposed. Combined these provisions are considered to sufficiently manage the risk of climate change.</p> <p>Changes to the minimum finished floor level provisions are required to take into account climate change which were omitted from the notified provisions.</p> <p>Refer also to comments under submission point S09.004 regarding climate change provisions for future development.</p> <p>Refer also to submission point numbers S16.003, S16.004, S16.005, and S16.006 about discussion concerning natural hazards &amp; storm water.</p>
Rosemary Watson S19.006	General - Fencing	Amend	Concerned that 'adequate (existing) fence' between private and public land under the Fencing Act 1978 may not be regarded as an 'adequate fence' between private residential properties and that Tilbury Avenue property owners should not be expected to contribute to any work required to attain potential new 'adequate' shared boundary fencing standards.	Include provision for recompense agreements and/or fencing covenant clauses under the Fencing Act 1978 and/or other appropriate legislation, with these to apply to adjoining landowners/occupiers from removal of Reserve status through land development changes up to and including first residential homeowners.	<p>Recommend to reject the submission.</p> <p>Issues raised in the submission relate to the Fencing Act 1978, rather than the District Plan provisions. There is no mechanism for the District Plan to address who pays for fencing internally between private property owners.</p>
Rosemary Watson S19.0012	General – Noise	Amend	<ul style="list-style-type: none"> <li>The noise assessment recommends that Residential Zone noise provisions are applied to the RRA but it appears to be weighted towards managing reverse sensitivity of new residential living among existing industry operation as development proceeds.</li> <li>No direct consideration of construction-related noise relief for the existing residential neighbourhood over the proposed long time frame of ongoing site development.</li> </ul>	<p>Amend the provisions to include RRA-wide set of working hours for site development/building activities which generate significant noise.</p> <p><b>Further Submission by Frances Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part.</li> <li>Reasons: The submitter is seeking additional noise standards for construction activities. These are not required because it is standard practice to impose construction noise related consent conditions at the time of subdivision consent.</li> <li>Relief Sought: Disallow the submission point.</li> </ul>	<p>Recommend to reject the submission. Recommend to support the further submission.</p> <p>Construction activities are excluded from the noise provisions in Section 6 in the District Plan. Rule 6.2.6.2(g) states <i>Sounds generated by construction, maintenance and demolition activities, and, additionally, sounds generated by soil conservation and river control works carried out or supervised by the Manawatu-Wanganui Regional Council in the Flood Protection Zone, shall be assessed, predicted, measured, managed and controlled by reference to NZS6803:1999 Acoustics – Construction Noise.</i></p> <p>Mr. Syman completed noise monitoring of the Roxburgh area as outlined in paragraphs 17 to 21 of his evidence. He has concluded that no additional noise standards are required to be included in the District Plan, as a result of PCE. In addition, he considers that existing residents are sufficiently protected from industrial activity noise under Rule 12.8.1(a).</p> <p>No changes to the provisions are recommended.</p>
Rosemary Watson	General – Trees	Amend	Concerns raised regarding existing trees within Waterloo	<ul style="list-style-type: none"> <li>Include suitable recompense agreements for Tilbury Avenue</li> </ul>	Recommend to reject the submission.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
S19.007			<p>Park Reserve and on adjoining Tilbury Avenue properties and the area subject to the proposed plan change, including:</p> <ul style="list-style-type: none"> <li>While trees on adjoining Tilbury Avenue properties are not identified as 'notable trees' and not protected under section 17 of the District Plan they are 'significant trees' within the gardens they are located in and will provide some screening and privacy between existing and future dwellings in the Roxburgh Residential Area.</li> <li>A number of mature trees are scheduled to be felled as part of future development, including trees in Waterloo Park Reserve.</li> <li>Notes that the introduction section under Section 10 of the District Plan states that the design of new housing development needs to limit adverse effects such as the removal of established vegetation and queries where regard to this has been had in the current Plan Change.</li> <li>Notes that Section 17 of the District Plan states "Any further addition or deletion of a tree from the Schedule [of notable trees] will only be considered where a request for a Plan Change has been received", and that no consideration and evaluation of benefits within Waterloo Park Reserve has been done.</li> </ul>	<p>property owners for falling/dead trees on their properties due to unbalancing by trimming tops back to the boundary and/or root damage from site work in the Roxburgh Residential Area.</p> <ul style="list-style-type: none"> <li>Include 'current value' assessments of existing trees and vegetation across the proposed Roxburgh Residential Area, along with other infrastructure assessment.</li> </ul>	<p>Issues raised in the submission relating to falling or dead trees are the property owners responsibility. The Property Law Act 2007 provides the regulatory framework for the maintenance and trimming of trees.</p> <p>As discussed through the prehearing meeting, to develop land within the site, the trees on the existing Waterloo Reserve will most likely be removed as any earthworks will impact the root ball and therefore the stability of the trees.</p> <p>As outlined in Mr Phillips evidence under Section D (S019), a STEM assessment of the trees on the reserve land has been undertaken and while they are good health, they are not suitable for residential areas as the trees within fall distance to dwellings in light of storm events. The report outlines that the trees do not meet the criteria for a notable tree consideration under the District Plan.</p> <p>In relation to notable trees, there are no trees listed as notable in the District Plan in this Roxburgh Residential Area. Section 17 was last reviewed in 2016 and none of the trees in the surrounding area where identified for inclusion in the District Plan.</p> <p>No changes to the District Plan are recommended as a result of this submission.</p>
Rosemary Watson S19.011	Section 32 – Appendix F: Contamination Report – PSI & Appendix G: Contamination Report - DSI	Amend	<p>Site neighbours and adjacent public areas are not considered in either Contamination Report, which is a serious omission.</p> <p>The unusual nature of this industrial area warrants site-wide overview/organisation to ensure overall co-ordination of contamination management activities. There should be higher level of scrutiny to ensure compliance with NES standards.</p>	<p>Include near-neighbours and users of the River Park near the RRA in the conceptual site model and implement contamination management strategies.</p> <p>Local authorities to implement site-wide overseeing of contamination-related issues throughout the RRA construction period.</p>	<p>Recommend to reject the submission.</p> <p>The PSI and DSI assessments identify the land subject to contamination. This information is held on the property files to alert the landowner of the classification. Under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS), remediation work will be required to enable the change in use from industrial to residential. These requirements are all defined in the NES-CS and full outside the District Plan.</p> <p>The NES-CS respects secondary legislation and adequately addresses the issues of site contamination. The advice note under rule 7.6.2.6 is still considered to be appropriate.</p> <p>Refer also to submission number S13.001 for additional comments about contaminated soil.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
Rosemary Watson S19.009	Section 32 Evaluation Report and Section 32 Report - Appendix J: Stormwater Servicing Report	Amend	Ensure the modelling of changes of overall site pervious percentage with development is correct, and the timing of "peak site impermeability" during development is matched by stormwater installations/upgrades.	Investigate discrepancies in Section 32 Evaluation Report, between summary of the Stormwater Assessment consultant report, and the consultant report itself.	Recommend to reject the submission.  Ms. Wood has outlined in paragraphs 124-126 of her Statement of Evidence that:  <i>In terms of the modelling, the current plan change area was considered to be largely impervious for the initial assessment of flow and then this flow was then compared to available pipe capacity. While there is an existing gravel yard on part of the site, at a catchment wide level, this was considered to be largely impervious for the purpose of runoff calculations.</i>  <i>Given that the yard is used for vehicle movements, then the material is likely to be well compacted and could perform more like a sealed surface, particularly in larger events. In addition, the pipe capacity calculations and associated modelling for larger events consider the wider catchment and as such, the results are unlikely to be sensitive to a small change in the curve number used for a portion of the current industrial land.</i>  On that basis, I do not consider that there are discrepancies between the Storm Water Servicing Report and s32 Evaluation Report. No changes are recommended as a result of this submission.
Rosemary Watson S19.010	Section 32 Report – Appendix D: Transportation Assessment	Amend	Ensure safety for pedestrians and cyclists using the accessway(s) between the RRA and Roxburgh Crescent.	Investigate the 'not safe' claim made by their 'major Plan Change development partner' from time between the draft and final Transport Assessment reports.  Council to establish the nature of the safety issue, and whether it was successfully mitigated before the final report.	Recommend to reject the submission.  As discussed elsewhere in my report, this point addresses a matter that is not part of this Plan Change, nor something that I can comment on.  In regards to the safety of pedestrian and cyclist safety refer to submission point number S11.008.  No changes to the District Plan provisions are recommended as a result of this submission.
Sean Monaghan S01.001	Section 7: Objective 11	Oppose	As the city grows the quality of life diminishes as the city becomes noisier, busier and harder to get around and the environment degrades. The city should look at some of the clever and prosperous ways to degrow to improve the quality of life and of the environment.	Investigate ways to degrow to improve the quality of life and of the environment.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full - Submitter stance on District Plan Section 7 Objective 11 which states "...ensure that the subdivision within the Roxburgh Residential Area proceeds...".</li> <li>Reasons: In a world of finite resources I do not consider 'growth' to be the only answer to economic prosperity and community well-being, and I personally do not want to see Palmerston North's "small city benefits" being lost to its "big city ambition". I do not want to live in a "big city" with all its big problems, and I'm all for living within one's means and simplifying life. However, whilst PNCC is mandated by central government to provide housing under the NPSUD, it seems logical to use this anomalous industrial block of land, already surrounded by a residential area, for that purpose, providing that the development is suitably matched to its surroundings and available infrastructure.</li> </ul>	Recommend to reject the original and further submissions.  The key purpose of the plan change is to rezone industrial land for residential use to enable more housing in Palmerston North. The plan change area is close to existing public transport options, and community amenities. The provisions allow smaller section sizes thereby providing choice to residents in the future. This is considered to be a way of reducing the new for additional greenfield land.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
Sophie Boulter S02.001	General – No specific provision referenced	Amend	Whether there was consideration done for the school close to this area that the houses will be in zone for. If 150+ houses are built its likely a significant percentage will have primary aged children. What provisions will be put in to support the school in this situation? What would be the predicted increase in children living in the school zone at any one time. Same applies to intermediate and high school. Could another school be considered in the area?	Amend the plan change to reconsider the impact on school zones.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Support - Entire submission re schooling zoning/considerations.</li> </ul>	Recommend to reject the original and further submission.  Council's Future Development Strategy 2024 included Roxburgh Crescent as part of future residential growth. The FDS outlines that no additional schools will be required in Palmerston North, based off projected population figures.  Council has contacted the Ministry of Education for further comment regarding future development of schools in Palmerston North. No response has been received as of writing the s42A report.
Te Whatu Ora Health New Zealand S13.001	Section 32 – Appendix F: Contamination Report – PSI & Appendix G: Contamination Report - DSI	Support in part	Has an interest in contaminated land on which housing developments are proposed and acknowledges Council's proposal to require land developers to submit a plan that will show an overall development plan and how the site will be remediated.	Consider Te Whatu Ora as an affected party when development and associated site remediation plans are assessed by Council.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Support - Site contamination issues, S32 Contamination reports.</li> </ul>	Recommend to reject the original and further submissions.  The PSI and DSI reports provided as part of the s32 report, have identified 'pieces of land' within the plan change area which have contaminated soil. A note to plan users has been included within Rule 7.6.2.6 to address the matter and highlight that the NES-CS will apply. As the NES-CS is secondary legislation there is no requirement to replicate the provisions in the District Plan. On that basis, no changes to the contents of the 'Note to Plan User's' are recommended.  The submission's issues are more relevant to the NES-CS than the District Plan, which only addresses land disturbance. According to Section 43B of the RMA, the NES-CS takes precedence if it allows for more stringent rules. In this case, the NES-CS takes precedence over the District Plan, which only has rules for land disturbance. Parties considered potential affected are determined through the consenting process. No change is recommended as a result of this submission.
