

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of proposed Plan Change E: Roxburgh
Residential Area to the Palmerston North City
Council District Plan

STATEMENT OF EVIDENCE – RESPONSES TO SUBMISSIONS ON PARKS AND RESERVES

AARON PHILLIPS ON BEHALF OF PALMERSTON NORTH CITY COUNCIL

Dated: 3 APRIL 2025

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EVIDENCE OF AARON PHILLIPS

A. INTRODUCTION

- [1] My full name is Aaron Phillips.
- [2] I hold a bachelor's degree with second-class honours in Resource and Environmental Planning and a post-graduate diploma in Business Administration.
- [3] I have 23 years' work experience in local government, made up of 2 years as an Active Transport Planner, 4 years as a Policy Analyst - including responsibility for development of a recreation needs assessment, 16 years working in parks and reserves as a Park Planner and most recently 2 years in parks activity management, leading a small team consisting of a Parks Planner and a Parks Projects Officer.
- [4] I have been engaged in relation to proposed Plan Change E (PCE), which seeks to rezone an industrial area in Hokowhitu for residential development and inserts an accompanying structure plan and provisions (objectives, policies and rules) into the District Plan.
- [5] I have been involved with PCE since its inception. My role has involved assessing and recommending parks and reserves provision within the proposed plan change area.

B. CODE OF CONDUCT

- [6] I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I confirm that I have stated the reasons for my opinions I express in this report and have considered all the material facts that I am aware of that might alter or detract from those opinions.
- [7] Statements expressed in this report are within the scope of my expertise.
- [8] I have all the information necessary to assess the application within the scope of my expertise and am not aware of any gaps in the information or my knowledge.
- [9] I am familiar with the site for PCE. I visited the site various times over the last two years for both this work and related work in the existing residential area.

C. SCOPE

[10] My report responds to a number of matters raised by submitters to PCE that are different to that proposed by the plan change. Submissions in agreement with parks and reserves related provisions are noted but not responded to in this report. The submissions responded to are:

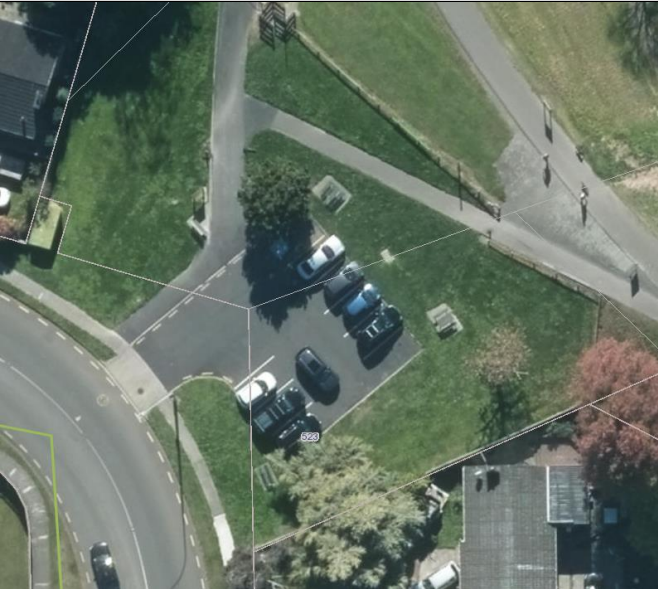
- (a) S06 - Edrei Valath – lack of recreational facilities
- (b) S011 - Frances Holdings Limited – width of road in relation to river access parking and timing of execution of land exchange
- (c) S016 - Tanenuiarangi Manawatū Charitable Trust Te Au Turoa Environmental Centre – use of indigenous species in landscaping and open space design reflecting Rangitāne’s associations with the river
- (d) S018 – Doug Kidd – reserve exchange should not proceed.
- (e) S019 – Rosemary Watson – Reserve exchange should not proceed, removal of trees in the part of Waterloo Park approved for exchange should not occur
- (f) S023 – Jackie Carr – provision should be made for a community garden

The further submissions responded to are:

