

SUMMARY OF EVIDENCE OF EAMON MICHAEL GUTHRIE

PROPOSED PLAN CHANGE E – ROXBURGH CRESCENT

A. INTRODUCTION

- [1] My name is Eamon Michael Guthrie. I prepared a s 42A report dated 24 April 2025 and reply evidence dated 16 May 2025 on planning matters relating to proposed Plan Change E: Roxburgh Residential Area (**RRA**) to the Palmerston North District Plan (**PCE**). My experience and qualifications are set out in my s42A Report.

B. KEY MATTERS REMAINING UNRESOLVED

- [2] I have reviewed the original and further submissions from the submitters, and evidence from submitters evidence provided to the Council on behalf of Frances Holdings Limited (**FHL**) and Horizons Regional Council.
- [3] I consider that there are three key matters where agreements have not been reached. These matters include the management of stormwater, maximum lot sizes, and (two) design elements of the Structure Plan. I note there is an overarching point of FHL relating to what has been described by its witnesses, the 'prescriptiveness' of the proposed Structure Plan.

C. POINTS OF CLARIFICATION

- [4] Upon the review of my Summary Statement, I wish to bring to the panel's attention that I've amended the wording Rule 10.6.3.3(vii) bullet point 4 in relation to storm water design. The District Plan has been amended since PCE was notified in October 2024. I wish to highlight to the panel that these provisions relate to development in the Aokautere Residential Zone, and not the proposed Roxburgh Residential Area.

D. SUMMARY OF PLANNING EVIDENCE

Stormwater

- [5] The current stormwater network does not meet the minimum service requirements in the existing Roxburgh Industrial Area. The outlet pipe upgrades are required to bring the stormwater level of service to the minimum level. Runoff rates will be lower with residential

development however, this reduction is not sufficient to mitigate the need for capacity improvements to the existing stormwater network. The RRA is at the downstream end of the catchment so only permeable surfaces and Water Sensitive Design Elements are appropriate stormwater mechanisms. Ms. Wood consider that Permeable Surface Standards and Water Sensitive Design Elements are the most appropriate mechanism to address stormwater matters in the RRA.

- [6] Taking into account the evidence of Ms. Wood, I am of the view that the recommended stormwater provisions in PCE are an appropriate policy response to the stormwater issues raised in the stormwater servicing report and supported through Ms Wood's s42A evidence and Reply evidence.
- [7] Based on the advice I have had from Council's stormwater experts; I consider that the proposed provisions are consistent with the relevant higher order documents. I note that this view is supported by the Horizons submission and the evidence of Mr. Wickramasinghe. While Mr Thomas has raised concerns in this regard, I note that he has not addressed the relationship of the stormwater provisions with the One Plan.
- [8] I continue to support the management of stormwater as proposed through PCE, and do not make any recommendations for change arising out of the submitter's evidence.

Heights in the River Front Area

- [9] Despite concerns from submitters, I am of the view that 11m height limit is appropriate, taking into account Mr. McDonald and Mr. Charnley's evidence. The proposed height limit aligns with the purpose of PCE to provide for intensification without compromising with the character of the river corridor. I consider that the height provisions will work to create a vibrant, well-functioning urban environment while enhancing safety and connectivity. I also note that the height provisions in PCE align with NPS-UD and FDS provisions to increase housing types and sizes. No changes to the height restrictions are recommended.

Heights along existing Residential boundaries

- [10] Submitters along existing residential zone boundaries raised concerns that new development would result in privacy, shading, and visual dominance issues on their properties.

- [11] I am of the view that amending other provisions such as height and height recession planes would be inconsistent with the District Plan's goals of increasing housing density and choice, as outlined in the FDS and NPS-UD.
- [12] However, in response to concerns from Tilbury Avenue residents, a proposed 5-metre setback is recommended from Tilbury Avenue boundaries. The purpose is to mitigate residential interface effects while still allowing intensive development, consistent with provisions in the operative Residential Zone. Shading diagrams have been provided to illustrate potential impacts (through Mr Charnley), and Mr. McDonald emphasized that the height recession plane provisions would sufficiently manage privacy & building bulk concerns.
- [13] I do not recommend any other changes to provisions in response to the existing residential interface with Ruahine Street residents. The existing industrial-to-residential transition is expected to improve streetscape quality, compared to the current poor interface with industrial buildings.