Palmerston North City Council S09.001	Section 10: Rule 10.6.1.8 and Rule 10.6.3.3	Support in part	Concerns regarding the use of copper and zinc roofing, guttering and cladding materials. Notes that these products, when not sealed or otherwise finished to prevent runoff that contains copper and zinc particles, can have an impact on downstream water sources and that Council has a responsibility to ensure that these products are treated to avoid discharge of contaminants to downstream watercourses such as the Manawatū River.	Add a new policy <u>Policy 17.5 The effects on water quality of copper and zinc entering the stormwater system from use as roofing, guttering and building materials are mitigated through the use of appropriate treatment.</u>  <ul style="list-style-type: none"> <li>Add a new performance standard to Rule R10.6.1.8 Dwellings within the Roxburgh Residential Area as follows: m) <u>Where new buildings and structures, or additions and alterations to existing buildings and structures, use copper or zinc cladding and/or roofing materials (including guttering and spouting) these materials are sealed or otherwise finished to prevent water runoff which contains copper or zinc.</u></li> <li>Amend Rule 10.6.3.1 Buildings or structures that do not comply with performance standards for permitted and controlled activities as follows:</li> </ul>	Recommend to accept the submission. Recommend to support the further submission by Horizons and Ms. Watson. Recommend to support in part the further submission by Rangitāne o Manawatu.  To ensure consistency of District Plan provisions, the proposed wording in the provision has been drafted to be consistent with the drafting used in Plan Change I: Increasing housing supply and choice.  Ms. Wood has outlined in her Statement of Evidence that: <i>Where copper and zinc materials are used in exposed surfaces then these contaminants can become entrained in stormwater runoff in dissolved or particulate form. Sealing of the roof and/or guttering surface can avoid the direct contact of runoff with the metal in the first instance and therefore reduce the likelihood of contamination occurring.</i>  If the term 'avoid' was used rather than mitigate would mean that those materials may not be used at all. By using the term 'mitigate' recognises that you can use the material where it has been treated so that there are no effects on the awa. Additionally, consenting pathways are available where copper and zinc building materials are not sealed or otherwise finished, provided a alternative satisfactory treatment method(s) is used.  Recommend to add a new Policy 17.5as follows:  <u>The effects on water quality of copper and zinc entering the stormwater system from use as roofing, guttering and building materials are mitigated through the use of appropriate treatment.</u>  Recommend to add a new Rule 10.6.1.8(m) as follows:



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
				<p><b>Any building or structure which does not comply with the performance standards for Permitted or Controlled Activities in relation to</b></p> <p>...  xviii <u>Copper and zinc building materials in Rule 10.6.1.8 m)</u>  are Restricted Discretionary Activities with regard to:  ...  <ul style="list-style-type: none"> <li><u>How stormwater from copper and zinc building materials will be treated to prevent these contaminants from entering the stormwater network.</u></li> </ul> </p> <p><b>Further Submission by Rangitāne o Manawatū:</b></p> <ul style="list-style-type: none"> <li>Position - Support a new policy but oppose the policy wording.</li> </ul> <p><b>Further Submission by Horizons Regional Council:</b></p> <ul style="list-style-type: none"> <li>Position: Support the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Zn and Cu run-off contamination avoidance.</li> </ul>	<p><u>m) Where new buildings and structures, or additions and alterations to existing buildings and structures, use copper or zinc cladding and/or roofing materials (including guttering and spouting) these materials are sealed or otherwise finished to prevent water runoff which contains copper or zinc.</u></p> <p>Recommend to add a new provision to Rule 10.6.3.1 as follows:  <u>xvii. Copper and zinc building materials in Rule 10.6.1.8 (m)</u>  are Restricted Discretionary Activities with regard to:</p> <ul style="list-style-type: none"> <li><u>How stormwater from copper and zinc building materials will be treated to prevent these contaminants from entering the stormwater network.</u></li> </ul>
Rangitāne o Manawatū S16.006	Rule 7.6.2.6 and Rule 10.6.3.3(vii)	Support in part	<p>Concerned that despite the Stormwater Servicing Report directing that a Stormwater Management Plan is required to address treatment for stormwater runoff and pervious area requirements (see section 3.4), it has not been included in the proposed provisions, specifically R7.6.2.6.</p> <p>Notes that although bullet point 5 in proposed R10.6.3.3 vii Stormwater Design addresses the permeable surfaces requirements it does not address all the specified matters recommended to be included, including stormwater treatment prior to discharge to the primary network, as described in the Stormwater Servicing Report at section 3.4.</p>	<p>Amend R7.6.2.6 and R10.6.3.3(vii) to include a requirement for a Stormwater Design or Management Plan to be prepared, as a performance standard.</p> <p>Amend the Stormwater Design or Management Plan performance standard addresses all of the matters outlined in Section 3.4 of the Stormwater Servicing Assessment.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose - Increase maximum lot size to 600 m2, amend relevant standards accordingly.</li> </ul>	<p>Recommend to reject the original and further submissions.</p> <p>Ms. Wood has discussed provision for stormwater management plans in paragraph 117 of her evidence. She has outlined:</p> <p><i>Stormwater management plans are typically used to provide additional detail on the methodology, approach and expected outcomes for managing stormwater in an area. I consider that connectivity, pervious area assumptions, and the need for treatment are already included in the Plan Change provisions, particularly through the amended provisions identified in Submission 9.002. Similarly, flood impacts are managed through the pervious requirements captured in the Plan Change provisions (particularly Chapter 10). If residential land development cannot meet the performance standards identified in Chapter 10 then a SMP would be required. I do not agree that preparation of a SMP should be required as a performance standard for permitted activities, with the proposed performance standards proposed in the Plan Change.</i></p> <p>On that basis, I consider that the proposed permitted activity provisions in Section 10 and controlled activity provisions in Section 7 have incorporated adequate storm water management provisions.</p> <p>If these stormwater provisions cannot be met, a resource consent would be required then a stormwater management plan may be needed.</p> <p>No changes to the provisions are required.</p>
Rangitāne o Manawatū S16.004	Rules 7.6.2.6(d), 10.6.1.8, 10.6.3.3	Support in part	The Stormwater Servicing Assessment indicates that as the Roxburgh Residential Area is at	<ul style="list-style-type: none"> <li>Amend Section 7 – Subdivision to include the following minimum requirements:</li> </ul>	Recommend to accept in part the original and further submissions.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			the bottom of the catchment of specific stormwater management solutions will need to be implemented. It is noted that some of these required solutions do not appear to be reflected in the proposed provisions.	<ul style="list-style-type: none"> <li>Use of a high-flow bioretention/biofiltration device, using filtration media with a high filtration capacity - the performance standard in R7.6.2.6(d) requires 'stormwater pits', but does not capture these details;</li> <li>Recontouring of the Roxburgh Crescent area must not alter the existing overland flow paths or increase the catchment area discharging overland to Ruahine Street - should be included in R7.6.2.6.</li> <li>The first 5mm of any rain event from the road carriageway and property driveways draining to the road to be treated prior to entering the piped network – the performance standard in R7.6.2.6(d) requires 'treatment of road stormwater', but does not capture these details;</li> <li>Requirement for an erosion and sediment control plan to be submitted, tailored to address the specific requirements necessary to prevent contaminants from contaminated land entering the stormwater network during (and after) preparatory earthworks – Rule R7.6.2.6 should include a requirement that such a plan is prepared and incorporates any recommendations by a suitably qualified and experienced practitioner which are included in a preliminary site investigation or detailed site investigation, as referenced in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.</li> <li>Amend R10.6.1.8 and R10.6.3.3 in Section 10 - Residential to include the following minimum requirements: <ul style="list-style-type: none"> <li>roof leaders to be directly connected to the stormwater network,</li> <li>rooves are to be zinc and heavy metal free.</li> </ul> </li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full - Stormwater run-off provisions.</li> </ul>	<p>In regards to the comment regarding biofiltration devices and the first flush of any rain event, changes are commended to Rule 7.6.2.6(d) as outlined under submission S09.002 above.</p> <p>As outlined in the Stormwater Servicing Report in the s32 evaluation report, there are no existing overland flow paths within the RRA. No change to the plan provisions is recommended in this regard.</p> <p>Given the size of the site, earthworks are likely to trigger consent from Horizons Regional Council and under the NES-CS. Both processes are considered to adequately manage earthwork effects, meaning that no changes are necessary to the Plan Change. Cross referencing to both the One Plan and the NES-CS are already contained within the District Plan.</p> <p>Horizons One Plan details that earthworks must implement erosion and sediment control methods if it is permitted or be undertaken in accordance with an approved erosion and sediment control plan if resource consent is required.</p> <p>In relation to the requested changes to Rules 10.6.1.8 and 10.6.3.3, the Palmerston North City Engineering Standards already address the matters raised by the submitter in relation to the roof leaders being directly connected to the network.</p> <p>As stated under submission point number S09.001, changes are recommended to the Plan to ensure that buildings and structures that use copper or zinc cladding and/or roofing materials (including guttering and spouting) are sealed or otherwise finished to prevent water runoff with contaminants.</p> <p>No additional changes are considered necessary as a result of this submission.</p>
Rangitāne o Manawātū S16.012	Section 10: Objective 16, Rule	Support in part	Considers it is not clear from the s32 Evaluation Report how adverse effects on new residents	Amend Section 10 by inserting a new policy under proposed new objective 16, that addresses the need to manage the	Recommend to reject the submission and further submission.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
	10.6.1.8, Rule 10.6.3.3(j)		<p>in the zone will be managed during the 'gradual transition' from current industrial activities to full residential development.</p> <p>Notes that heavy vehicles will still continue to service the area while industrial activities remain and that the s32 Report seems to erroneously assume these issues will be resolved by re-zoning and applying residential noise standards. Consequently, is concerned that there does not appear to be any requirement in the proposed provisions to consider acoustic insulation in new dwellings to manage what could be a long period of incompatibility, despite this being the advice in the Acoustic Assessment Report.</p>	<p>noise effects from existing and lawfully established industrial activities on new residential dwellings within the plan change area.</p> <p>Amend R10.6.1.8 by inserting a performance standard requiring assessment and consideration of the need for noise mitigation measures within new dwellings.</p> <p>Amend R10.6.3.3(j) by inserting noise effects from existing and lawfully established industrial activities as a matter of discretion.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support – Noise mitigation - suitable additions to site rules etc.</li> </ul>	<p>Based on a site visit I completed on 22/01/2025, the existing businesses within the RRA included:</p> <ul style="list-style-type: none"> <li>Storage and Offices</li> <li>Engineering Workshops</li> <li>Animal Day Care Centre</li> <li>Manufacturing &amp; fabrication</li> <li>Trade Services</li> <li>Business Carparks</li> </ul> <p>As with any redevelopment of an area, there will be a transition period where a mixture of industrial and residential uses will occur. The industrial businesses will be able to operate using existing use rights under s10A RMA, assuming they were legally established.</p> <p>As outlined by Mr Syman in paragraph 31 of his evidence, noise monitoring of the existing activity in the Roxburgh area was undertaken. Mr. Syman has outlined that these businesses tend to not generate adverse noise effects and to operate at acceptable ranges. He considers that these businesses should be able to operate within existing use right perimeters. Mr Syman's recommendation is that no additional provisions are required for noise mitigation measures in dwellings within the RRA.</p> <p>Refer to comments under submission point number S19.012 for additional discussion on noise issues.</p> <p>In terms of the references to heavy vehicles traffic noise is specifically excluded from the District Plan under rule 6.2.6.2.1(d) Refer to additional comments under submission number S06.001 regarding transport trips.</p>
Rangitāne o Manawātū S16.007	Rules 7.6.2.7 and 10.6.3.4.	Support in part	<p>Considers that public or limited notification should not be expressly excluded, unless there is certainty that the provisions will ensure good outcomes are achieved.</p> <p>Contends that as stormwater quality and quantity effects of re-zoning for residential development are not appropriately mitigated by the provisions as currently drafted there should be an opportunity for potential effects to be identified and addressed through notification processes, including consideration of the need to notify Horizons Regional Council and Rangitāne.</p>	<p>Amend R7.6.2.7 and R10.6.4.3 to enable limited notification in cases where the proposed provisions to manage stormwater effects are retained.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support – limited consent notification.</li> <li>Reasons: Notifying appropriate outside parties could provide an additional check that all is good with development activities and improved quality of outcomes. I assume the submitter references R10.6.3.4, not R10.6.4.3, in respect of this (discrepancy noted in summarised point).</li> </ul>	<p>Recommend to reject the original and further submissions.</p> <p>I understand that the submitter is referring to Rule 10.6.3.4 in the proposed provisions, not Rule 10.6.4.3.</p> <p>The purpose of the non-notification clauses is to ensure if development is done in accordance with the provisions and meets the desired outcomes in the Plan notification would not be required.</p> <p>Regarding R10.6.4.3, this rule already applies to other Multi-Unit Residential Developments Brownfield areas in Palmerston North such as the Hokowhitu Lagoon. No specific issues have been raised with the existing approach.</p> <p>If the rule 10.6.4.3 is not met, it would default to a Discretionary Activity and the non-notification clauses in the proposed provisions would not apply.</p>