- (g) FS3 – Rosemary Watson – providing a playground and a community garden

D. RESPONSES TO SUBMISSIONS

Submitter	Question/point raised	Response	Recommendation
S06 Edrei Valath	Lack of recreational facilities	<p>The Parks and Reserves Servicing Assessment 2024 for the proposed plan change considered provision of recreation facilities in detail.</p> <p>The assessment found there are 17 ha of open space within a 500 m walking distance of the proposed residential area. The quantity of accessible open space will be one of the highest in the city. The closest playground, at Waterloo Park, is 400m to 800 m walking distance to the south.</p> <p>The recreation provision was considered to meet Councils level of service for recreation provision for greenfield residential land development set out its Parks Asset Management Plan and detailed in the Engineering Standards for Land Development.</p> <p>No additional recreational facilities are required be provided for in the plan change, over and above what is already proposed.</p>	It is recommended that no change is made to Plan Change E as a result of this submission.
S011 Frances Holdings Limited	Reduce middle road cross section – demand for recreational parking not evidenced and additional parking not required.	<p>While difficult to quantify, Council has seen increased use over the last 10 years as the development of the Manawatu River Park has added facilities and improved the attractiveness of the river environments to the community and visitors.</p> <p>The river access car park at the corner of Ruahine Street 350 m north is regularly observed as full in the summer months, as can be seen in the following aerial photo.</p>	<p>Proposed central road width stays as proposed with 90 degree river access parking provided as notified.</p> <p>It is recommended that no change is made to Plan Change E as a result of this submission.</p>

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		 <p>Parks officers believe the modest number of additional parks provided by the 90 degree, rather than parallel arrangement, will be well utilised and are justified.</p> <p>The alternative of no additional car parking over and above parallel is likely to result in issues. For example comments were received about lack of parking in consultation on proposed community facility development (disc golf) in Ruamahanga Reserve. Ruamahanga Crescent has parallel on road parking in a narrow street environment around a river access.</p>	

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		If there is some medium density housing uptake, increasing the frequency of vehicle crossings and reducing on street parking available, then these pressures will be amplified.	
	Reserve exchange execution timing	<p>The exchange/relocation of the reserve has been approved by the Department of Conservation (DOC). That approval contains conditions that</p> <p><i>“a) That the Council approve a district plan change which changes the zoning of the Exchange Land to residential; and</i></p> <p><i>b) 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 shown in Appendix A, as provided with the application; and</i></p> <p><i>c) That the survey plan gets approved by Land Information New Zealand.”</i></p> <p>The exchange is approved but subject to execution. Execution can't occur until such time as there is a survey plan of the area to be received by Council, in the exchange, and that can be considered and approved by DOC.</p>	It is recommended that it is noted that the reserve exchange will only proceed if/when subdivision of the residential occurs.

Submitter	Question/point raised	Response	Recommendation
S016 Tanenuiarangi Manawatū Charitable Trust Te Au Turoa Environmental Centre	Landscaping involve indigenous species	<p>My response is limited to landscaping of the reserve land proposed to be located in the central area of the structure plan as opposed to street trees or landscaping within private property.</p> <p>The location of the proposed reserve is within the area guided by the Manawatu River Framework 2016. One of the key directions in that framework is restoring ecologies. This area will feature some specimen shade trees and some minor plantings, it is not suitable as an ecological restoration area as its purpose is to allow sight lines and open space for a river entrance. Native species would be prioritised.</p> <p>Landscaping of the reserve is typically operational matter dealt with at the time of development and iwi input sought for reserves they express an interest in.</p>	It is recommended that no change is made to Plan Change E as a result of this submission.
	Open space design reflects Rangitāne's associations with the river	<p>Council has allowed a river entrance, carpark contribution, pathway connection and reserve development budget in its 2024/34 Long Term Plan of \$153,000 in 2025/26.</p> <p>This is a secondary river access point, being less public on a local street as opposed to the Ruahine St bend entrance on a collector road. A new Roxburgh entrance was not contemplated in the Manawatu River Framework.</p> <p>The budget assumptions are for minor features worked into core elements of the facilities e.g. a modest pattern finish to a concrete path finish.</p>	It is recommended that no change is made to Plan Change E as a result of this submission.

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		<p>The budget assumptions and timing will be reviewed in light of plan change decisions and any other factors for the appropriate Annual or Long-Term Plan revisions.</p> <p>Council will work with Rangitāne on the river entrance design within the scope of the budget at the time of park development as is standard procedure.</p>	
S018 Doug Kidd	Part of Waterloo Reserve not be exchanged, and be retained where it is	<p>The option proposal to exchange land to reposition the strip of reserve land between properties on the northern side of Tilbury Avenue and the industrially zoned area was thoroughly considered by Council including having conducted consultation and hearing in accordance with the Reserves Act 1977.</p> <p>Reports and decisions are available here from:</p> <ul style="list-style-type: none"> • Submissions and hearings Agenda of Strategy & Finance Committee - Tuesday, 1 August 2023 • Decision report Agenda of Council - Monday, 18 December 2023 • Decision minutes Minutes of Council - Monday, 18 December 2023 <p>Earlier reports on the proposal to consult on the exchange and committee reports are also available.</p> <p>The exchange/relocation has been approved by the Department of Conservation (DOC). The exchange will not occur unless the plan change is approved, the Land Regulatory Delivery Manager of DOC approves the survey plan at time of subdivision , where the land being</p>	It is recommended that no additional change is made to Plan Change E as a result of this submission.

