

## Further Submission - RMA Form 6

Further Submitter Contact Details			
Full Name	<i>Last Name</i>		<i>First Name</i>
	White		Louise
Company/Organisation Name (if applicable)	Leith Consulting Ltd		
Contact Person	Louise White		
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Mail Address for Service (if different)	N/A		
Phone	<i>Mobile</i>	<i>Home</i>	<i>Work</i>
	027 665 4592		
Attendance and wish to be heard at the hearing:			
<input type="checkbox"/> I do not wish <input checked="" type="checkbox"/> I wish <b>To be heard in support of my further submission</b> <i>(Please tick relevant box)</i>			
<input type="checkbox"/> I will <input checked="" type="checkbox"/> I will not <b>consider presenting a joint case with other submitters, who make a similar further submission, at a hearing.</b> <i>(Please tick relevant box)</i>			
Relevance - you must select one box that applies to you:			
<input type="checkbox"/> I am a person representing a relevant aspect of the public interest  <input checked="" type="checkbox"/> I am a person who has an interest in the proposal that is greater than the interest the general public has  <input type="checkbox"/> I am the local authority for the relevant area			

Submission Table						
Submitter Name/ Submission Number	Submission Point Number	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Allow or disallow	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Patricia Cardinelli- Wayne (SO01)	SO01.01	Support in part	Submitter has requested disabled access to homes.	I oppose this request as there are other methods for achieving accessibility for people within a home. This matter should be dealt with under the Building Code/Building Act regarding accessibility for those that are physically impaired. However, accessible parking standards could be adopted for medium density developments which require accessible pathways to the front entrance of developments.	Allow in part	Request that part of the submission seeking disabled access be considered for medium density developments.
BP, Mobil and Z Energy (The Fuel Companies) (SO78)	SO78.5 and SO78.6	Support	Submitter has requested 'reverse sensitivity' be added as another matter of discretion to MRZ-S3	Support the intent and request of the submission as reduced setbacks enabled by the plan change already reduce the separation distance of lawfully established commercial or industrial activities from the residential activities/ sensitive activities which may cause reverse sensitivity issues.	Allow	Whole submission points allowed and relief sought.
Palmerston North City Council (SO166)	SO166.19	Support in part	Submitter has requested a 'trigger' area for requiring stormwater treatment	Support the intent of this submission and the requested change as long as the 'trigger area' is supported by evidence that that is a suitable size 'trigger' for meeting the policy intent of the Rule.	Allow in part	Whole submission points allowed and relief sought on the basis that evidence for the 'trigger area' is provided by PNCC.
Palmerston North City Council (SO166)	SO166.20	Support	Submitter has requested a default activity status of a discretionary activity for activities and buildings not captured under the new provisions.	Support the intent of this submission and the requested change as this aligns with other District Plans and ensures that adverse effects of anticipated buildings/activities can be considered through a resource consent process.	Allow	Whole submission points allowed and relief sought.
Palmerston North City Council (SO166)	SO166.26	Support	Submitter has requested accessory buildings can be up to 2m in height within setbacks.	Support the intent of this submission and the requested change for the reasons given in the submission.	Allow	Whole submission points allowed and relief sought.
Palmerston North City Council (SO166)	SO166.27	Oppose	Submitter has requested wording changes from 'street frontage' to 'front yard' for specimen trees.	Properties that do not have a street frontage (rear site) may wish to locate their specimen tree within a side yard rather than the 'front yard' of their dwelling where they are locating their outdoor living space which may be restricted in size for providing a specimen tree when considering decking/paving and shading such as pergolas. Permitting a specimen tree to be located in a rear or side yard should be permitted for properties without street frontage as it still meets the policy intent of the rule and the trees may be more visible from the streetscape if located within a side yard, for example. It also raises the question of what is considered a 'front yard' for sites that do not have street frontage (e.g connected via an access leg or right of way to the street). I note that 'front yard' is not defined under the Plan Change so a new definition may need to be added if the change goes ahead.	Disallow	Disallow submission point and relief sought.
Palmerston North City Council (SO166)	SO166.34	Support	Submitter has requested correction to figure number and adding advice note regarding swept path standard.	Support the intent of this submission and the requested change for the reasons given in the submission.	Allow	Whole submission points allowed and relief sought.
Palmerston North City Council (SO166)	SO166.36	Support in part	Submitter has requested a communal rubbish storage area be provided for 4 or more residential units.	Some developments (e.g a right of way serving more than 3 residential units) will need a communal storage area for bins to be collected by a rubbish and recycling truck within the development (as there may not be sufficient room kerbside). However, residents should still have the option to store their bins within their on site/property day-to-day. I suggest this amendment is further amended so make it clear the intent is for storing the bins for collection purposes only within the site (however the development could still provide a communal rubbish bin area as a permitted activity). That way the area dedicated for bin storage for collection purposes can be multi purposeful and perhaps be	Allow in part	Request that part of the submission point requiring communal rubbish bin storage for more than 3 residential units be allowed with amendments regarding a more nuanced approach be considered.

Submission Table						
Submitter Name/ Submission Number	Submission Point Number	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Allow or disallow	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
				used for visitor car parking when not being used for 'bin storage for collection purposes'.		
Palmerston North City Council (SO166)	SO166.47	Support	Submitter has requested insertion of new rule SUB-MRZ-R1A.	Support the intent of this submission and the requested change for the reasons given in the submission.	Allow	Whole submission points allowed and relief sought.
Phocus Planning (SO185)	SO185.44	Support in part	Submitter has requested reconsideration of this rule and its activity status	Support the intent of the submission in so far as difficulty of interpretation of rule, there should be a permitted activity threshold and their reference to impacts from stormwater from the roading system itself.	Allow	Whole submission points allowed and relief sought.
Phocus Planning (SO185)	SO185.29	Support in part	Submitter has requested reconsideration of this rule and its activity status.	Support the intent of the submission in so far as this will cause potential unintended consequences for small building alternations and structures I had not considered under my original submission. For example, constructing a small pergola should not trigger requiring a full stormwater management plan via a RDA resource consent process unless the Council has provided strong evidence that the accumulative effects in this stormwater overlay support the additional cost burden of supplying a stormwater management plan. Would stormwater detention devices required under MRZ-S10 not be sufficient for small scale structures/activities? PNCC needs to provide strong evidence to support the approach taken under MRZ-R10.	Allow	Whole submission points allowed and relief sought.