Frances Holdings Limited S11.006	Rule 7.6.2.6 (c)	Support in part	Although the proposed minimum lot size of 250 m2 and maximum of 500 m2 are generally considered to be appropriate site planning is showing that in a few	Increase the maximum lot size to 600 m2.	Recommend to reject the submission.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			cases a larger section may be necessary.		<p>During the prehearing meetings with Frances Holdings Limited an indicative site plan was shared to demonstrate how the site could potentially be developed. I noted that the proposed lots were all higher than the minimum lot being enabled by this Plan Change.</p> <p>Mr McDonald has reviewed this indicative site plan and notes in paragraph 79 of his evidence that:</p> <p><i>More generally, I note that the submitter's indicative layout results in a much lower yield than that which is possible under PCE. This is unfortunate because – as the RRA's largest landholding – the FHL property offers the best opportunity for intensive development. Elsewhere in the RRA, I estimate that subdivision of existing parcels will result in approximately 35 mostly compact lots. When these are added to the 67 parcels in the submitter's indicative layout, the RRA's total yield is 102 lots i.e., significantly fewer than the 120 lots forecast in my broadbrush intensive development scenario (see paragraph 41).</i></p> <p>The intent of the Plan Change has always been to enable smaller lots to maximise the yield that this site provides Palmerston North and the required housing need, especially in the short term.</p> <p>The FDS outlines that additional housing is needed in Palmerston North City hence lower lot sizes. Should landowners want to seek larger lots, then a Discretionary Activity consent is available as an option.</p> <p>Refer also to comments in S15.001 about the appropriateness of the proposed minimum lot sizes/site areas.</p> <p>Based on the evidence of Mr McDonald, the increase in lot size would see roughly a reduction of potential yield by a third across the site. This is not in keeping with the overall intent of the plan change and therefore I do not recommend any change to the maximum lot size.</p>
Frances Holdings Limited  S11.016	Section 7: Rule 7.6.2.6	Oppose	Considers the R7.6.2.6 second bullet R7.6.2.6 regarding general accordance with the Structure Plan is not a matter of discretion and should be deleted.	<p>Delete bullet point two in Rule 7.6.2.6.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose - Delete clause re subdivision in accordance with the Structure Plan</li> </ul>	<p>Recommend to reject the original submission. Recommend to support the further submission.</p> <p>The submitter clarified during the prehearing meeting on 12/02/2025 that this submission point is referring to Rule 7.6.2.6 performance standard (b).</p> <p>The purpose of Structure Plan is to provide a well-functioning urban environment, which produces high quality private and public realms, with good connectivity and infrastructure. The structure plan provides a logical and connected development pattern similar to other areas in Palmerston North, such as Hokowhitu Lagoon, Aokautere, and Matangi Residential areas. Mr McDonald outlines the evolution of the Structure Plan development in his evidence.</p> <p>Requiring subdivision to be in general accordance with a Structure Plan is standard planning practice throughout New Zealand. There several other references in the subdivision section of the district plan where development plans are required to be general accordance with structure plans. This includes matters of discretion for development in (but not limited to) Napier Road Residential Area, Grand Oaks Drive Residential Area, Midhurst Street Industrial Area.</p> <p>Reference to 'in general accordance' has been well tested in case law and its use here remains appropriate. As outlined in <i>Hood v Dunedin City Council</i> [2017] NZEnvC 42, the 'general accordance' approach permits minor variation to the activity described in the resource consent in and accompanying documents. The case outlined that 'general accordance' does not permit the consent holder to conduct the activity in a materially different way than that described.</p> <p>The reference to the Structure Plan in Rule 7.6.2.6 (b) means that should a landowner seek to develop in a manner that is not in general accordance with the structure plan then a discretionary activity consent is required. As outlined in paragraphs 5.80 – 5.90 of my s42A Report, following the prehearing meetings with the submitter and taking into account Mr. McDonald's and Mr. Groom's evidence, I have further reviewed the objective and policy guidance for those instances where a developer may wish to seek consent that delivers a different layout than what the Structure Plan shows. There are changes to Objective 17 and its policies that could be made to improve the guidance for decision makers in the future. Specifically, these changes are to ensure that the design and layout outcomes contained within</p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p>the structure plan are accurately reflected in the suite of objectives and policies. These amendments to the proposed provisions will provide a clear framework for the assessment of future development proposals including those that are in general accordance with the Structure Plan.</p> <p>Refer also to the comments in submission points S11.008 and S11.012 about the proposed amendments to objective 11 and policies 11.1-11.3.</p> <p>In response to the submission I recommend the following changes to Objective 11 and policies 11.1-11.3 as follows:</p> <p>Recommend to amend Objective 11 as follows:</p> <p><b>Objective 11:</b> <del>To ensure that s</del> Subdivision within the Roxburgh Residential Area <del>proceeds in a manner that:</del></p> <p>(a) Delivers a <u>comprehensively designed and</u> connected residential area <u>which is integrated with the surrounding environment</u> <del>identified in the Structure Plan layout.</del></p> <p>(b) Manages stormwater in an integrated manner by implementing water sensitive design principles.</p> <p>(c) Provides for an increase in housing supply through a variety of housing types and sizes to achieve the efficient use of land and respond to housing needs and demands.</p> <p>(d) Creates a single pedestrian connection with the Manawatū River.</p> <p>Recommend to amend Policy 11.1 as follows:</p> <p><b>Policy 11.1:</b> To ensure that <u>subdivision layout</u> and development is undertaken <del>in an integrated and coordinated manner</del> in general accordance with the Structure p-Plan.</p> <p>Recommend to amend Policy 11.2 as follows:</p> <p><b>Policy 11.2</b> To restrict the use of cul de sacs and ensure connectivity <u>through an accessible internal street layout which forms a block structure to maximise connectivity integrates with the surrounding transport network and provides a pedestrian access and cycleway, as outlined in the structure plan.</u></p> <p>Recommend to amend Policy 11.3 as follows:</p> <p><b>Policy 11.3</b> To recognise the limitations of the existing road corridor by <del>enabling</del> <u>ensuring that road layouts to be consistent are in general accordance with</u> the road cross sections (refer to <b>Map 7.10 A</b> Roding Cross Section).</p> <p>As a result of the recommended changes to the objectives and policies, I do not support changes to this matter of discretion sought in the submission point.</p> <p>On that basis no changes are recommended in response to this submission point.</p>
Palmerston North City Council S09.002	Section 7: Rule 7.6.2.6(d), Map 7.10A, Map 7.10B	Support in part	Rule 7.6.2.6 d)(iii) provides a specific measurement for stormwater treatment, however is not appropriately qualified. Based on the Stormwater Servicing Assessment of the area subject to the proposed plan change, the 1 m <sup>2</sup> of treatment per 270 m <sup>2</sup> of contributing area is based on the use of a Filterra System, which is a rapid stormwater filtration device.	<p>Amend Rule 7.6.2.6(d)(iii) Road corridor as follows:</p> <ul style="list-style-type: none"> <li>How water sensitive design elements have been incorporated to manage stormwater quantity based on one (1) square metre of <u>rapid stormwater biofiltration pit</u> being provided per contributing catchment area of 270m<sup>2</sup>.</li> </ul> <p>Amend reference to the stormwater treatment device on Maps 7.10A and 7.10B as follows:</p>	<p>Recommend to accept the original submission. Recommend to support the further submission by Rangitāne o Manawatu and Ms. Watson. Recommend to oppose the submission by Frances Holdings Ltd.</p> <p>The requested changes provide clarity for plan users on which storm water treatment devices can be used that result in adequate storm water treatment outcomes. This change also ensures consistency between the rules and the roading cross sections and applies a more generic approach for future development to achieve the stormwater quality requirements identified in the plan.</p> <p>Ms. Wood outlines in her evidence in paragraph 54 that:</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			<p>By not appropriately quantifying the need for a rapid stormwater filtration device within the provisions there is potential that alternative treatment devices could be used that are significantly undersized, thereby resulting in poor outcomes and not meeting the intended objectives.</p> <p>Additionally, the cross-sections provided in Maps 7.10A and 7.10B reference a “biofiltration stormwater pit to service 270m<sup>2</sup> road reserve area”. The metric given is specific to a Filterra Tree Pit, or similar rapid stormwater biofiltration device. Consequently, the reference needs to be modified to either include the word “rapid”, or remove “to service 270m<sup>2</sup> road reserve area”.</p>	<ul style="list-style-type: none"> <li><u>Rapid b</u>Biofiltration stormwater pit to service 270m<sup>2</sup> road reserve area.</li> </ul> <p><b>Further Submission by Rangitane o Manawatu:</b></p> <ul style="list-style-type: none"> <li>Position: Support the submission.</li> </ul> <p><b>Further Submission by Francis Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Support the submission regarding Rule 7.6.2.6(d).</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Stormwater treatment in roading design</li> </ul>	<p><i>The proposed amendment to Rule 7.6.2.6 (d)(ii) aligns with the Stormwater Assessment report but the amendment proposed to Maps 7.10A and B may need to be amended further to align with the modified rule (replacing ‘road reserve’ with ‘contributing catchment’). This reflects that driveways / accessways could drain towards the roads and therefore should be considered in sizing. Recommend that the requested change is made, with the change in Maps 7.10A and B to reference contributing catchment.</i></p> <p>As a result of Ms. Woods comments, it is recommended to update Maps 7.10A and B to replace the words ‘road reserve’ with ‘contributing catchment’.</p> <p>Recommend amending Rule 7.6.2.6(d)(ii) as follows:</p> <p><u>How water sensitive design elements have been incorporated to manage stormwater quantity include water sensitive design elements based on one (1) square metre of rapid biofiltration stormwater pit being provided per contributing catchment area of 270m<sup>2</sup>.</u></p> <p>Amend the references in Maps 7.10A and 7.10B as follows:</p> <p><u>Rapid b</u>Biofiltration stormwater pit to service 270m<sup>2</sup> <u>contributing catchment</u> <del>road reserve</del> area</p>
Rangitāne o Manawātū S16.008	<ul style="list-style-type: none"> <li>Section 7 - Policy 11.6, Rule 7.6.2.6(c)</li> <li>Section 10 - Objective 16, Policy 16.2</li> <li>Objective 11 - Policy 11.3, Structure Plan Map 7.10</li> <li>Section 7, Objective 11, Policy 11.2);</li> <li>Structure Plan Map 7.10, Section 10, Rule 10.6.1.8, Rule 10.6.3.3 Height Recession Plane</li> </ul>	Support in part	<p>Considers that Plan Change E should create an urban environment that enables:</p> <ul style="list-style-type: none"> <li>Māori communities to provide for their social, economic, and cultural wellbeing, as well as their health and safety, both now and in the future.</li> <li>A variety of homes that cater to Māori communities' needs, being accessible, resilient, and enabling the expression of cultural traditions and norms.</li> </ul> <p>Notes that Policy 9 of the NPS-UD 2020 requires the Council to involve Rangitāne in preparing Plan Change E, undertake effective consultation, and consider their values and aspirations for urban development. Further states that if Rangitāne wish to be involved in decision-making on consents issued under the plan change provisions, the Council must provide opportunities for this involvement, particularly where these consents could impact sites</p>	<p>Retain the following, subject to any amendments to improve clarity and certainty:</p> <ul style="list-style-type: none"> <li>The requirement to provide a range of housing choices and densities (Section 7, Policy 11.6, Rule 7.6.2.6 (c) Lot size, Section 10 - Objective 16, Policy 16.2);</li> <li>The proposal to exchange Reserve land so that green space can be provided in the centre of the Roxburgh Residential Area, along with improved public access to the river (Objective 11, Policy 11.3, Structure Plan Map 7.10);</li> <li>Re-purposing the Council owned piece of land at 22 Roxburgh Crescent so that it can be used as a road reserve to provide parking, to support public access to the river (Objective 11, Policy 11.3, Structure Plan Map 7.10, Roding cross sections);</li> <li>New road connections to ensure connectivity and avoiding the use of cul de sacs (Section 7, Objective 11, Policy 11.2);</li> <li>Opportunities for multi-unit housing, and higher density along the stop bank and recreational areas, to enable more efficient use of land (Structure Plan Map 7.10, Section 10, Rule 10.6.1.8, Rule 10.6.3.3 (xiv) Height Recession Plane.</li> </ul>	<p>Recommend to accept in part the original submission. Recommend to accept in part the further submission by Ms. Watson.</p> <p>Retain the provisions mentioned in the submission, except where changes are required outlined elsewhere in the s42A report.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			of significance and culturally significant issues.	<b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full - Urban environment considerations.</li> </ul>	
Frances Holdings Limited  S11.021	Section 10: Rule 10.6.5.6	Oppose	Considers that the proposed non-complying rules relating to permeable surfaces are unjustified and should therefore be deleted.	Delete Rule 10.6.5.6.  <b>Further Submission by Rangitāne o Manawātū:</b> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <b>Further Submission by Horizons Regional Council:</b> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose - Delete R10.6.5.6 re Permeable surfaces.</li> <li></li> </ul>	Recommend to reject the submission. Recommend to accept the further submissions by Rangitāne o Manawatu and Horizons. Recommend to accept in part the further submission by Ms. Watson.  As discussed throughout the body of my s42A report and elsewhere in this appendix, requiring permeability standards as a mitigation measure for managing stormwater is a standard practice in district plans across the country and is considered best practice. It is no longer appropriate to solely rely on curb and channel to manage stormwater quality and quantity.  The National Policy Statement on Urban Development (NPS-UD), Horizons' One Plan (RPS-UFD chapter), and the FDS emphasize the need to ensure urban development does not exacerbate storm water issues.  Based on the Stormwater Servicing Report and the evidence of Ms Wood, there are not many solutions that will achieve the outcomes that the permeable surfaces rules will deliver for the Roxburgh Area, given its location at the bottom of the catchment and the desire to maintain as much yield as possible from the site.  I consider that Rule 10.6.5.6 is appropriate as it reinforces what is outlined in Objective 17, Policy 17.2, Policy 17.3, and Rule 10.6.1.8(d) to be inserted into Section 10 – Residential zone.  These provisions are in accordance with the Palmerston North Future Development Strategy (FDS), which outlines that appropriate storm water infrastructure, including permeable surfaces, is required in the Roxburgh plan change area and Palmerston North City itself.  The s32 evaluation report outlined that an increase in stormwater flows is likely to occur from the site changing to residential use. Attenuating water onsite through attenuation is not seen as an option for the site as it is at the bottom of the catchment. Attenuating any flow on site may adversely impact the upstream catchment.  Ms. Wood has identified in her statement of evidence that the overall purpose of the permeability standards, she has outlined in paragraphs 81 – 84 that: <ul style="list-style-type: none"> <li><i>Water sensitive urban design (WSUD) is identified in PNCCs Engineering Code of Practice (5<sup>th</sup> Edition) and a fundamental aspect of this is to reduce runoff volume and flow rates generated in the first instance. There are other options available in terms of WSUD but these options tend to focus on collecting and managing runoff after it has been generated.</i></li> <li><i>The use of specified minimum permeability requirements is necessary to align with modelled runoff and capacity assessments and to provide the ability for some development to occur until wider capacity improvements are in place.</i></li> </ul> The use of the Non-Complying status is intentional as not providing adequately for stormwater and solely relying on traditional curb and channel is no longer appropriate on its own. Getting the provision of stormwater wrong would have implications for future landowners and potentially see more ponding on properties. For the reasons outlined above, no changes to the rule are recommended.
