



14 August 2025

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The Hearing Panel.
Proposed Plan Change I
C/o Hearing Administrator
Palmerston North City Council
32 The Square
Palmerston North 4410

Reference: PT00017

Attention: Mckayla Jaggard

PROPOSED PLAN CHANGE I: SUBMISSION BY GENEVA HOUSING LTD.

Geneva Housing Ltd (GHL) has filed a submission seeking that instead of zoning the two properties at 353 and 355 Albert Street Hokowhitu Medium Density Residential they be zoned Local Business Zone.

The submission acknowledges that there is potential for this submission to be excluded on grounds of scope.

The consideration of scope issues by the panel ahead of the substantive issues is supported.

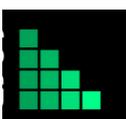
The context of this submission is that GHL owns both properties but has immediate plans to redevelop 353 Albert Street for a commercial activity. In early discussions with Council officers on this matter there was firm opposition to addressing this matter by way of resource consent without first a change to the zone.

Consequently, a private plan change request limited to 353 Albert Street was lodged on 7 February 2025. On 25 March 2025 a letter was received from the Council advising that the Council was now prepared to consider this matter as a resource consent pursuant to Clause 25 sub clause (3) of the First Schedule. This was subject to the provision of further information which is now being advanced.

The section 42A report for PC I indicates strong support for the zoning of both 353 and 355 as local business but considers the submission is not on the Plan Change.

As an experienced Commissioner I am very familiar with the legal tests for scope and have had to apply them on many occasions.

The tests have evolved through case law and focus on the ambit of the plan change and fairness of process. Alongside this is the robustness of the section 32 evaluation.



In relation to the latter matter GHL did at the time distribute its submission to all adjoining neighbours and did actively engage in dialogue with one neighbour as a result.

In terms of ambit the question is whether the ambit is “where and in what form should a Medium Density Zone be established” or in addressing these sites “what should the appropriate zoning of 353 and 355 Albert Street be. One of course is a more macro approach and the other a site specific one.

This letter has awaited the Councils legal submissions on scope. Those submissions have now been reviewed and do not support the GHL submission on scope grounds as the relief sought does not address the change from the status quo.

While it is tempting to get into more detail on this matter the position is that GHL has a consent pathway in place for the redevelopment of 353 Albert Street and is pursuing it. GHL does not propose to redevelop 355 Albert Street in the short term and therefore rezoning of this land can, if necessary, await a review of the local business zone.

Consequently, GHL does not wish to be heard on its submission either on scope or substantive matters and will accept whatever scope finding the panel makes.

Yours sincerely,



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