Submitter	Question/point raised	Response	Recommendation
		<p>received in the exchange must be substantially the same as that made in the exchange application to DOC and that the survey plan is approved by Land Information New Zealand.</p> <p>The plan change recognises the decision made for the reserve exchange.</p>	
S019 Rosemary Watson	Part of Waterloo Reserve not be exchanged, and be retained where it is	Refer response to S018	Refer response to S018
	Removal of trees in the portion of Waterloo Park approved for exchange subject to plan change.	<p>The reserve exchange reports considered the wattles and gums in the proposed reserve exchange area as part of that process which noted that even if the exchange did not occur, but the residential zoning did, then the trees would need to be removed due to their proximity to their overhang of the boundary and the destabilisation that would occur when the canopy was trimmed to the boundary and root systems were affected by excavations for housing construction.</p> <p>Further assessment has been completed by an independent arborist. The key finding of the report are:</p> <ul style="list-style-type: none"> - The trees are in overall good health with low risk of failure but are likely to be affected by the potential development of the industrial area and will likely need to be removed if the development enters the rootzone of the nearest trees. 	It is recommended that Plan change does not restrict tree removal on the land to be exchanged.

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		<ul style="list-style-type: none"> - The gum trees are not suitable for close proximity residential living and will continue to outgrow the space they are in. The development will likely put residences within fall distance of the trees adding to potential risk in storm events. - The STEM scores for the gums range from 45 to 108. <p>This STEM scores are well below the score of 160 used for a threshold for notable tree consideration in the Palmerston North District Plan.</p>	
S023 Jackie Carr	Requesting a community garden	<p>Councils process for permitting community gardens is available on its website Community gardens Palmerston North City Council. The process was recently simplified to reduce the barriers to establishing a garden and is now managed through a permit process rather than the previous more involved lease process. The gardens are community managed and the fundamental steps are:</p> <ul style="list-style-type: none"> - 3 or more people work together on a proposal - They apply to Council with either a particular location or general area idea in mind. - Council officers carry out due diligence on the proposal including: <ul style="list-style-type: none"> o Discussion the proposal with manu whenua o Checking for underground services or other site and immediate surrounding constraints. 	It is recommended that no change is made to Plan Change E as a result of this submission.

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		<ul style="list-style-type: none"> ○ Carrying out a focused engagement with immediate neighbours and known reserve users, including having a sign on site. ○ Council officers make a decision, it if the decision is to approve the garden draft a permit with any conditions. ○ The group consider the conditions and decide whether to proceed. <p>There is a space of approximately 700 sq m that could potentially be used for community gardens north of the Scout Hall off Ayr Place in close proximity to the proposed plan change area. This area already has some Council planted fruit trees in it. There may also be opportunities on parts Waterloo Park south of the Scott Hall.</p>	
<p>FS3</p> <p>Rosemary Watson</p> <p>Commenting on submission S06</p>	<p>Use the central open space for a children's play area</p>	<p>Discounting any possible access to Winchester School facilities the nearest playground is 400 m to 800 m away at Waterloo Park. The entire site would be within 250 m walking distance of open space.</p> <p>Providing an additional playground would exceed the level of service provided in the rest of the city and be contrary to levels of service set out for other residential development areas such as Aokautere and Mātangi plan change areas.</p> <p>Some simple cost-effective natural play features could be developed as part of the exchanged reserve land development – for example rocks to balance on or hopscotch worked into a concrete path. Minor playful features would be considered at the time of the reserve development.</p>	<p>It is recommended that no change is made to Plan Change E as a result of this submission.</p>

Submitter	Question/point raised	Response	Recommendation
	No provision is made for a community garden	<p>Refer response to S023.</p> <p>A community garden proposal could be considered on the exchanged land if one come forward but officers suggest a better location would be next to the scout hall where there is a public toilet, and potential for collaboration with the scouts over things like equipment storage. An open space environment with adjacent car parking would be better for the river access.</p>	It is recommended that no change is made to Plan Change E as a result of this submission.