Bridget Holmes  S05.001	Section 10: Rule 10.6.1.8(f) (inferred)	Amend	Supportive of 3 story dwellings if developed by private developers/homeowners. No high density social housing. Social housing close to the river access would create risk for our river	Retain 3 storey high dwellings, only if undertaken by private developers/homeowners.  <b>Further Submission by Rosemary Watson:</b>	Recommend to accept in part the original submission in so far as retaining the 3 storey height for part of the site.  Recommend to reject the further submission.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			users and nearby schools with the mental health and social issues which accompany social housing. Clarify the viewpoint in the high density / 3 story builds and if there is the potential to include social housing.	<ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose - Three storey heights, building density, presence of social housing.</li> <li>Reasons: I had assumed that this proposed development was to be completely private with no 'social housing', but agree with the submitter that the potential for this needs to be clarified, and also support having no high density 'social housing' on the RRA site. However, as per my original submission, I oppose three storey buildings anywhere on the site even if privately owned.</li> </ul>	<p>The District Plan cannot specify who can own or build housing or what they can be used for. Nor can the District Plan direct social housing and property ownership. The District Plan can only manage the built form and location of housing as proposed through this plan change.</p> <p>Refer also to submission point number S03.001 in regards to heights of buildings in the RRA.</p> <p>Refer also to submission point number S15.001 in regards to density of development in the RRA.</p>
Doug Kidd S18.002	Rule 10.6.1.8 (f) (inferred)	Oppose	Notes the current development plan allows for three story, 11m, housing on the river front and that the adjacent river walkway is a high use area giving the impression of a semi-rural park setting. Consequently, has concerns that allowing buildings that can be seen from the foot paths will reduce the feel of the walkway.	<p>Restrict building height to two storeys in the Riverfront Area.</p> <p><b>Further Submission by Francis Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Two-storeys only, not three-storeys, along stopbank side of RRA.</li> </ul>	<p>Recommend to reject the submission. Recommend to reject the further submission by Ms. Watson. Recommend to accept the submission by Frances Holdings Ltd.</p> <p>The proposed provisions allow for a minimum 2 storey dwelling height housing but enabling an option of 3 stories to provide flexibility for future developers within the Riverfront Area.</p> <p>Mr Charnley has prepared some images of what 3 storey development following the proposed District Plan provisions could look like in paragraphs 16 to 22 of his evidence. Refer to appendix I of his Report.</p> <p>Mr. McDonald has used these images produced by Mr. Charnley to assist him with considering the submitters concerns. He outlines in paragraphs 98 - 101 of his evidence the smaller minimum lot size and the 11m height limit is a mechanism for enabling greater residential intensity, such as popular townhouses, along the RRA's interface with the river.</p> <p>It is further noted that requiring 2 storey development in the area shown on the Structure Plan near the stop bank is to ensure the future houses get sufficient light given the height of the stop bank. The 3 storey maximum dwelling height is designed to enable higher density to visually link with the river, as discussed in paragraph 100 of Mr. McDonalds evidence. The Riverfront Area has specifically not been extended to adjoin the existing residential areas to ensure the existing residential zone provisions apply at the boundary of the rezoning site.</p> <p>He further emphasis's that these three-story structures are designed to integrate well with the surroundings, even in areas with one- or two-story dwellings as outlined in paragraphs 98 to 105 in his evidence.</p> <p>In addition, he outlines the increased height is also justified by improved CPTED (Crime Prevention Through Environmental Design) outcomes in paragraphs 107 and 108 in his evidence.</p> <p>Overall based on Mr. McDonald's evidence, I do not recommend changes to provisions.</p>
Doug Kidd S18.001	Rule 10.6.1.8 (f), (g), and (i) (inferred)	Amend	The building plans call for Notes either 1 or 2 story building built on the boundary to Tilbury Avenue and three-story buildings along the river frontage of the development is proposed and is concerned that this will cause shading and privacy effects amongst residents living on the properties adjacent to the Roxburgh Crescent.	<p>Restrict height, maximise building setbacks from property boundaries and eliminate windows with a direct view of existing resident properties on Tilbury Avenue to minimize shading concerns.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Shading, privacy and overlooking concerns.</li> </ul>	<p>Recommend to accept in part the original and further submissions.</p> <p>The proposed provisions along the Tilbury Avenue boundary are the same as the existing Residential Zone. During the prehearing meeting with Ms Watson options to manage this interface were discussed. Mr. McDonald has discussed this issue in paragraphs 132 to 137 of his evidence.</p> <p>The options are to retain the proposed provisions or to have a larger rear boundary setback for the properties along Tilbury Avenue. The recommended changes to increase the setback to 5m from the boundary with a Tilbury Avenue property will provide additional benefits as outlined by Mr McDonald in his evidence.</p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			Highlights that many of the residents purchased the properties preceding the proposed development and have orientated their homes and lifestyles to face the Roxburgh Crescent development and restricting the impact of the development would offset the disappointment of the loss of the reserve and the development of high-density housing.		<p>It is acknowledged that there is an existing Waterloo reserve to the north of existing Tilbury Avenue properties which currently benefit from a buffer from the current industrial activities. By implementing a 5-metre building separation distance setback, it takes into account the unique circumstance where residents have had enjoyment of the area being screened from the industrial area. The recommended standard still allows for a buffer from newer residential development, whilst acknowledging the historical reserve buffer for Tilbury Avenue residents.</p> <p>In addition to Mr. McDonald's comments I consider it inappropriate to require only single storey development in an area that is already surrounded by residential uses that can build as of right to a 2 storey level. Requiring only single storey is not an efficient or effective use of land, particularly given the need for housing in the City. Mr McDonald has tested the HIRB and has concluded in paragraphs 139 - 142 of his evidence that combined HIRB and the 5m setback are an effective way to minimise shading on neighbouring properties and allow for sunlight access.</p> <p>Based on the above, I recommend to include an additional separation distance provision under R10.6.1.8(i)(ii) as outlined below:</p> <p><i>All buildings and accessory buildings must be located 5 metres from the boundary on a lot adjoining Tilbury Avenue.</i></p>
Frances Holdings Limited  S11.007	Rule 10.6.1.8(c)(iii)	Oppose	The number of buildings per lot is unworkable as proposed and needs to be amended to a range of lot sizes within the lot size standard.	<p>Amend rule 10.6.1.8(c)(iii) as follows:</p> <p>a. One dwelling unit on <u>lots of 250 m<sup>2</sup> to 400m<sup>2</sup>.</u></p> <p>b. Two dwelling units <u>on lots of 400 m<sup>2</sup> to 600m<sup>2</sup>.</u></p> <p><b>Further submission by Doug Kidd:</b></p> <ul style="list-style-type: none"> <li>Position: Support the submission point.</li> <li>Reasons: Support the developer having the flexibility to adjust the section size to take into consideration the area to be developed.</li> <li>Relief Sought: Amend rule 10.6.1.8(c)(iii) as follows: a. One dwelling unit on lots of 250 m<sup>2</sup> to 400m<sup>2</sup>. b. Two dwelling units on lots of 400 m<sup>2</sup> to 600m<sup>2</sup>.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Lot size ranges included in relevant standards 10.6.1.8 ciii) a) and b).</li> <li>Reasons: I agree that the current wording seems to cater only for lots of exactly the minimum and maximum permitted size, and that in reality there will be a range of lot sizes between these limits. Incorporating ranges of lot sizes into the rules makes them workable.</li> </ul>	<p>Recommend to accept in part the original and further submissions.</p> <p>There are two issues raised in this submission, the way the rule has been drafted and the upper limit for lot sizes.</p> <p>In relation to how the standard is worded, the wording of R10.6.1.8(c)(iii) could be revised to better align with the rule intent outlined in the s32 evaluation assessment. That is to simplify the provisions to one dwelling up to 250m<sup>2</sup> and two dwellings on lots up to 500m<sup>2</sup>.</p> <p>In terms of the higher maximum lot size, Mr McDonald states in his evidence in paragraphs 70 to 74 that it is difficult to justify increasing the minimum lot size from 500m<sup>2</sup> to 600m<sup>2</sup>. Mr. McDonald is of the opinion that given how the existing Roxburgh Crescent area is laid out it is possible for land within the RRA to meet the 500m<sup>2</sup> limit. He outlines in paragraph 79 that increasing maximum lot sizes to 600m<sup>2</sup> would reduce the amount of yield available in the RRA from 120 to 102. Based off Mr. McDonald's evidence, I consider that the submitters approach would be contrary to the purpose of PCE and the FDS.</p> <p>Refer also to comments in S15.001 whether the minimum lot size/site should be increased from 500m<sup>2</sup> to 600m<sup>2</sup>.</p> <p>No changes to the Rule 10.6.18(c)(iii) are recommended</p> <p>I recommend that the wording of R10.6.1.8(c)(iii) is amended as follows:</p> <p>The number of buildings per lot shall be no more than:</p> <p>a. One dwelling unit <u>on lots up to 250 m<sup>2</sup></u></p> <p>b. Two dwelling units <u>on lots between 251 m<sup>2</sup> to 500m<sup>2</sup>.</u></p>
Frances Holdings Limited  S11.020	Section 10: Rule 10.6.1.8(d)	Oppose	Considers that the permeability standard is redundant and should therefore be deleted.	<p>Delete Rule 10.6.1.8(d).</p> <p><b>Further Submission by Rangitāne o Manawatū:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose the submission point.</li> </ul>	<p>Recommend to reject the submission. Recommend to accept the further submissions by Rangitāne o Manawatu, Ms. Watson, and Horizons.</p> <p>As discussed previously in this Report, the permeability standards are necessary and considered best planning practice. They ensure consistency with the direction in the Clause 3.5(4) of the National Policy Statement for Freshwater Management requires District Council's to <i>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</i></p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
				<b>Further Submission by Horizons Regional Council:</b> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Delete R10.6.1.8(d) Permeable surfaces.</li> </ul>	<p><i>on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.</i></p> <p>Proposed Objective 11, Policies 11.5 &amp; 11.8, and Rule 7.6.2.6(d)(iii) &amp; (iv) within Section 7 – Subdivision provides the framework to ensure storm water effects from development is managed through water sensitive design principles. These provisions above align with RPS-UFD-P8 and NPS-FM which requires development to minimise its contribution to climate change through the use of (but not limited to) water-sensitive design and nature-based solutions).</p> <p>Refer also to the comments under submission point number S11.001, S11.019 and S11.021 about the appropriateness of the onsite permeable surface standards.</p> <p>No changes to Rule 10.6.1.8(d) are recommended as a result of this submission.</p>
Horizons Regional Council  S22.005	Rule 10.6.1.8 – Note to Plan Users	Support in part	Bolster the language of the 'Note to plan users', to align with the One Plan requirements.	<p>Amend the wording of the 'note to plan users' as follows (additions shown as <u>underline</u> and deletions as <del>strike through</del>):</p> <p>"Note to plan users: any excavation or earthworks (<u>including planting of trees and shrubs</u>) or structures (<u>including some fences</u>) on or within 8m of <u>the inland toe of the stopbank or any other structure that is maintained by Manawatū-Whanganui Regional Council for the purposes of flood control</u> <del>may will</del> require consent from Manawatū-Whanganui Regional Council. Plan users are advised to consult with the Manawatū-Whanganui Regional Council for any works on <u>or</u> within 8m of <u>the inland toe of the stopbank</u>."</p> <p>Recommend using accurate references to "Manawatū-Whanganui Regional Council," which should include a macron over the "u" in Manawatū, a hyphen between "Manawatū" and "Whanganui", and an "h" in "Whanganui".</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Amend 10.6.1.8 Note to Plan Users re stopbank to align with One Plan.</li> </ul>	<p>Recommend to accept the original and further submissions.</p> <p>The changes requested provide additional guidance for landowners when considered activities close to the stopbank.</p> <p>The changes were discussed through prehearing meetings and wording of the guidance note agreed (see appendix 19).</p> <p>Refer to submission point S22.002 and S22.005 regarding recommendations about the structure plan and works within 8m of the inland toe of the stop bank.</p> <p>Recommend that the note to plan users underneath Rule 10.6.1.8 is amended as follows:</p> <p style="padding-left: 40px;">Any excavation, <del>or</del> earthworks (<u>including planting of trees and shrubs</u>) or structures (<u>including some fences</u>) on or within 8m of <u>the inland toe of the stopbank or any other structure that is maintained by Manawatū-Whanganui Regional Council for the purposes of flood control</u> <del>may will</del> require consent from Manawatū-Whanganui Regional Council. Plan users are advised to consult with the Manawatū-Whanganui Regional Council for any works on <u>or</u> within 8m of <u>the inland toe of the stopbank</u>.</p>