## FS - 02-1

### FURTHER SUBMISSION ON PLAN CHANGE I: INCREASING HOUSING SUPPLY AND CHOICE TO THE PALMERSTON NORTH DISTRICT PLAN UNDER CLAUSE 8 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

**To:** Palmerston North City Council  
32 The Square  
Palmerston North 4410

**Name of Submitter:** Crest Hospital Limited

**Address:** c/- MinterEllisonRuddWatts  
PO Box 3798  
AUCKLAND 1140  
Attention: B Tree

#### Introduction

1. Crest Hospital Limited (**Crest**) is a submitter (SO197) on Proposed Plan Change I: Increasing Housing Supply and Choice to the Palmerston North District Plan (**Plan Change**). The Plan Change was notified 20 November 2024, and the Summary of decisions was notified on 12 March 2025.
2. This is a further submission on behalf of Crest on submission points of the Ministry of Education Te Tāhuhu o Te Mātauranga (SO196).
3. Crest has an interest in the proposal that is greater than the interest of the general public. An overview of Crest's interest in the Plan Change is set out in Crest's primary submission.

#### Further submission

4. Crest's further submission points and reasons are set out in the table at **Appendix A** to this further submission.
5. In addition to the specific reasons identified in Appendix A, the reasons for this further submission are to ensure that the Plan Change:
  - (a) will recognise that hospitals and healthcare facilities contribute to well-functioning urban environments;
  - (b) will give effect to the objectives and policies of the National Policy Statement on Urban Development 2020;

- (c) is consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991;
- (d) will meet the reasonably foreseeable needs of future generations; and
- (e) is consistent with sound resource management practice.

**Relief sought**

- 6. The relief sought by Crest is set out in the table at **Appendix A** to this further submission.
- 7. Crest also seeks such other additional or consequential relief to give effect to the matters raised in this further submission.
- 8. Crest wishes to be heard in support of its further submission. If others make a similar submission, Crest will consider presenting a joint case with them at hearing.

**DATED** this 24<sup>th</sup> day of March 2025.

**Crest Hospital Limited** by its solicitors and  
duly authorised agents  
MinterEllisonRuddWatts



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**B Tree / H-M Rearic**

## **FS - 02-3**

### **Address for service of submitter**

Crest Hospital Limited

c/- MinterEllisonRuddWatts

P O Box 3798

AUCKLAND 1140

Attention: B Tree / H-M Rearic

Telephone No: (09) 353 9700

Fax No. (09) 353 9701

Email: bianca.tree@minterellison.co.nz

holly-marie.rearic@minterellison.co.nz

## FS - 02-4

**Appendix A** – Further submission of Crest Hospital Limited (**Crest**) on Proposed Plan Change I: Increasing Housing Supply and Choice to the Palmerston North District Plan.

Submitter	Sub no./point no.	Support / oppose	Reason for support	Decision sought
Ministry of Education Te Tāhuhu o Te Mātauranga	SO196.2	Support	<p>Crest supports the inclusion of the National Policy Statement on Urban Development 2020 (<b>NPS-UD</b>) definition of Additional Infrastructure in the Palmerston North District Plan.</p> <p>The amended definition will provide certainty and clarity as to what activities are considered to fall under the term Additional Infrastructure.</p> <p>Further, the amended definition will recognise that hospitals and healthcare facilities contribute to well-functioning urban environments and give effect to the objectives and policies of the NPS-UD.</p>	Allow.
	SO196.4	Support	<p>Crest supports amending Objective MRZ-O2 to include Additional Infrastructure. It seeks that the words are capitalised to indicate to readers that it is a defined term.</p> <p>In conjunction with the new definition of Additional Infrastructure above, the amendments will clarify the interface between additional infrastructure and surrounding residential activities to ensure that residential development is appropriately integrated with both the existing and planned infrastructure and give effect to the objectives and policies of the NPS-UD.</p>	Allow.

24 March 2025

RAI 04 03  
2025  
AW:LMS

The Governance Team  
Palmerston North City Council  
Private Bag 11034  
**PALMERSTON NORTH**

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

Dear Madam/Sir,

**FURTHER SUBMISSION: PROPOSED PLAN CHANGE I – INCREASING HOUSING SUPPLY AND CHOICE.**

Thank you for the opportunity to provide further submission on the Proposed Plan Change I: Increasing housing supply and choice.

Horizons Regional Council (Horizons) is responsible for managing natural resources across our region, which includes flood control, air and water quality monitoring, pest control, facilitating economic growth, leading regional land transport planning and coordinating the region's response to natural disasters.

Environmental planning is a key function. Horizons' integrated planning document, the One Plan, sets out four keystone environmental issues for the region – surface water quality degradation, increasing water demand, unsustainable hill country land use, and threatened indigenous biodiversity.

Horizons has no trade competition advantage in this submission. Our interest in the proposed plan change is primarily from our role as the regional authority for the area that is subject to the plan change. The submission reviews the proposed district plan change in light of its alignment with the Regional Policy Statement component of the One Plan and ensures that the proposed changes are consistent with our Regional Plan provisions.

Horizons submits in **opposition** to parts of the submission made by SO199 Kāinga Ora. Specifically, Horizons opposes the following submission points:

1. SO199.5: Horizons opposes the request to delete the following parts of SUB-MRZ-P1:

- *"renewable energy and other"*
- *"1.Optimise solar gain;"*
- *"2.Incorporate water sensitive design\*;"*

The above provisions are required to give effect to Horizons' One Plan [RPS-UFD-P8](#)



*(1) Urban environments are developed in ways that support reductions in greenhouse gas emissions and improve resilience to the effects of climate change by:*

*(a) use of urban design, building form and infrastructure to minimise as far as practicable the contribution to climate change of the development and its future use, including (but not limited to) energy efficiency (including methods to ensure whole-of-life energy efficiency), water efficiency, waste minimisation, transportation modes (including use of public transport and active transport) **water-sensitive design** and nature-based solutions,*

...

*(2) Territorial authority decisions and controls:*

...

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

**Relief sought:** Retain the above provisions in SUB-MRZ-P1 or include alternative provisions that give effect to RPS-UFD-P8 (2)(b).

2. **SO199.8:** Horizons opposes:

- the request to delete Stormwater Overlay
- the amendments requested for SUB-MRZ-P4

Horizons recognizes that PC 1 is a significant step towards enabling housing intensification in Palmerston North. However, limited capacity of stormwater related infrastructure constrains the city's infill capacity. To address this, a consenting assessment should be required for areas with insufficient infrastructure capacity to manage stormwater concerns effectively.