Lot Sizes

- [14] FHL considers the maximum lot and site size provisions should be increased from 500m² to 600m².
- [15] Taking into account the evidence of Mr. McDonald, I do not consider that changes to the minimum or maximum lot sizes are justified.
- [16] The PNCC HBA outlines between 2021 and 2022 that 3-4-bedroom houses compromised 77% of new residential buildings. The findings contained in the HBA have been reflected in the FDS which outlines that lower-medium lot sizes and dwellings in Palmerston North in the short-medium term.
- [17] PCE seeks to respond to this shortfall by enabling smaller house sizes through the building provisions such increased heights adjacent to the river, relaxed height recession planes, increased site coverage allowances, and reduced lot sizes.
- [18] I am of the view that increasing lot sizes would not align with the one of the key purposes of PCE, which is to enable higher density options and provide for a range of housing options & sizes. There are already other areas in Palmerston North and the Hokowhitu suburb which enable larger lot sizes.

- [19] If lot sizes were increased, it would reduce the available yield in the RRA, which would not help meet Council's FDS housing targets. No changes to the provisions are recommended.

Structure Plan

- [20] As a general comment, I do not agree with the submitters evidence suggesting that the Structure Plan is too prescriptive or lacks flexibility. I remain of the view that the level of detail and flexibility in the Structure Plan and PCE provisions is appropriate.
- [21] As discussed by Mr McDonald, the Structure Plan provides for the 'bare bones' (or building blocks) of future development. In my view the Structure Plan appropriately represents those components that are considered critical to the delivery of the broader plan change outcomes and/or manages specific effects. This has been undertaken in a manner that will ensure that residential development is layout is well-connected, manages stormwater, provides for a variety of housing types and sizes, and enables the provision of reserves.

Road B

- [22] Frances Holdings Ltd contend that there should be flexibility in the structure plan as there may be better design options available.
- [23] I made changes to Objective 11 and Policies 11.1-11.3 to ensure consistency between the proposed provisions and outcomes sought in the Structure Plan, in response to concerns raised in original submissions by FHL and Mr. Higgins. I consider my changes to these objectives to policies are appropriate as they provide clarity regarding intended subdivision design and layout outcomes. Furthermore, I am of the view that the amendments to the provisions, give appropriate direction to plan users and provide greater certainty for when a development seeks a different outcome to that shown in the Structure Plan.
- [24] FHL propose making the northern portion of Road 'B' optional or replacing it with a laneway. I maintain the opinion that retaining Road 'B' in its entirety is important for achieving a well-connected, walkable street network, as supported by Mr. Groom's evidence. I do not agree that Road 'B' should be optional. I acknowledge that a laneway could be considered, however, the evidence of Mr Groom and Mr McDonald, acknowledge limitations with this approach.
- [25] Relying on the evidence of Mr Groom and Mr McDonald, I do not support the use of private right of ways. I do not consider that private right of ways would result in a well-connected RRA

that integrates into the surrounding residential area, which is an important element of the structure plan. No changes to the provisions are recommended.

Location of Reserves

- [26] FHL suggest flexibility in the reserve's location to be either north or south of Road 'D'. Both the northern and southern locations are supported by urban design and Parks and Reserves evidence.
- [27] I am of the view that the reserve should continue to be shown as it is within the Structure Plan, as the location approved through the reserve exchange process.
- [28] However, to provide flexibility in the event that there are changes in the future, I consider that the reserve could be identified as 'flexible' in terms of location, with another option, subject to the matters identified by the experts, being available should it become a feasible in the future. This would ensure that the Structure Plan did not limit optionality at a later date if the reserves process was utilised or relied on to provide for another reserve location.
- [29] The location of the reserve could be shown as flexible on the Structure Plan, being to the north and south of Road 'D'. If this was option considered further by the Hearing Panel, then the plan framework may also need to be updated to provide a pathway for this alternative option.
- [30] I will be able to provide a s32AA evaluation to the panel about the location of reserve and proposed amendments to the provisions following the hearing.

19 May 2025

Eamon Michael Guthrie