Jackie Carr  S23.001	Rule 10.6.1.8(f) (inferred)	Support in part	Concerns about number of new homes crammed in & with little thought given to the value of green space & landscaping and would put undue pressure on existing infrastructure.	<p>Reduce the building height limit to 2 storeys.</p> <p><b>Further Submission by Francis Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Two-storey limit, not three (along stopbank, inferred).</li> </ul>	<p>Recommend to reject the submission. Recommend to reject the further submission by Ms. Watson. Recommend to accept the submission by Frances Holdings Ltd.</p> <p>The overall intent of this plan change is to enable a higher level of housing density in a location where there is access to wide areas of open space along the river corridor.</p> <p>Mr Phillips, in his evidence in Section D (S06) considers that there is sufficient open space and park provisions for the rezoning. Refer to submission point number S06.003.</p> <p>Mr. McDonald has outlined in paragraphs 41 to 48 of his evidence, discussions about the open space strategy. He outlines that the proposed density in the proposed provisions is not excessive and the open space strategy is sufficient.</p> <p>The Water and Wastewater Servicing report has outlined there is sufficient water and wastewater capacity available to service the Roxburgh Residential Area.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p>Refer to submission points S11.001 and S11.019 regarding comments for on-site permeability standards, water sensitive design elements, and upgrade to storm water outlet pipe.</p> <p>Refer to submission S18.002 about the provisions for heights of buildings along the Riverfront area.</p> <p>Refer to submission S03.001 about the provisions for heights of elsewhere in the RRA.</p> <p>Refer also to submission S15.001 for additional comments on density.</p> <p>Regarding Transport comments refer to comments under submission point S06.001.</p> <p>Taking into account Mr. Phillips and Mr. McDonald's evidence, no changes to the provisions are recommended.</p>
Linda Bell S20.001	Rule 10.6.1.8(f) (inferred)	Support in part	<p>Concerns that the effect 'barrack' like homes shown on the 'artist's impression' would dominate the eastern horizon.</p> <p>3 storey homes would dominate the whole of the Roxburgh Residential Area. When seen from the western river walk below these solid blocks would have zero fit with the neighbouring area.</p> <p>The effects of two storey homes have much less impact and eyesore using the river walkway.</p>	<p>Amend the provisions for buildings to be 2 stories.</p> <p><b>Further Submission by Francis Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Two-storeys only, not three-storeys, along stopbank side of RRA.</li> </ul>	<p>Recommend to reject the submission. Recommend to reject the submission by Ms. Watson.</p> <p>Recommend to accept the submission by Frances Holdings Ltd.</p> <p>Refer to submission S18.002 about the provisions for heights of buildings along the Riverfront area.</p> <p>Refer to submission S03.001 about the provisions for heights of elsewhere in the RRA.</p>
Luke Hiscox S03.001	Section 10: Rule 10.6.1.8(f) (inferred)	Support	<p>Supports residential use, but increase the height limits as high as possible.</p> <p>Housing is needed in Palmerston North, it's an appropriate place for higher buildings, and the rationale to lower some of them doesn't stand up.</p>	<p>3 stories across the whole area.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose - Three storey heights across the whole area.</li> </ul>	<p>Recommend to accept in part the submission. Recommend to reject the submission by Ms. Watson.</p> <p>Three (3) storey development was considered as part of the plan change drafting process. Following community feedback, including from nearby landowners, the 3 storey requirement was restricted to just in front of the stop bank, while the rest of the site would be the same as the existing Residential Zone and enable 2 storey houses as a permitted activity. If a landowner wishes to build higher than a resource consent application would be required.</p> <p>Mr. McDonald has outlined in his evidence in paragraphs 83 to 89 the building height strategy for the RRA. He outlines that if the building height of 9m was to increase, it does not necessary facilitate additional dwelling units. The proposed 9m building height limit recognises that the RRA has an extensive interface with existing residential areas, whilst still enabling an appropriate amount of dwellings consistent with the outcomes sought in PCE. Therefore, enforcing a 9m maximum height limit is appropriate, and aligns with other dwelling building heights standards in the Residential zone.</p> <p>In paragraphs 96 – 106, he further outlines that within the Riverfront area the 11m height limit encourages developers to build up rather than out, and is not located adjacent to existing residential property owners. The height limit enables an efficient 'townhouse' format that engages with the river corridor.</p> <p>It is further noted that if persons wish to construct a 3 storey dwelling outside of the Riverfront area, a Restricted Discretionary Resource Consent application can be applied for.</p> <p>Refer to additional comments regarding heights along the Riverfront Area are under submission point number S18.003.</p> <p>Overall based on Mr. Donald's evidence, no changes to the provisions are recommended.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
Palmerston North City Council  S09.004	Section 10: Rule 10.6.1.8(b)	Support in part	<p>The minimum floor level requirement in the Performance Standard needs to be adjusted as:</p> <ul style="list-style-type: none"> <li>The area is protected by Horizons stop banks from a 0.5% AEP flood event.</li> <li>The minimum floor level should align with the wider residential area, based on a 2% AEP (1 in 50-year flood event) with appropriate freeboard, noting that this aligns with Building Act requirements and is consistent with Horizons One Plan policy HAZ-NH-P10.5.</li> <li>A 2% AEP standard with reasonable freeboard is already generally applied by Council within the city.</li> <li>Provision for climate change should also be included in the performance standard, something that was inadvertently omitted in the notified version.</li> </ul>	<p>Amend performance standard R10.6.1.8(b) as follows: Floor levels must be above the flood and stormwater inundation level predicted for a 0.5%2% annual exceedance probability (AEP) (1 in 200 50-year) flood event (including allowance for climate change), plus 350mm <u>reasonable</u> freeboard for dwellings and dwelling units (including attached garages).</p> <p><b>Further Submission by Rangitane o Manawatu:</b></p> <ul style="list-style-type: none"> <li>Position: <u>Oppose</u> the part of Palmerston North City Council's submission seeking amendments to minimum floor levels and the annual exceedance probability flood event in performance standard 10.6.1.8(b). <u>Support</u> amendments to performance standard 10.6.1.8(b) to include 'allowance for climate change' in the performance standard text.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Flood level rule change.</li> </ul>	<p>Recommend to accept the submission. Recommend to accept in part the submission by Rangitane o Manawatu and Ms. Watson.</p> <p>The intent of the suggested changes was to recognise that there is no anticipated river flooding of the site due to the existence of the stopbank. While there will remain a residual risk of stopbank failure, the requirement for a floor level for riverine flooding is unnecessary when stormwater is the key issue. The changes reflect what is needed for stormwater management.</p> <p>The changes to the minimum finished floor level provisions give provision for climate change which was omitted from the original provisions, and is in keeping with other floor level provisions outlined elsewhere in the Council's District Plan.</p> <p>Recommend to amend performance standard R10.6.1.8(b) as follows:</p> <ul style="list-style-type: none"> <li>Floor levels must be above the flood and stormwater inundation level predicted for a 0.5%2% annual exceedance probability (AEP) (1 in 200 50-year) flood event (including allowance for climate change), plus 350mm <u>reasonable</u> freeboard for dwellings and dwelling units (including attached garages).</li> </ul>
Palmerston North City Council  S09.005	Section 10: Rule 10.6.1.8(d)	Support in part	<p>The Guidance Note under Rule 10.6.1.8 (d) refers to the lack of detention areas being the reason for the permeability requirement. However, the Stormwater Servicing Assessment notes that the permeability requirement stems from the network capacity and the sites location within the wider catchment. Concerns that detention is not an acceptable mitigation measure for this development area. Additional clarity is required to reinforce that detention is not a feasible option to achieve the onsite permeability.</p>	<p>Amend the guidance note to as follows:</p> <ul style="list-style-type: none"> <li>Guidance Note: Given the Roxburgh Residential Area is at the bottom of the stormwater catchment, the lack of detention areas to attenuate stormwater within the site in a location near the outlet to the river, and the current size of the outlet, <u>detention is not a feasible option to achieve the</u> there are few alternatives to providing the onsite permeability required. Council may impose consent notices on property titles at subdivision stage to enforce this standard.</li> </ul> <p><b>Further Submission by Rangitane o Manawatu:</b></p> <ul style="list-style-type: none"> <li>Position: Support the submission.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose – Amend R10.6.1.8(d) Permeable surfaces Guidance note.</li> </ul>	<p>Recommend to accept the original and further submissions by Rangitane o Manawatu and Ms. Watson.</p> <p>Refer to submission points S11.001, S11.019 about the requirements for the permeable surface standards and detention requirements.</p> <p>The addition of the sentence requested provides greater certainty for plan users about the permeability requirements.</p> <p>The additional sentence in the guidance note provides direction as to the acceptable onsite permeability requirements under Rule 10.6.1.8(d). The recommended additional also provides consistency and clear linkages from Objective 17 and Policy 17.3 to Rule 10.6.1.8(d).</p> <p>Recommend to amend the guidance note under Rule 10.6.1.8(d) as follows:</p> <p>Guidance Note: Given the Roxburgh Residential Area is at the bottom of the stormwater catchment, the lack of detention areas to attenuate stormwater within the site in a location near the outlet to the river, and the current size of the outlet, <u>detention is not a feasible option to achieve the</u> <del>there are few alternatives to providing the</del> onsite permeability required. Council may impose consent notices on property titles at subdivision stage to enforce this standard.</p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
Rebecca Hambleton S21.001	Rule 10.6.1.8(f) (inferred)	Support in part	Concerns that 9 metre high homes backing onto current housing will encroach of privacy and sunlight into current homes.	<p>Amend the provisions to be single story homes, except along stop bank, and increase section size.</p> <p><b>Further Submission by Francis Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Mostly support - Privacy and sunlight concerns, increased section sizes, single-storey limit except for stopbank.</li> </ul>	<p>Recommend to reject the submission. Recommend to accept the further submission by Frances Holdings Ltd. Recommend to accept in part the further submission by Ms. Watson.</p> <p>Mr. McDonald has outlined in his evidence in paragraphs 90-95 that the proposed 11m height limit for riverfront properties in the RRA aims to enable compact, three-story dwellings, facilitating the popular townhouse format. Taking into account the smaller minimum lot size and HIRB controls, the 11m height limit is a mechanism for enabling greater residential intensity along the RRA's interface with the river.</p> <p>Refer also to the discussion on heights of buildings in Riverfront Area under submission point number S18.002.</p> <p>Refer also to the discussion on lot sizes and density under submission point number S15.001.</p> <p>As outlined elsewhere in this report, the existing Residential Zone enables two storey houses as a permitted activity. There is no reason to be more stringent in this area and only allow single storey homes to be built.</p> <p>I do not recommend any changes to provisions as a result of this submission.</p>