The stormwater overlay has been identified as a strategic provision to manage intensification in areas prone to stormwater issues. While there could be data gaps in fully justifying stormwater overlay, Horizons considers it a precautionary approach to mitigate potential issues arising from infill development in this area. Horizons submits that the stormwater overlay is a key provision in giving effect to Horizons' One Plan:

- RPS-HAZ-NH-P12 *The Regional Council and Territorial Authorities **must manage future development** and activities in areas susceptible to natural hazard events (excluding flooding) in a manner which:*

...

*3. is unlikely to cause a significant increase in the scale or intensity of natural hazard events.*

- RPS-HAZ-NH-P13 *The Regional Council and Territorial Authorities must take a precautionary approach when assessing the effects of climate change and sea level rise on the scale and frequency of natural hazards with regard to decisions on:*
  1. *stormwater discharges and effluent disposal,*...

**Relief sought:** Retain stormwater overlay related provisions subject to Horizons' original submission points.

3. SO199.22: Horizons opposes the request to delete MRZ-P7 for the same reasons outlined in the submission point 2 above.

**Relief sought:** Retain MRZ-P7.

4. SO199.23: Horizons opposes the request to delete MRZ-P10.

MRZ-P10 gives effect to Horizons' One Plan provision RPS-UFD-P8 (2)(b).

Horizons' original submission requested revisions to MRZ-R7 to MRZ-R15 to ensure they give effect to MRZ-P10.

**Relief sought:** Retain MRZ-P10 and revise MRZ-R7 to MRZ-R15 to ensure they give effect to MRZ-P10.

Horizons submits in **support** of a part of the submission made by SO210 Natural Hazards Commission Toka Tū Ake.

1. SO210.14: Horizons supports the request to amend MRZ-S11:

Even though Horizons' OnePlan does not specify a required minimum floor level based on 1% AEP event for area subject to PC I, Horizons considers the requested amendment to be a precautionary approach, particularly in light of the impacts of climate change.

Horizons wishes to be heard in support of this submission. If others make similar submissions, Horizons would be open to presenting a joint submission to the hearing panel.

Yours sincerely,



Arana Wickramasinghe  
SENIOR POLICY PLANNER

Address for service:  
Arana Wickramasinghe  
Policy and Strategy Team  
Horizons Regional Council  
Private Bag 11025  
Manawatu Mail Centre  
PALMERSTON NORTH 4412  
Email: [Arana.Wickramasinghe@horizons.govt.nz](mailto:Arana.Wickramasinghe@horizons.govt.nz)

# Further submission on Proposed Plan Change I: Increasing housing supply and choice



## Your contact details

This submission form should be used for making a further submission on Proposed Plan Change I: Increasing Housing Supply and Choice (in accordance with Clause 8 of the First Schedule, Resource Management Act 1991)

### Privacy

When a person or group makes a submission or further submission on a District Plan change, this is public information. Please note that by making a submission your personal details, including your name and address, will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to Palmerston North City Council.

There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential, please email our governance team: [submission@pncc.govt.nz](mailto:submission@pncc.govt.nz)

For more information, see our [privacy statement](#)

**First name** Required

Tatyana

**Last name** Required

Kooznetzoff

**Organisation you represent** If applicable. Please only answer this question if you are speaking on behalf of an organisation.

Arohanui Hospice Limited

**Postal address** Required

**Email** Required

tkooznetzoff@propertygroup.co.nz

**Phone** Required Please provide a daytime contact number

027 250 3499

## Hearing

A hearing date will be confirmed once submissions close.

**Do you want to speak to Council in support of your further submission? (Select 1 option)**

- ☒ Yes
- ☐ No

Answer this question if you selected 'Yes' in *Hearing > Do you want to speak to Council in support of your further submission?*

**Will you consider presenting a joint case with other submitters who make a similar further submission at a hearing? (Select 1 option)**

- ☒ Yes
- ☐ No

## Relevance

**What is the best to describe your relevance? (Select 1 option)**

- ☒ I am a person representing a relevant aspect of the public interest.
- ☐ I am a person who has an interest in the proposal that is greater than the interest the general public has.
- ☐ I am the local authority for the relevant area.

**Explain/specify the grounds for saying that you come within this category**

*Example - Submission number [insert submission reference number here] directly affects the property at XXX, which I own*

Arohanui Hospice Limited represent relevant aspects of the public interest for the reasons outlined in SUB SO 204

24 March 2025  
Our Job no. 720074

The Governance Team  
Palmerston North City Council  
Private Bag 11034  
Email [Submission@pncc.govt.nz](mailto:Submission@pncc.govt.nz)  
**Palmerston North**

To: The Governance Team

## **Further Submission on Proposed Plan Change I - Increasing Housing Supply and Choice – Under Clause 8 of the First Schedule, Resource Management Act**

**Name of further submitter**                      Arohanui Hospice Limited

**Original Submission Number**                      SO 204

### **1. Introduction**

- 1.1. Arohanui Hospice Limited make this further submission on Plan Change I – Increasing Housing Supply and Choice (PCI), in support of/in opposition to the original submissions on PCI.

### **2. Reasons for further submission**

- 2.1. The submissions that Arohanui Hospice Limited support or oppose are set out below in respect of the third-party submissions to PCI. Arohanui Hospice Limited:

- a. **Oppose** submission point **SO42 by Ikap Holdings Limited** seeking to reduce the zone extent to exclude properties on Ruahine, Featherston Street and Heretaunga Street from the Medium Density Zone (MDZ) for the reasons below:
  - i. Although the original submission does not relate specifically to the Arohanui Hospice site, it seeks to exclude properties on Featherston Street and Heretaunga Street from the Medium Density Zone (MDZ). Arohanui Hospice Limited's submission provides reasons as to why the zone extent should be expanded to include its property on Heretaunga Street.
  - ii. The impacts of future development on existing public infrastructure and its capacity can be appropriately considered and controlled at resource consent stage when the specific impacts are known.
- b. **Support** submission points **SO-194.1 by Horizons Regional Council** insofar as:

- i. The relief sought by Horizons Regional Council for PNCC to take the necessary actions to amend PCI if there is any unused capacity to enable higher density development, specifically in regard to extending the spatial extent of the MDZ. This aligns with the reasons for Arohanui Hospice Limited's submission to extend the MDZ to include the Arohanui Hospice site.
- c. **Oppose** the general submission comments of submission **SO-185** by **Phocus Planning** insofar as:
  - i. It questions the need to apply the MDZ across 60% of the City and whether medium density is attainable and necessary. No specific relief is sought on this matter.
  - ii. It conflicts with submission point **SO-194.1** by **Horizons Regional Council** for PNCC to take the necessary actions to amend PCI if there is any unused capacity to enable higher density development and specifically the spatial extent of the MDZ.
  - iii. It conflicts with Arohanui Hospice Limited submission that the spatial extent of the MDZ should include the Arohanui Hospice site.