Rosemary Watson S19.003	Rule 10.6.1.8 (c)(iii), (f), and (g)(i)(b) (inferred)	Amend	<p>Concerned with the proposed height recession planes on the Tilbury Avenue boundary, and consequent shading, overlooking and privacy issues, noting:</p> <ul style="list-style-type: none"> <li>Shading at winter solstice as shown in the PNCC modelling may not be as extensive as predicted at 27 Tilbury Avenue for either single- or 2-storey buildings but will affect the indoor living spaces along Tilbury Avenue properties, where the dwellings are located closer to the boundary.</li> <li>Shading is an issue at 27 Tilbury Avenue, as mature trees to the south of the current vegetable area in the section prevent any suitable relocation.</li> <li>Overlooking would affect Tilbury Avenue properties if 2-storey buildings are permitted and have eye-level window(s) to the south. It would also affect outdoor amenity areas to their north, as well as inside living areas, and lead to some loss of privacy from 'overhearing' due to closeness to the boundary.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that the written description of the height recession plane diagram more accurately reflects the compound angles at the rear of diagram (Rule 10.6.1.8(g)(i)b) vs. exception b., in relation to Fig.1 HRP for the RRA);</li> <li>Consider adding an extra Figure for Tilbury/Ruahine boundary sections.</li> <li>Limit buildings adjacent to Tilbury Avenue boundaries to single-storey; <ul style="list-style-type: none"> <li>and/or allow clerestory windows only on south-facing walls of those buildings;</li> <li>and/or increase lot sizes (widths) from minimum 250m<sup>2</sup> in that area;</li> <li>and/or coordinate design across the row of lots to avoid blocky 'terrace-like' construction.</li> </ul> </li> </ul> <p><b>Further Submission by Frances Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part.</li> </ul>	<p>Recommend to accept in part submission. Recommend to reject the further submission by Frances Holdings Ltd.</p> <p>Council Officer's provided shade diagrams to Ms. Watson during the submission process and are contained in Appendix 17. The shading diagrams took into account permitted activity dwellings and the potential shading effects that would arise. The purpose of the shading diagrams was to show Ms. Watson what the shading effects may be during winter solstice on her property at Tilbury Avenue. During the prehearing meeting Ms. Watson raised concerns about shading on garden, reduced privacy as shown on the shading diagrams.</p> <p>Mr. McDonald has discussed the issue regarding managing residential dwelling interfaces with existing Tilbury Avenue properties in paragraphs 126 to 136 of his evidence.</p> <p>The options are to retain the proposed provisions or to have a larger rear boundary setback for the properties along Tilbury Avenue. The recommended changes to increase the setback to 5m from the boundary with a Tilbury Avenue property will provide additional benefits as outlined by Mr. McDonald.</p> <p>It is further acknowledged that there is an existing Waterloo reserve to the north of existing Tilbury Avenue properties which currently benefit from a buffer from the current industrial activities. Mr. McDonald's discusses in paragraphs 137 – 142 of his evidence options for implementing a new separation distance standard with existing Tilbury Avenue properties. By implementing a 5-metre building separation distance setback, it takes into account the unique circumstance where residents have had enjoyment of the area being screened from the industrial area. The standard still allows for a buffer from newer residential development, whilst acknowledging the historical reserve buffer for Tilbury Avenue residents.</p> <p>Based on the above, I recommend an additional separation distance provision under R10.6.1.8(i)(ii) as outlined below:</p> <p><u>All buildings and accessory buildings must be located 5 metres from the boundary on a lot adjoining Tilbury Avenue.</u></p> <p>Refer to the comments under S18.001 regarding comments about buildings in proximity to Tilbury Avenue properties.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			Single-storey and 2-storey options would add oppressive physical mass to northern views from Tilbury Avenue properties, while the bulk of single-storey buildings as close as 1.5 m from the boundary would be intrusive if narrow section widths are applied.		
Rosemary Watson S19.008	Rule 10.6.1.8 (f) (inferred)	Amend	<p>Concerns raised regarding proposed riverfront building height limits, including:</p> <ul style="list-style-type: none"> <li>Three-storey buildings will dominate and overwhelm that section of the River Park they overlook. The purchase of Horizons land to the east of the Roxburgh Crescent site, will bring the proposed Roxburgh Residential Area and the buildings on it closer to the stop bank than currently.</li> <li>The bulk of a row of tall narrow box-like buildings 'standing over' the area would detract, more than the current industrial zone does, and impact more on the open space natural character.</li> <li>Although the s32 Report (p.132) outlines that "the utilitarian scene [of the current industrial area, viewed from the stopbank] contrasts jarringly with the expansive green landscape of the river corridor" a similar result from the proposed residential building bulk is also queried.</li> <li>Three-storey buildings are not needed to "help define the edge of a large open space" (p.50), as the stop bank itself does that perfectly well.</li> <li>Some of the justification for 3-storey buildings</li> </ul>	<p>Amend the height performance standards to limit building height to a 2-storey, 9 metre maximum.</p> <p><b>Further Submission by Frances Holdings Limited:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose in part.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Support - Reduction of riverfront building height limits.</li> </ul>	<p>Recommend to reject the submission. Recommend to accept the further submission by Frances Holdings Ltd. Recommend to reject the further submission by Ms. Watson.</p> <p>The proposed 2-3 storey height limits near the stop bank ensure sufficient light for future houses and provide flexibility for landowners, as discussed by Mr. McDonald in paragraphs 102 to 116. He emphasizes that the 11m height limit for riverfront properties promotes compact, three-story dwellings, enhancing urban design, safety, and maximizing riverfront potential</p> <p>Refer also to the comments under S18.002 regarding heights of buildings along the Riverfront Area.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			relates to views over the River Park area, and a sense of custodianship over that land by riverfront homeowners. As the stop bank height highlighted in the s32 Report (p.433) is only 2.5 m, it is noted that a 2-storey buildings (max. 9 m) would still allow those benefits for those in the riverfront dwellings, whilst providing the desired 'passive surveillance' over the park and users.		
Rowan Bell S17.001	Rule 10.6.1.8 (f) (inferred)	Support in part	Contrary to the plan change information provided that the proposed guidelines will help ensure the new area fits in well with the surrounding neighbourhood, is concerned that 3 storey housing overlooking the river walkway will be an eyesore and monopolise the landscape, losing its ambience and tranquillity.	Amend the proposed 3 storey height along the stop bank with 2 storeys.  <b>Further Submission by Francis Holdings Limited:</b> <ul style="list-style-type: none"><li>Position: Oppose in part the submission point.</li></ul> <b>Further Submission by Doug Kidd:</b> <ul style="list-style-type: none"><li>Position: Support the submission point.</li></ul> <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"><li>Position: Support - Two-storeys only, not three-storeys, along stopbank side of RRA.</li></ul>	Recommend to reject the submission. Recommend to reject the further submissions by Mr. Kidd and Ms. Watson. Recommend to accept the submission by Frances Holdings Ltd.  As discussed earlier in the Report, Mr. McDonald in his evidence in paragraphs 96 to 116 has commented on the impact of the proposed 3 storey permitted height limit along the stop bank area.  Refer to additional comments under S18.002 about the heights in the Riverfront Area.
Frances Holdings Limited S11.022	Section 10: Rule 10.7.4.12	Support in part	Suggests amending the regime for non-residential activities to reflect proposed Policy 15.5, with this based on a restricted discretionary consent where it is in the locations identified by an improved Policy 16.3 and discretionary consent elsewhere.	Amend the regime for non-residential activities to reflect Policy 15.5.	Recommend to reject the submission.  Please note the submitter confirmed during the first prehearing meeting that the submission point is about Policy 16.3, not 15.5.  During the pre-hearing meeting with the submitter, Mr. Thomas queried whether the use of the word 'and' in Policy 16.3 should have been 'or'. Upon further research post prehearing meeting, I consider the drafting of policy wording is correct. The purpose of the policy was to provide non-residential activities where it can meet both being located on the Ground floor and residential living is above, and in the East – West road opposite or adjacent to the open space area.  The overall policy framework of the plan change has been written in a manner to enable residential development not commercial development. The plan change area has been identified in the FDS as an area to be re-zoned for residential purposes. By non-residential development being a discretionary activity, it signals that a non-residential activity is not the primary intended activity within the plan change area. The change requested by the submitter would be more enabling for non-residential development and that is not appropriate given the overall purpose of the Plan Change.  No changes are recommended as a result of this submission.
Doug Kidd	Map 7.10 Structure Plan (inferred)	Oppose	Notes that residents in the area bought their properties because	Retain Waterloo Reserve as it currently exists.	Recommend to reject the original and further submissions.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
S18.004			of the reserve and a significant portion of local residents supported retaining the reserve as part of the neighbourhood identity.	<b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Support - Retain Waterloo Park reserve buffer strip in current location.</li> </ul>	<p>As outlined in the Parks and Reserves Report and subsequent Statement of Evidence by Mr Phillips, a separate process has been undertaken in accordance with requirements with the Local Government Act and Reserves Act to relocate part of the Waterloo Park to a new central location within the Roxburgh Residential Area.</p> <p>As required by the Reserves Act, Department of Conservation decision has approved the exchange land, subject to the following conditions:</p> <ol style="list-style-type: none"> <li>That the Council approve a district plan change which changes the zoning of the Exchange Land to residential; and</li> <li>That the Land Regulatory Delivery Manager, Department of Conservation, approve the survey plan defining the Exchange Land. Acknowledging that minor amendments may be required, the plan shall substantially reflect the layout provided with the application; and</li> <li>That the survey plan gets approved by Land Information New Zealand.</li> </ol> <p>This plan change was notified after the land exchange was approved by the Department of Conservation. The Hearing Panel have no ability to change the outcome of that process. The only scope the Panel have is the matters of the changes proposed to be included in the District Plan.</p>
Frances Holdings Limited  S11.002	Map 7.10 A & B: Roding Cross Sections	Support in part	<p>Concerns expressed about the following:</p> <ul style="list-style-type: none"> <li>The ability of the 13m wide road to function properly within the residential development, noting that the existing width of Roxburgh Crescent is 12.80m.</li> <li>Lack of detail regarding location of supporting infrastructure in the roading corridor.</li> <li>The function of the road cross section for vehicles.</li> <li>The need for the number of car parks shown the 20.5m wide cross section, noting that the Transport Assessment does not include any assessment of the number of carparks needed to satisfy any visitors to the reserve and any residential overspill parking.</li> </ul>	<p>Amend the Roding Cross Sections to be redrawn to be 12.80 width.</p> <p>Amend the cross sections to show where the 2 Power &amp; 2 Telecom ducts, 2 Gas mains, 2 watermain, Sewer (pressure or gravity), Stormwater, 2 subgrade drains, street trees, biofiltration and the street lighting will fit within the 12.80m wide corridor.</p> <p>Either provide a plan view showing the tracking curves of vehicles entering and exiting a 10m wide lot, how large vehicles will manoeuvre around the 90° bends, and any no parking lines; or revise the 12.8m cross section accordingly.</p> <p>Amend the Roding Cross Sections section to show parallel rather than perpendicular carparks.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose - Roding cross sections - Map 7.10 B parking on middle road.</li> </ul>	<p>Recommend to accept in part the original and further submissions.</p> <p>The issues with the road corridor have been discussed through the prehearing meetings with the submitter. The specific matters of contention have been in relation to detailed design phases at subdivision, rather than the provisions in the District Plan itself. Given the existing narrow road of Roxburgh Crescent, Council has acknowledged, through the use of the road cross sections, that a departure from the Councils engineering standards would be required.</p> <p>Mr. Stuart Cartwright, Council's Chief Engineer, has outlined in a memorandum that services can be located underneath the footpath/carriageway, with a road width of 13 metres. It is noted that it is a compromise on the existing situation as it is a unique brownfield site, with an existing undersized road corridor width. Council officers are open to working with the developer for the unique road corridor design during the development phase.</p> <p>Mr. Groom has outlined in his Statement of Evidence that the existing Roxburgh Crescent road corridor does vary in width throughout. The existing street network within Roxburgh Crescent has a width of 12.8m to 14.0m depending on the point of measurement. 549 Ruahine Street to 9 Roxburgh Crescent is 13.0m wide, 9 Roxburgh Crescent to 33A Roxburgh Crescent is 12.8m wide and 33A Roxburgh Crescent to 521 Ruahine Street is 14.0m wide.</p> <p>The original roading cross sections were introduced to demonstrate how development can occur within existing roading corridor, while still delivering adequate stormwater management elements required. However, upon discussions with the submitter during the prehearing meeting the ability to allow developers to construct a residential road to be more than 13m in width, if desired was sought. Council agreed to amending provisions to provide developers flexibility in the event they wish to construct a wider road, and this can be achieved by adding the words 'minimum' to the cross section.</p> <p>Mr. Groom has outlined in his evidence in paragraphs 38 to 40 that the 13-metre width would still allow for the expected transport outcomes during subdivision.</p> <p>Therefore, I recommend amending the Road Corridor Map 7.10 A Cross Section to outline that the road corridor must be a minimum of 13 metres in width.</p> <p>Storm water solutions can still work but adaptability required during subdivision stage. Council's Infrastructure Unit has agreed to work with future developers to ensure that adequate storm water solutions can be met. Mr. Cartwright has outlined that site-specific engineering solutions can be undertaken at the subdivision stage.</p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p>In addition, Ms. Wood recommends wording is amended on the road cross-section where it states '<u>Rapid</u> biofiltration stormwater pit to service 270m2 <u>contributing catchment road-reserve area</u>' to account for driveways and accessways that could drain towards the road. In addition, the recommendation further aligns with the terminology used in the Stormwater Servicing report and submission point S9.002.</p> <p>Based on the advice of Ms. Wood and Mr. Cartwright, I recommend changes to the provisions are as follows:</p> <ul style="list-style-type: none"> <li>Amend the wording under Map 7.10A to state '<u>minimum</u> 13m'.</li> <li>Amend the wording under Map 7.10B to state '<u>Rapid biofiltration</u> stormwater pit to service 270m2 <u>of contributing catchment road-reserve area</u>'.</li> </ul>