### 3. Introduction

- 3.1. Arohanui Hospice Limited wished to be heard in support of its further submission.
- 3.2. Arohanui Hospice would not gain a trade competition advantage through this submission.
- 3.3. We would welcome an opportunity to meet with Council staff and representatives to discuss the submission in further detail.

**Prepared by:**



**Tatyana Kooznetzoff**

Planning Consultant

021 250 3499

[Tkooznetzoff@propertygroup.co.nz](mailto:Tkooznetzoff@propertygroup.co.nz)

**Peer reviewed by:**



**Ryan O'Leary**

Central Planning Manager

027 469 8992

[ROleary@propertygroup.co.nz](mailto:ROleary@propertygroup.co.nz)

# Further submission on Proposed Plan Change I: Increasing housing supply and choice



## Your contact details

This submission form should be used for making a further submission on Proposed Plan Change I: Increasing Housing Supply and Choice (in accordance with Clause 8 of the First Schedule, Resource Management Act 1991)

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For more information, see our [privacy statement](#)

**First name** Required

Ryan

**Last name** Required

O'Leary

**Organisation you represent** If applicable. Please only answer this question if you are speaking on behalf of an organisation.

Palmerston North Airport Limited c/- The Property Group Limited

**Postal address** Required

**Email** Required

ROleary@propertygroup.co.nz



**Phone** Required Please provide a daytime contact number

027 469 8992

## Hearing

A hearing date will be confirmed once submissions close.

**Do you want to speak to Council in support of your further submission? (Select 1 option)**

- ☒ Yes
- ☐ No

Answer this question if you selected 'Yes' in *Hearing > Do you want to speak to Council in support of your further submission?*

**Will you consider presenting a joint case with other submitters who make a similar further submission at a hearing? (Select 1 option)**

- ☒ Yes
- ☐ No

## Relevance

**What is the best to describe your relevance? (Select 1 option)**

- ☐ I am a person representing a relevant aspect of the public interest.
- ☒ I am a person who has an interest in the proposal that is greater than the interest the general public has.
- ☐ I am the local authority for the relevant area.

**Explain/specify the grounds for saying that you come within this category**

*Example - Submission number [insert submission reference number here] directly affects the property at XXX, which I own*

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## **Further Submission on Plan Change I to the Palmerston North City Operative District Plan by Palmerston North Airport Limited**

### **Clause 8 of Schedule 1 to the Resource Management Act 1991**

**To:** The Governance Team  
Palmerston North City Council  
Private Bag 11034  
Palmerston North 4442  
*Submission by email via: [Submission@pncc.govt.nz](mailto:Submission@pncc.govt.nz)*

**Name of Further Submitter:** Palmerston North Airport Limited

1. **Palmerston North Airport Limited ("PNAL")** makes this further submission on Proposed Plan Change I – Increasing Housing Supply and Choice ("**PCI**") to the Operative District Plan, in opposition to original submission **SO118-1 Nigel Hughes**.

### **About Palmerston North Airport Limited**

2. PNAL is a Council Controlled Trading Organisation and limited liability company formed in December 1989. PNAL owns and operates the Palmerston North Airport having acquired the Airport from the Crown in January 1990.
3. Palmerston North Airport is:
  - 3.1 a Lifeline Utility under the Civil Defence Emergency Management Act 2022 and an asset of regional and national importance.
  - 3.2 a key piece of infrastructure and plays a fundamental role in the social and economic wellbeing of the city, region and the country.
  - 3.3 over 200ha in area with an estimated maximum capacity of 700,000 annual passenger movements. It meets the definitions of Nationally Significant

## FS - 05-4

Infrastructure in clause 1.4 of the National Policy Statement on Urban Development 2020

- 3.4 A key logistics and distribution connector for the region and is one of only three airports within New Zealand that operate 24 hours a day (without curfew).
- 3.5 an important national transport link for the local, regional and national community and has a major influence on the regional economy.
- 4. PNAL is a network utility operator and a requiring authority under section 166 of the Resource Management Act 1991 (“**the RMA**” or “**the Act**”).
- 5. Given its role in managing Palmerston North Airport, PNAL has an interest greater than the general public.
- 6. PNAL will not gain an advantage in trade competition through this further submission.

### **PNAL's Airport Safeguarding Framework**

- 7. PNAL implement an *Airport Safeguarding Framework* to ensure efficient and effective avoidance or mitigation of adverse effects of the Airport's operations. Currently, the District Plan includes:
  - 7.1 *Airport Noise Boundaries*: an Air Noise Contour set at a noise exposure level of 65 Ldn, an Inner Noise Contour set at 60 Ldn and Outer Control Contour set at the lower 55 Ldn. Land use controls have been established within each noise contour to ensure reverse noise sensitivities are mitigated.
  - 7.2 *Airport Protection Surfaces*: spatially defined surfaces associated with the operations of an aerodromes runway system. They define the volume of airspace that is to be kept free from obstacles in order to minimise the danger to aircraft. The Palmerston North City District Plan includes Airport Protection Surfaces for Palmerston North Airport.
  - 7.3 *Runway End Protection Areas (REPA)*: a spatially defined area where land uses are restricted given the risk of aircraft undershooting or overshooting a runway.

## FS 05-5

### Reasons for further submission

8. PNAL makes this further submission in respect of submission **SO188-1** by **Nigel Hughes** which seeks to amend the zone extent of the Medium Density Zone (MDZ) to include the 7.0861ha site on the corner of Tutaki and Kelvin Grove Roads.
9. The reasons for this further submission are:

9.1 PNAL opposes further intensification of residential development within the inner and outer noise contour. The majority of the site is located in the outer noise contour control area (55Ldn – 60Ldn) and part of the site is within the inner noise contour control area (60 Ldn – 65 Ldn). This is shown in Figure 1 below.