Frances Holdings Limited  S11.010	Map 7.10: Structure Plan	Support in part	The Council has approval from the Department of Conservation that the proposed Roxburgh Crescent reserve is exchanged for an existing reserve located west of Tilbury Avenue. Although supported in principle it is noted that this cannot be confirmed until the land exchange has been executed.	<p>Execute the land exchange before the plan change is approved.</p> <p><b>Further Submission by Doug Kidd:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose - Exchange of reserve land prior to Plan Change approval.</li> </ul>	<p>Recommend to reject the original and further submissions.</p> <p>The reserve exchange won't occur unless the plan change is approved and adopted by the council.</p> <p>Refer to the comments under submission point number S18.004.</p>
Frances Holdings Limited  S11.008	Section 7: Policy 11.2 and Map 7.10 Structure Plan	Support in part	The proposed Structure Plan is considered overly prescriptive and gives no room for future flexibility. As it dictates the width of each road, the internal cross section of each road and the overall roading pattern it essentially defines all the parameters of any subdivision other than the dimensions of the sections.	<ul style="list-style-type: none"> <li>Delete the proposed pedestrian and cycle access to Ruahine Street</li> <li>Delete the on street right angle parking on the Road D cross section and replace with parallel parking.</li> <li>Enable the use of Right of Ways or cul-de-sacs if better outcomes are achieved.</li> <li>Enable the Structure Plan to be easily amended.</li> <li>Relocate the existing stormwater pipe in the no build area, as shown on the structure plan, to the centre road.</li> <li>Consequently amend Policy 11.2 by adding the following: <u>"unless a better design outcome is achieved."</u></li> </ul> <p><b>Further Submission by Doug Kidd:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose the submission point.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full – Degree of overall structure plan flexibility.</li> <li>Position: Neither support in full nor oppose in full – Delete proposed pedestrian/cycle access, and Delete right angle parking on centre road D.</li> </ul>	<p>Recommend to accept in part the submission. Recommend to support in part the further submissions by Mr. Kidd and Ms. Watson.</p> <p>The intent of the structure plan is to highlight key components necessary to deliver a high-quality urban environment. The structure plan proposed is considered to be most optimal design outcome for the RRA, as outlined in paragraphs 5.63 and 5.64 in the s42A report. As outlined in the paragraphs 5.80 to 5.83 of my s42A report, the provisions require development to be in general accordance with the development. Case law is clear on what this means as outlined in submission S11.016.</p> <p>Additional comments regarding the Structure Plan and master planning process can be found under submission point number S15.001.</p> <p>Following the prehearing meetings with the submitter, revised provisions about structure plan requirements were provided to council. This included an indicative site plan.</p> <p>Mr. McDonald outlines in paragraph 80 of his evidence that whilst he notes the indicative site plan may be an option, it is not in accordance with the overall outcomes of the structure plan in particular as it deviates from the minimum and maximum lot sizes.</p> <p>In response to the submitter requesting the deletion of pedestrian &amp; cycle routes, street right angle parking, and enabling right of ways or cul-de-sac's, Mr. Groom considers that these are necessary as outlined under paragraph 34 of his evidence.</p> <p>The submitter did request that Policy 11.2 is amended to state <u>"unless a better design outcome is achieved."</u> No evidence has been provided outlining what better design outcomes look like by the submitter.</p> <p>However, following the prehearing meetings I have further considered the suite of policies which would in particular guide decision makers for development where departure from the Structure Plan is sought. As outlined in my s42A report in paragraphs 5.84 to 5.90, I have recommended changes to improve the wording, guidance and overall direction for greater clarity for plan users. These changes are made in response to Mr. Groom's and Mr. McDonald's evidence which reflect the need for a compressively designed and connected residential area within the RRA, to be incorporated into the provisions. As outlined in paragraph</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
				<ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full – Enable RoWs and cul-de-sacs if better outcomes are achieved, amend Policy 11.2 accordingly.</li> <li>Position: Oppose – Relocate stormwater outlet pipe to centre road.</li> </ul>	<p>5.88, amendments to Policy 11.2 have been recommended to provide further clarity to plan users the specific connectivity sought which are contained in the structure plan.</p> <p>Refer also to the discussions in submission points S11.012 and S11.016 about the changes to wording of objective 11 and policies 11.1-11.3.</p> <p>Ms. Veni Demado, Council's Activities Manager for Stormwater, has provided a memorandum to Council Officer's regarding the location of the storm water pipe, as outlined in the Structure Plan. She has stated that:</p> <p><i>The existing pipeline of DN675/750 through Roxburgh Cres to the outfall will remain in place. Budgets have not been allocated in the LTP to relocate the existing pipe. A new DN900 pipe will be installed in parallel to the old alignment to provide for additional capacity. An easement will need to be created over the existing and the new pipe alignment as part of a future subdivision resource consent.</i></p> <p>I also note that the discharge infrastructure is all based on the current pipe alignment and changes to that would be expensive and unnecessary. Therefore, retaining the existing stormwater pipe on the structure plan is appropriate.</p> <p>Recommend to amend Policy 11.2 as follows:</p> <p><b>Policy 11.2</b> To restrict the use of cul de sacs and ensure connectivity <u>through an accessible internal street layout which forms a block structure to maximise connectivity integrates with the surrounding transport network and provides a pedestrian access and cycleway, as outlined in the structure plan.</u></p> <p>Based off Mr. McDonald's, Ms. Demado's, and Mr. Groom's evidence, I do not recommend changes to the structure plan and Policy 11.2, sought by the submission point.</p>
Grant Higgins S15.001	Map 7.10: Roxburgh Crescent Structure Plan (and potential to be R7.6.2.6 (c) and R10.6.1.8(c)(iii) inferred)	Support in part	Notes that flexibility in structure planning is important and that change may be required to make a development fit. Also considers that less intensive development in the area will help to mitigate stormwater and traffic effects.	<p>Amend the structure plan to allow flexibility and increase the minimum lot size to 350m<sup>2</sup>.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full - Flexibility of structure plan and increase in minimum lot size.</li> </ul>	<p>Recommend to reject the submission. Recommend to accept in part the further submission.</p> <p>As outlined above, the Structure plan has been developed after an extensive Master Planning Exercise over 5+ years. The Structure Plan shows the key connectivity points and the reserve location necessary for future development. This plan change has been developed on the basis of providing for higher density options in the City as outlined in the Future Development Strategy 2024. There are other areas within the city that already enable larger lots. The structure plan alongside the new provisions, including changes recommended through submissions, will create a well-functioning urban environment as required by the National Planning Standards for Urban Development 2020.</p> <p>Refer to submission point number S11.008 regarding the transport outcomes intended as a result of structure plan.</p> <p>Refer to comments under submission point S11.002 about the 13m wide road corridor prescribed in the structure plan.</p> <p>Refer to submission S06.001 about transport trip generations predicted as a result of PCE.</p> <p>During the prehearing meeting with Frances Holdings Ltd, an indicative site layout plan was provided by the submitter. I have discussed this in the body of my s42A report in paragraphs 5.61 to 5.79 and refer the Panel to that discussion.</p> <p>Overall, I consider that the structure plan provides for optimal road layout, a logical development pattern similar to other areas of Palmerston North. This includes a reserve area with clear connection to the Manawatū River is proposed.</p> <p>Taking into account Mr. McDonald's evidence, I do not consider that any changes are required to the provisions as a result of the submission.</p>
Horizons Regional Council	Section 7: Map 7.10 Structure Plan	Support in part	Discourages any works within the designated stop bank zone, to minimise potential adverse effects	Amend the structure plan to include the stop bank and 8m inland buffer from landward toe of the stop bank, as a 'stop	Recommend to accept the submission in part. Recommend to accept the further submissions by Rangitāne o Manawatu and Ms. Watson.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
S22.002			<p>on the stop bank's structural and functional integrity.</p> <p>Notes that a minimum clearance of 5m from the toe of the stop bank is required to facilitate site maintenance and repair activities.</p>	<p>bank restricted area' (or words to that effect).</p> <p><b>Further Submission by Rangitāne o Manawatū:</b></p> <ul style="list-style-type: none"> <li>Position: Support the submission.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full - No build zone over stormwater easement.</li> </ul>	<p>Recommend to retain the provisions as notified, except where amendments are required outlined elsewhere in the s42A report.</p> <p>The original intent had been to show the 8m toe of the stopbank on the structure for greater clarity. This is not possible as Horizons have confirmed that they do not have a map showing the inland toe of the stopbank as it was not surveyed following construction of the stopbank.</p> <p>Instead a note is recommended to be included on the structure plan to outline that any excavation or earthworks or structures within 8m of the inland toe of stop bank may require consent from the Manawatu Wanganui Regional Council. This was discussed and agreed at the prehearing meeting.</p> <p>Recommend a guidance note is included on the structure plan as follows:</p> <p><u>Any excavation or earthworks (including planting of trees and shrubs) or structures (including some fences) on or within 8m of the inland toe of the stopbank or any other structure that is maintained by Manawatū-Whanganui Regional Council for the purposes of flood control may require consent from Manawatū-Whanganui Regional Council. Plan users are advised to consult with the Manawatū-Whanganui Regional Council for any works on or within 8m of the inland toe of the stopbank.</u></p>
Horizons Regional Council S22.003	Section 7: Map 7.10 Structure Plan	Support	<p>The structure plan outlines a 'no build zone' related to the stormwater easement and the inclusion is supported.</p> <p>Notes One Plan rule LF-AWBD-R68 requires resource consent for certain activities within 8m inland of the landward toe of a stop bank.</p>	<p>Retain the 'no build zone' in the structure plan.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full – Stop bank restricted area.</li> </ul>	<p>Recommend to accept the original and further submissions.</p> <p>As outlined in response to submissions S22.002 and S22.005, changes are recommended to ensure there is clarity for plan users about consent required from Horizons Regional Council.</p> <p>Recommend to retain the 'no build zone' in Map 7.10 Structure Plan.</p>
Jason Temperley S10.001	Map 7.10: Structure Plan	Amend	<p>The minimum lot size for the amount of stories or occupants may create too dense a housing development to fit in well with the surrounding neighbourhood, with this affecting the availability of outdoor space for recreation activities and rubbish storage and traffic flow in the surrounding area as Albert St, and Ruahine Street are the only main routes out.</p> <p>Considers a minimum lot size of 250m<sup>2</sup> is considered inadequate for a two-storey home or for a family.</p>	<p>Amend the structure plan and provisions to increase the minimum lot size.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose - Increase minimum lot size.</li> </ul>	<p>Recommend to reject the original and further submissions.</p> <p>As outlined above, careful consideration of the minimum lot size was given during the preparation of this plan change. The overall intent is to enable smaller sections to provide a variety of lot sizes and dwellings for the community.</p> <p>Refer to comments under S15.001 regarding the rationale for minimum 250 m<sup>2</sup> lot sizes/site areas in the RRA, including stormwater implications.</p> <p>Refer to the comments under S06.001 about the availability of recreation reserves in proximity to the plan change area.</p> <p>Refer to the comments under S06.001 about the transport trips predicted as a result of the plan change.</p> <p>No change is recommended as a result of this submission.</p>