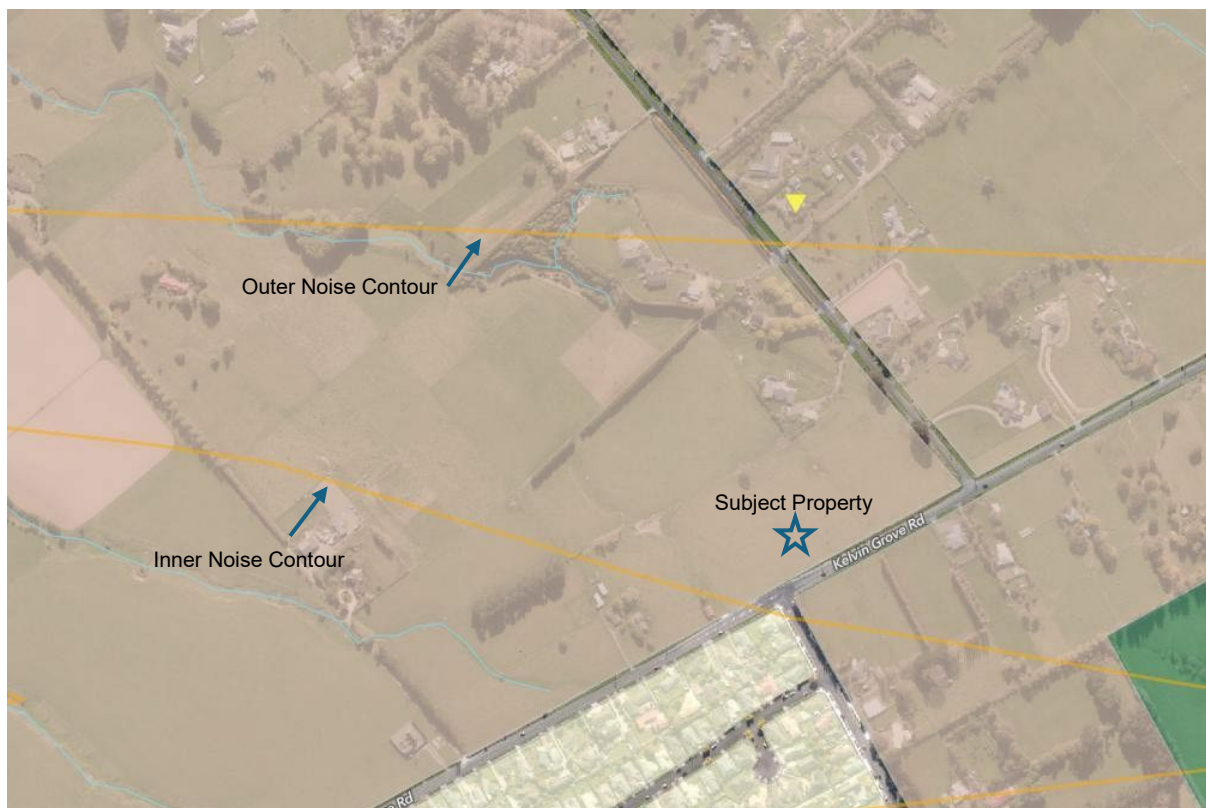


Figure 1. District Plan Zoning of the Site (Source: PNCC District Plan Maps)

- 9.2 PNAL seek to ensure reverse sensitivity effects are adequately managed within the Airport's noise contours, including through additional resource consent, development and consultation requirements;
- 9.3 Residential development of this site could adversely affect aeronautical operations and navigation, including introducing new sources of light, glare, radio and electrical interference.

## FS 05-6

- 9.4 The location of the site does not meet the criteria identified by Palmerston North City Council (“**Council**”) for inclusion in the MDZ based on their walkable distance. In particular, there are no schools or shopping centres within 800 metres of the site. The site is not in close proximity to any other key employment centre which might make rezoning more favourable.
- 9.5 The site is not identified in the Council’s Future Development Strategy 2024, which informs where Council will prioritise land rezoning to support housing needs and how Council will unlock land for development through their Infrastructure Strategy and Long-Term Plan. Equally the submission would not meet the requirements of the NPS-UD.
- 9.6 The scope of the Plan change is also limited to the existing residential zone and excludes zoning new greenfield growth areas outside the existing residential zone<sup>1</sup>. The submitters site is quite removed from the existing residential zone so the submission is considered to be beyond the scope of the plan Change.
- 9.7 There is no evidence to justify Clause 3.6 of the National Policy Statement for Highly Productive Land (“**NPS-HPL**”).
- 9.7.1 The site is identified Land Use Capability Class 2 in the New Zealand Land Resource Inventory (Land Use Capability 2021 map); is zoned Rural under the District Plan; and is therefore considered to be “highly productive land” under the NPS-HPL.
- 9.7.2 Clause 3.6 of the NPS-HPL restricts urban rezoning of highly productive land. Council may allow urban rezoning of highly productive land only if:
- (a) the urban rezoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the NPS-UD; and
  - (b) there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same

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<sup>1</sup> As set out in the public notice and within the Section 32 Evaluation Report which states that the plan change includes rezoning part of the residential zone to create a Medium Density Residential zone. It is not a full plan review and specifically excludes zoning new greenfield growth areas outside the existing residential zone (See page 2 and 3).

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locality and market while achieving a well-functioning urban environment; and

- (c) the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.


9.7.3 There is no evidence to suggest that Council could justify rezoning the site in accordance with the exemption requirements under Clause 3.6(1)(a) through to (c).

### **Relief Sought**

- 10. PNAL seeks that Council reject the original submission insofar as it seeks to amend the zone extent of the Medium Density Zone (MDZ) to include the 7.0861ha site on the corner of Tutaki and Kelvin Grove Roads.
- 11. PNAL has an interest in any other consequential change to provisions (District Plan rules, objectives and policies) in support of its further submission.
- 12. PNAL wishes to be heard in support of its further submission.

**DATED** 24 March 2025

**Palmerston North Airport Limited**



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**Alex Fechney**

**Safety & Operations Manager**

**ADDRESS FOR SERVICE:**

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*Palmerston North 4442*

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## **Further Submission on Proposed Plan Change I to the Palmerston North City Plan by Kāinga Ora – Homes and Communities**

### **Clause 8 of Schedule 1 to the Resource Management Act 1991**

**To:** Palmerston North City Council  
***Submission by email via: [submission@pncc.govt.nz](mailto:submission@pncc.govt.nz)***

**Name of Further Submitter:** Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities (“Kāinga Ora”)** makes this further submission on **Plan Change I** (“PCI”) to the Palmerston North City Plan in support of/in opposition to original submissions to the **PCI**.
2. Kāinga Ora has an interest in PCI that is greater than the interest the general public has, being an original submitter on PCI with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in Palmerston North City.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the PCI.

### **Reasons for further submission**

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
  - (a) The reasons set out in the Kāinga Ora primary submission on the PCI.
  - (b) In the case of the Primary Submissions that are opposed:

- (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 (“**RMA**”);
  - (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
  - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
  - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
- (c) In the case of Primary Submissions that are supported:
- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
  - (ii) The reasons set out in the Primary Submissions; and
  - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

**DATED 24 March 2025**

**Kāinga Ora – Homes and Communities**



  
\_\_\_\_\_  
**Brendon Liggett**

**Manager – Development Planning**

**ADDRESS FOR SERVICE:**

*Kāinga Ora – Homes and Communities*

*PO Box 74598*

*Greenlane, Auckland*

*Attention: Development Planning Team*

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## Appendix A – Further Submission Table



Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO14.1	Kate Vandemeer	MRZ-S7	Amend	Set a percentage of units to have greater minimum outdoor space	I would like council to consider implementing some allowances and incentives to build 2-3 bedroom homes that have sufficient outdoor space to allow for owning pets, because I feel this is an area of need in our communities.	Oppose	Kāinga Ora consider that the outdoor space as identified in the Plan Change appropriately provides for suitable outdoor amenity, with areas in the mapped MDRZ having appropriate access to outdoor space	Disallow
SO22.1	Nate Sextus	Zone extent	Support	Extend Hokowhitu boundary to include Anderson St	Anderson St is street that is close to the bus stop. Many of the properties are either rented (a lot to students) on own by KO. It would make sense to include this so there is an option to put more housing in, particularly for social and student flats	Support	Kāinga Ora support the increase in spatial extent in Hokowhitu.	Allow
SO25.1	Tayte Cozens	Entire Plan Change	Support	Identify which properties are heritage properties.	I own a home in the area which could potentially have 3 units, but would like to know which homes? Should there be a register?	Oppose	Kāinga Ora do not support the inclusion of special character housing or additional heritage areas within this Plan Change and consider that this should be the topic of a separate hearing if this was of interest.	Disallow
SO48.2	Samuel Hill	General	Amend	Amend comprehensively	The process for vegetation clearance (particularly taonga, native vegetation species) and soil disturbance on a would-be new development area needs to be a lot more stringently policed. Property developers should have to submit a full plan of their ecological strategies to offset the ecological damage, carbon footprint of the development and also their climate change mitigation plans and policies, before a single sod of earth is moved	Oppose	Kāinga Ora opposes the inclusion of requiring an ecological strategy and considers that the landscaping standards as notified are appropriate, subject to the Kāinga Ora submission. Further, the City View Objectives within Section 2 appropriately address climate change	Disallow
SO48.3	Samuel Hill	General	Amend	Require planting of trees and other vegetation, and wetland construction, as part of new development	The current proposals do not sufficiently mitigate the effects of climate-change events such as flooding and the urban island heat effect.	Oppose in part	Whilst Kāinga Ora support planting of additional vegetation, Kāinga Ora oppose including the requirement to include tree planting or wetland development as rules, noting that the current controls provide for onsite methods	Disallow
SO78.1	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-P2	Support in part	Amend MRZ-P2 as follows: Provide for residential activities and buildings, including papakāinga*, that do not meet the permitted activity standards, where they are well-designed and compatible with the planned built form of the zone <u>and avoid reverse sensitivity effects on existing non-residential activities on adjoining sites.</u>	The Fuel Companies generally support MRZ-P2 but are concerned that the policy only deals with the compatibility of the built form within the zone and does not extend to adjoining sites. As such, the Fuel Companies request that the policy also addresses reverse sensitivity effects on existing non-residential activities on adjoining sites. Adding words to this effect would ensure that where a proposal does not comply with the MRZ standards, reverse sensitivity effects are adequately considered in the policy	Oppose	Kāinga Ora oppose the inclusion of 'avoid' policies, especially when considering the introduction of activities anticipated within the zone. The additional wording is also considered unsuitable to be tagged to this policy.	Disallow
SO78.2	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-R7	Support in part	Retain R7.2(3) as notified subject to the changes requested in relation to MRZ-P2	The Fuel Companies support the restricted discretionary activity status and the matters of discretion under MRZ-R7.2(3) provided that the changes requested to MRZ-P2 are accepted so that reverse sensitivity effects are adequately addressed.	Oppose	Kāinga Ora oppose the inclusion of consideration of reverse sensitivity effects on non residential activities within the MRZ and particularly any avoid policies which would therefore impose non-complying activities	Disallow
SO78.3	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-R8	Support in part	Retain as notified subject to the changes requested in relation to MRZ-P2 above.	The Fuel Companies support the restricted discretionary activity status and the matters of discretion under MRZ-R8, provided that the changes requested to MRZ-P2 are accepted so that reverse sensitivity effects are adequately addressed.	Oppose	Kāinga Ora oppose the inclusion of consideration of reverse sensitivity effects on non residential activities within the MRZ and particularly any avoid policies which would therefore impose non-complying activities	Disallow
SO78.4	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-R17	Support	Retain as notified	The Fuel Companies support the Discretionary activity status of MRZ-R17. The activity status is supported as it will allow consideration of objectives and policies, particularly MRZ-P2 and reverse sensitivity effects on adjoining non-residential sites.	Oppose	Kāinga Ora oppose the inclusion of consideration of reverse sensitivity effects on non residential activities within the MRZ. Those non residential activities are provided with appropriate standards to comply to mitigate adverse effects	Disallow