Rangitāne o Manawatū S16.013	<ul style="list-style-type: none"> <li>Section 7: Objective 11, Map 7.10</li> <li>Section 10: Objective 16</li> </ul>	Support in part	<p>Wishes to see the design of the built environment, including public and community spaces, reflect and celebrate the stories and identity of Rangitāne.</p>	<p>Acknowledge and promote in Objectives 11 and 16 and related policies opportunities to celebrate Rangitāne cultural norms and traditions in the Roxburgh Residential Area, including:</p> <ul style="list-style-type: none"> <li>Street naming,</li> <li>Locally sourced indigenous vegetation in planting schemes,</li> </ul>	<p>Recommend to accept in part the original and further submissions.</p> <p>Issues in the submission that relate to opportunities celebrating Rangitāne cultural norms and traditions in the Roxburgh Residential Area, are better suited to other Local Government initiatives and Council policies rather than the District Plan. Provisions for dealing with street naming, indigenous vegetation, and design of the public open space are all outside the scope of the District Plan. For example, street naming is managed under Council's Street Naming and Numbering Policy 2012.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
				<ul style="list-style-type: none"> <li>Design of the public open space; that reflects Rangitāne's associations and connections with this area, and its riverine environment.</li> </ul> <p>Retain the proposed Structure Plan in Map 7.10, as notified.</p> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full – Reflection of Rangitāne in the development.</li> </ul>	<p>Mr Phillips has outlined in his Statement of Evidence the location of the proposed reserve is within the area guided by the <a href="#">Manawatu River Framework 2016</a>, and the river entrance construction project is planned for in the 2024/34 LTP. Mr. Phillips states in Section 5 (S016) of his evidence that Council will work with Rangitāne on the river entrance design and use indigenous species within the scope of the budget &amp; project.</p> <p>Recommend to retain Objectives 11 and 16 and the Structure Plan in Map 7.10 as notified, subject to amendments outlined elsewhere in the s42A report.</p>
Rosemary Watson S19.002	Map 7.10 Structure Plan (inferred)	Oppose	Notes that there is significant local public interest in community use of this land as future orchard/walkway and that amenity values for Tilbury Avenue residents adjacent to the Reserve nature strip should be preserved.	Delete and retain the Reserve for community use.	<p>Recommend to reject the submission.</p> <p>The issues of future orchards and walkways are not matters to be covered in the District Plan. The hearing Panel are only able to make a decision on the plan change as notified. This does not extend to whether the reserve should be exchanged as that was subject to separate process under the Reserves Act.</p>
Frances Holdings Limited S11.012	Section 7: Policy 11.1	Support in part	Considers that Policy 11.1 is better suited to an Objective, with associated subsections (b)(c) and (d) moved into the policies.	Amend Policy 11.1 to Objective 11 and consequentially move subsections (b)(c) and (d) to the policies.	<p>Recommend to accept in part the submission.</p> <p>Discussions were held during the prehearing with Frances Holdings Ltd about the appropriateness of Policy 11.1. Council requested revised wording from the submitter as to what is being sought. After the meeting the submitter provided updated wording for the policy as followed:</p> <p><i>To ensure that development is undertaken in an integrated and coordinated manner in general accordance with the Structure plan or otherwise achieves Objective 11.</i></p> <p>Discussion with the submitter also highlighted reference to 'better outcomes' although what this means remains unclear, as outlined in paragraph 5.62 of the s42A report.</p> <p>As outlined in the body of my s42A evidence in paragraphs 5.80 – 5.90, I have reviewed the policies and consider there is a change that could be made to objective 11.1 and policies 11.1-11.3 to provide greater clarity to plan users should departure from the Structure Plan be sought through a future Discretionary Activity consent.</p> <p>In paragraph 5.86 of the s42A report, have reviewed Objective 11 and I consider that it could be amended outline the overarching outcomes sought in the RRA. Additionally, I have reviewed the appropriateness of Policy 11.1 in paragraph 5.87 of the s42A report. I consider that changes to Policy 11.1 are recommended to emphasise the importance of the most optimal subdivision layout to be in general accordance with the structure plan as highlighted in Mr. McDonald's evidence.</p> <p>Refer also to the discussions in submission points S11.008 and S11.016 about the proposed amendments to Objective 11 and Policies 11.1-11.3.</p> <p>In response to the submission I recommend the following changes to Objective 11 and policies 11.1-11.3 as follows:</p> <p>Recommend to amend Objective 11 as follows:</p> <p><b>Objective 11:</b> <del>To ensure that a</del> Subdivision within the Roxburgh Residential Area <del>proceeds in a manner that:</del></p> <p><b>(a)</b> Delivers a <u>comprehensively designed and</u> connected residential area <u>which is integrated with the surrounding environment</u> <del>identified in the Structure Plan layout.</del></p>



Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p>(b) Manages stormwater in an integrated manner by implementing water sensitive design principles.</p> <p>(c) Provides for an increase in housing supply through a variety of housing types and sizes to achieve the efficient use of land and respond to housing needs and demands.</p> <p>(d) Creates a single pedestrian connection with the Manawātū River.</p> <p>Recommend to amend Policy 11.1 as follows:</p> <p><b>Policy 11.1:</b> To ensure that <u>subdivision layout</u> and development is undertaken in an <del>integrated and coordinated manner</del> in general accordance with the Structure <del>p</del>-Plan.</p>
Frances Holdings Limited S11.013	Section 7: Policy 11.4	Support in part	Concerned that Policy 11.4 includes methods that should be relocated to the Methods Section.	Relocate methods in Policy 11.4 to the Methods Section.	Recommend to reject the submission.  The purpose of the policy is to provide a directive for plan users to implement Objective 11. The policy will help plan users and planning officer's to meet the objective by ensuring that future owners/occupiers are aware of the contaminated soils and impervious area requirements.
Frances Holdings Limited S11.014	Section 7: Policy 11.5	Oppose	Opposed in relation to pervious surfaces for the reasons outlined in submission point S11.001, noting further that it is a Method not a Policy.	No specific change requested.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full – Pervious Surfaces.</li> </ul>	Recommend to reject the original and further submissions.  Refer to comments on the importance of retaining the pervious surface requirements under S11.001.
Frances Holdings Limited S11.015	Section 7: Policy 11.7	Oppose	Opposed in relation to on site permeability for the reasons outlined in submission point S11.001.	No specific change requested.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Neither support in full nor oppose in full – Onsite Permeability.</li> </ul>	Recommend to reject the original and further submissions.  Refer to comments on the importance of retaining the pervious surface requirements under S11.001.
Frances Holdings Limited S11.017	Section 10: Policy 16.1	Oppose	Considers that this policy is redundant as this matter is determined at subdivision consent and is already addressed in Section 7.	Delete Policy 16.1.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Oppose – Delete Policy 16.1</li> </ul>	Recommend to reject the submission. Recommend to accept the further submission.  Discussions were held during the prehearing with Frances Holdings Ltd about the appropriateness of Policy 16.1. Council requested revised wording from the submitter regarding all provisions and the intended outcomes sought by the submitter. After the meeting the submitter provided updated wording of the provisions which included the deletion of Policy 16.1. The submitter outlined in their response that the policy is a matter to be dealt at the subdivision stage of development.  However, I am of the opinion that the retention of Policy 16.1 is required as it is possible that land use development could occur before subdivision of the allotments. The policy is required to ensure that any development under Section 10 is undertaken in general accordance with the structure plan to ensure the required connectivity and wider useability of the site as intended by the overall plan change.  No changes to Policy 16.1 are recommended.
Frances Holdings Limited S11.018	Section 10: Policy 16.3	Support in part	Considers that the wording of this policy is unclear and requires further clarification.	Reword Policy 16.3 to provide improved clarification of the policy intent.  <b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"> <li>Position: Support – Reword Policy 16.3.</li> </ul>	Recommend to reject the original and further submissions.  The submitter clarified during a prehearing meeting on 12 February 2025, that they were referring to Policy 16.3, not Policy 15.5.  The policy has been written to outline that non-residential activity is to be provided on ground level or east-to-west road corridor.

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
					<p>One of the primary intentions of the plan change is to provide additional housing in the Palmerston North Urban Area. This has meant non-residential areas are not being actively enabled in the RRA. The policy intent is to allow additional housing in the plan change and not for primarily commercial purposes. Further provides guidance for Discretionary Activities for Non-Residential Activities.</p> <p>No changes to the wording of Policy 16.3 are recommended as a result of the submission.</p>
<p>Frances Holdings Limited</p> <p>S11.019</p>	Section 10: Policy 17.3	Oppose	<p>Considers that the policy should be deleted on the basis that neither permeability standards nor attenuation are required given the commitment to the new outfall infrastructure.</p>	<p>Delete Policy 17.3.</p> <p><b>Further Submission by Rangitāne o Manawātū:</b></p> <ul style="list-style-type: none"> <li>Position: Oppose the submission.</li> </ul> <p><b>Further Submission by Rosemary Watson:</b></p> <ul style="list-style-type: none"> <li>Position: Neither fully support nor fully oppose - Delete Policy 17.3 (re permeability limits and stormwater attenuation).</li> </ul>	<p>Recommend to reject the submission. Recommend to accept the further submission by Rangitāne o Manawatu and Ms. Watson.</p> <p>As outlined already throughout my evidence, I consider the proposed storm water objectives and policies in the provisions give effect to Horizons Regional Policy Statement RPS-UFD-P8, by incorporating water-sensitive design standards. Given the future regulatory intentions of the Regional Council, and the requirements for greater attenuation and reductions in contaminant discharge to the receiving environment, the Council has adopted policies and engineering requirements which require mitigation of stormwater runoff and contaminant discharge for any future development.</p> <p>In addition, Ms. Wood has outlined in her Statement of Evidence under paragraphs 90 and 91 that:</p> <p><i>Permeability limits have been set as part of a wider strategy to manage network capacity, reduce runoff and implement WSUD, not because the change in land use will generate additional runoff.</i></p> <p><i>These limits, combined with local upgrades have been identified to enable opportunities for partial redevelopment while more extensive and larger network capacity improvements can be undertaken.</i></p> <p><i>While Council are committed to progressing with the outfall improvement, there remains uncertainty in the timing as to when this work could be consented and constructed. The permeability limits are used to manage runoff from the Plan Change area in a manner that aligns with the available pipe capacity depending on whether the pipe outfall upgrade is in place or not. If permeability limits cannot be achieved, then Policy 17.3 provides for an alternative approach to be proposed, as long as the same flowrate is achieved. I do not consider that this policy should be removed as it provides context to subsequent planning assessments, particularly in regard to the need for flow management.</i></p> <p>With the pipe outlet being upgraded, it doesn't mean that on-site permeability won't be required for the reasons outlined in the Stormwater Servicing Report and Ms Wood's evidence.</p> <p>I concur with Ms. Woods evidence and consider that Policy 17.3 is required, as it provides guidance for adequate alternative storm water options if the permeability standards cannot be met.</p> <p>Refer also to submission S11.001 for additional comments about the permeable surface provisions.</p> <p>No changes to Policy 17.3 are recommended as a result of the submission.</p>
<p>Palmerston North City Council</p> <p>S09.003</p>	Section 7: Policy 17.3	Support in part	<p>Policy 17.3 has been included to provide guidance for consenting where permeability performance standards are not met. Based on the Stormwater Servicing Assessment of the area the subject of the proposed plan change, the network is already at capacity and cannot accommodate additional flow. Consequently, attenuating the</p>	<p>Amend Policy 17.3 as follows</p> <p>To require that where permeability limits are not achieved, onsite measures are provided and demonstrated to achieve stormwater <del>attenuation</del> <u>retention</u> at the same rate as the required permeability area.</p> <p><b>Further Submission by Rangitane o Manawatu:</b></p> <ul style="list-style-type: none"> <li>Position: Support.</li> </ul>	<p>Recommend to accept the original and further submissions.</p> <p>The purpose of the change is to provide certainty as what the acceptable storm water treatment solutions are. The stormwater servicing report has outlined that attenuating flows may adversely impact upstream of the catchment. Detention has been outlined as an acceptable storm water solution within the Stormwater Servicing Report.</p> <p>Recommend amending Policy 17.3 as follows:</p> <p>To require that where permeability limits are not achieved, onsite measures are provided and demonstrated to achieve stormwater <del>attenuation</del> <u>retention</u> at the same rate as the required permeability area.</p>

Submission Name and Point Number	Plan Change Provision	Position	Reasons	Decision(s) Requested	Officer Recommendations and Comments
			flow will not mitigate the effects of the increase in impervious area proposed and this needs to be reflected in the policy.	<b>Further Submission by Rosemary Watson:</b> <ul style="list-style-type: none"><li>Position: Neither support in full nor oppose in full – Amend Policy 17.3 (re permeability limits and stormwater attenuation).</li></ul>	