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Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO78.5	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-S3	Support in part	Amend MRZ-S3 as follows: Matters of discretion where the standard is infringed: 1. Shading effects on adjoining sites; 2. Loss of privacy effects on adjoining residential sites; 3. Dominance effects on adjoining residential sites. And 4. Safety effects on the land transport network and pedestrians. <u>5. Reverse sensitivity effects on adjoining non-residential sites</u>	The Fuel Companies generally support standard MRZ-S3. However, due to the reduced setbacks enabled in the MRZ, the Fuel Companies consider that the policy could be strengthened by including reverse sensitivity effects as a matter of discretion where the standard is infringed. This would ensure that adverse reverse sensitivity effects are adequately considered and mitigated, where necessary.	Oppose	Kāinga Ora oppose the inclusion of consideration of reverse sensitivity effects on non residential activities within the MRZ. Those non residential activities are provided with appropriate standards to comply to mitigate adverse effects.	Disallow
SO78.6	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-S4	Support in part	Amend MRZ-S4 as follows: Matters of discretion where the standard is infringed: 1. The effects of increased building coverage on stormwater discharges from the site and flows; 2. Shading effects on adjoining sites; 3. Loss of privacy effects on adjoining residential sites; and 4. Dominance effects on adjoining residential sites. <u>5. Reverse sensitivity effects on adjoining non-residential sites</u>	The Fuel Companies generally support standard MRZ-S4. However, due to the high building coverage enabled in the MRZ, the Fuel Companies consider that the policy could be strengthened by including reverse sensitivity effects as a matter of discretion where the standard is infringed. This would ensure that adverse reverse sensitivity effects are adequately considered and mitigated, where building coverage is exceeded.	Oppose	Kāinga Ora oppose the inclusion of consideration of reverse sensitivity effects on non residential activities within the MRZ. Those non residential activities are provided with appropriate standards to comply to mitigate adverse effects.	Disallow
SO104.1	Hern Teo-Sherrell	Entire Plan Change	Amend	a) New buildings must not encroach on the privacy of neighbouring properties b) No on-street parking overnight c) Fewer car parks as amenities are close by d) Multi-storeys should have minimal impact on street character e) Multi-storeys should be no more than 2 storeys and total height less than 11m f) Mix of one-bedroom and larger units/houses g) Mix of social and private housing	Any new building should not encroach on the privacy of neighbouring properties, or lead to congestion of the street, e.g. no on-street parking overnight and do not provide carparks as amenities and facilities would be close by. Multi-storey units should have minimal impact on street character and no more than two storeys to prevent shading on other properties. Buildings should have a variety of bedroom numbers incorporated into the design as opposed to box-like buildings or terrace housing as they can be an eye-sore. A mix of private and social housing should also be provided to ensure inclusivity.	Oppose	Kāinga Ora oppose any provisions requiring a ratio or mix of private and social housing. Tenure of dwellings is not a RMA matter.	Disallow
SO107.3	Powerco Limited	MRZ-R8	Amend	Add an additional matter of discretion: <u>2. Whether there is a need to provide space on the development site for the provision of essential services</u>	To address issues of an increase in demand for essential services, Powerco considers that consideration should be given to the provision of essential services when four or more units are proposed on a site – to determine whether space needs to be set aside on the development site for any required essential services.	Oppose	The subdivision and infrastructure provisions appropriately address this matter, further with Council having an engineering plan approval process which ensures that this space has been adequately created as part of the development.	Disallow
SO116.3	Kevin and Ngaire Smidt	MRZ-P3	Oppose	Noise and safety protection for surrounding properties	Criteria do not address whether if a more communal development number of vehicles coming and going and people density	Oppose	Kāinga Ora oppose the inclusion of noise standards in relation to the number of dwellings.	Disallow
SO116.5	Kevin and Ngaire Smidt	MRZ-P5	Support	Note the earlier MRZ-P2 is blurring residential and non-residential. This blurring should be avoided	Not stated	Oppose in part	Kāinga Ora support MRZ-P5 as proposed, noting the operational need for some activities to be located in the residential zone.	Disallow
SO116.15	Kevin and Ngaire Smidt	MRZ-R7	Amend	For some dwelling such as papakāinga, there may need to be a specified limit on number of residents, and enhanced fire alarm and sprinkler systems.	Increased probability of disturbance, personal safety and risk to adjacent properties.	Oppose	Kāinga Ora oppose the inclusion of additional restrictions on papakāinga or similar housing.	Disallow
SO116.21	Kevin and Ngaire Smidt	MRZ-R13	Oppose	Restrict the areas where community houses can be built, and increase separation between buildings and facilities and adjacent residential properties.	Wording unclear about numbers of residents to be accommodated and/or numbers of employees. Too large a part of city potentially affected. Likely to be noisy and disturbed with many people coming and going- not compatible with quiet enjoyment	Oppose	Kāinga Ora oppose the submission and consider that community housing where the standards of the district plan are met are similar in functionality to a residential dwelling and should not be subject to increased performance standards.	Disallow
SO129.6	Roanne Hautapu	Entire Plan Change	Amend	Require that a percentage of multi-storey homes are genuinely accessible	Accessibility in housing is either not considered or done badly.	Oppose	Kāinga Ora, whilst recognising the need for fully universal accessibility do not support the inclusion of accessible design as a standard or requirement within the District Plan and believe this should be delivered by the free market based on the occupants and demand for housing.	Disallow

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Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO137.13	Rangitāne o Manawatū	MRZ-P6	Support in part	<p>Amend so the policy:</p> <ul style="list-style-type: none"> <li>- directs that the impacts of climate change are accounted for when designing on-site mitigation measures.</li> <li>- promotes nature-based solutions in preference over hard engineering solutions.</li> <li>- refers to requiring on-going maintenance and repair of stormwater treatment and mitigation devices</li> <li>- requires that current levels of risk, as identified in the Stormwater Servicing Assessment Report, are reduced to a level of risk that has been deemed acceptable to the community prior to, or at the time of, development.</li> </ul>	<p>Maintaining peak flows at pre development levels (i.e. hydraulic neutrality) may be inadequate in areas which are already subjected to significant stormwater ponding, and in order to future proof our urban environments. The areas at greatest risk are concentrated on the western side of the city where our Māori/Pacifica communities live. Rangitāne requests that current levels of risk, as identified in the Stormwater Servicing Assessment Report, are reduced. Additional capacity should be built into the system, to achieve climate change resilience.</p> <p>Nature-based solutions should be adopted in preference over hard engineering solutions, and this should be signaled in the policies. This approach is consistent with best practice, the NPS-IB, NAP and NPS FW, and the Proposed National Policy Statement for Natural Hazard Decision-Making.</p> <p>Assessments of risk should be informed by an understanding of the communities' tolerance for that risk. This should be informed by the Council's strategic work on natural hazards (including consultation with the community),</p>	Oppose in part	<p>Kāinga Ora support the policy as notified and consider that setting a baseline or preference for natural solutions will impact on either the development cost or development viability of some projects where located in an area of risk, reducing the viability of delivering housing.</p>	Disallow in part
SO137.14	Rangitāne o Manawatū	MRZ-P7	Support in part	<p>Amend the policy to include:</p> <ul style="list-style-type: none"> <li>- reference to the need to consider the impacts of climate change and future resilience when designing mitigation measures.</li> <li>- Include a direction that nature-based solutions should be adopted in preference over hard engineering solutions where practicable, when recommending mitigation measures.</li> <li>- direction that for those areas where modelling predicts down-stream adverse effects from development of a site, the mitigation measures may need to include reducing post-development flows so that they are only a percentage of the pre-development flows, to address the constraints on the existing network and existing downstream flood risk.</li> <li>- direction that the recommended mitigation measures in the stormwater management plan be implemented and maintained on an ongoing basis and that this may be secured through consent notices where appropriate.</li> </ul>	<p>The Stormwater Servicing Assessment for PCI identifies at section 4.3.2 that some areas of the proposed MDZ are predicted to have a negative downstream effect on other areas if re-development and intensification occurs in those areas, and that this will require a site specific stormwater management plan to be prepared, including a that mitigation may include requiring post-development flows to match a percentage (e.g. 80%) of pre development flows, due to the constraints on the existing network and existing downstream flood risk. The explanation is that this is because development will increase the volume of runoff, not just peak flow rates.</p> <p>Rangitāne appreciate that there may be future works to improve stormwater capacity in these areas. However this is important technical direction that should be identified and clearly signalled via the policy, so that it provides strong direction to future applicants, and to Council staff processing consent applications. There is a risk that without this direction in the policy, proposed mitigation measures may not address these risks.</p> <p>Consistent with national guidance in the NPS-IB, NAP and NPS-FW, nature-based solutions should be preferred over hard engineering solutions where this is practicable, and this should be signaled in the policy. Simply preparing a stormwater management plan is not sufficient, the mitigation measures it recommends must be implemented and the policy should indicate this. It is important that mitigation measures are implemented as designed and maintained in good working order. This should be secured through</p>	Oppose in part	<p>Kāinga Ora support the policy as notified and consider that setting a baseline or preference for natural solutions will impact on either the development cost or development viability of some projects where located in an area of risk, reducing the viability of delivering housing.</p> <p>Kāinga Ora also oppose the addition of a requirement to improve the baseline condition, noting that the development will have existing use rights for the level of effect on the environment.</p> <p>Kāinga Ora also oppose the inclusion of a reference to consent notices within a policy. Whilst it is acknowledged that this is considered appropriate for reducing the ongoing risk the policies of the District Plan should not include this level of detail.</p>	Disallow in part

## FS - 06-7

Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO137.15	Rangitāne o Manawatū	New policy	Support	<p>Insert a new policy that states that:</p> <p>Within 12 months of the plan change becoming operative the Council will:</p> <ul style="list-style-type: none"> <li>- develop and implement a programme for requiring as built plans of stormwater management measures to be submitted, installation compliance checks and regular monitoring and maintenance for all on-site stormwater attenuation measures; and</li> <li>-prepare and publish information and guidance for homeowners on how to install, maintain and repair permeable paving, and the importance of not increasing impermeable areas within their properties without appropriate accompanying stormwater attenuation measures.</li> </ul> <p>To support this management approach, Rangitāne suggests that the Council:</p> <ul style="list-style-type: none"> <li>-Develops, resources and funds a monitoring and compliance programme, building on any existing monitoring programme;</li> <li>-Amends the Stormwater Bylaw, including in relation to charges and levies, to enable and implement the monitoring and compliance programme, and to integrate with the stormwater management approach in the</li> </ul>	Rangitāne are concerned that, as currently drafted, the plan change does not adequately address the need for on-going maintenance and performance of the stormwater attenuation devices that will be relied on to manage stormwater. This matter should be signalled through a policy and/or stated method in the Plan, and then developed through the LTP. Successful stormwater management over time will rely on the individual private and public components of the system being operated, maintained and upgraded in an efficiently and integrated way. Reductions in the effectiveness of private stormwater components over time will jeopardise the effectiveness of the system as a whole. While Rangitāne support a mixed centralised and decentralised stormwater approach, it must be supported by a comprehensive management system that is established at the outset. Such a programme should operate as a user pays system to ensure it can be sustained over time, given the anticipated reliance on on-site measures to address stormwater constraints for an unknown period of time into the future.	Oppose in part	Kāinga Ora oppose the inclusion of the policy as proposed, noting this is repetitive of monitoring and infers conditions of consent for managing stormwater solutions. The proposed wording is too specific and instructive for a policy.	Disallow in part
SO137.17	Rangitāne o Manawatū	MRZ-P9	Support in part	Amend the policy so that it signals that such materials should be avoided in the first instance, or else mitigated.	Rangitāne support the requirement to address the potential water quality issues from building materials at source, rather than requiring downstream treatment. However the policy does not clearly signal this and should be more directive about avoiding these materials in the first instance, rather than just mitigating their use.	Oppose in part	This is appropriately addressed within the provisions of the PC and should not be within the policy.	Disallow in part
SO137.20	Rangitāne o Manawatū	MRZ-P12	Support in part	Amend the policy so that it refers to retaining and integrating existing vegetation and using replacement planting to contribute to sustaining ecosystem services, including stormwater retention, air and soil quality, shade and shelter, cooling and habitats	The policy doesn't sufficiently recognise or seek to retain the Rangitāne's preference is that replacement planting ideally uses indigenous species that would be expected to have been in that place, and that replacement planting is chosen on the basis of its ability to assist with reducing soil erosion, maintaining soil fertility, providing habitat/corridors for native species and contribution to increasing indigenous vegetation cover in the city. The policy doesn't sufficient recognise or seek to retain the multiple ecoservices of vegetation in an urban context.	Oppose in part	While Kāinga Ora support the intent of the policy, the use of indigenous plants is not always possible and difficult to source, especially on larger projects.	Disallow in part
SO137.24	Rangitāne o Manawatū	MRZ-R8	Support in part	Amend MRZ-R8 to include a reference to Policy MRZ-P8, which relates to water sensitive design and Policy RMZ-P10 Energy Efficiency. These policies are relevant considerations for development proposals.	Policy MRZ-P8 and P10 are relevant considerations for decision-making under the restricted-discretionary rule, and should be referenced.	Oppose in part	<p>Kāinga Ora oppose the inclusion of these policies in relation to the density of the development. Kāinga Ora consider that MRZ-S10 appropriately provides for onsite stormwater generated through the proposal and is the chapeau of this policy into the District Plan.</p> <p>Kāinga Ora also oppose the inclusion of energy efficiency within the rule framework as this is not a measurable concept and has no standards or performance measures against this policy.</p> <p>Kāinga Ora consider that such matters are better placed within the City</p>	Disallow in part
SO137.31	Rangitāne o Manawatū	MRZ-S9	Support in part	Amend the standard so that there is explicit direction to require maintenance of the permeability of the permeable surface on an ongoing basis. Prepare additional guidance on maintenance and repair of permeable paving, and avoiding additional impermeable areas once residential units are occupied and include it in Volume 2 of the District Plan, with a link in the Advice Note.	Rangitāne is concerned the current drafting will not be adequate to address these effects in the longer term, as there is no requirement for maintenance of the permeability of these surfaces. In addition, while the reference in the Advice Note to the permeable pavement construction guide from Auckland Council is helpful and should be retained, that guidance does not address how to maintain and repair such surfaces. Additional guidance is needed on these matters and to educate people on the reasons why permeable surfaces are required, and why additional impermeable surfaces should not be installed on sites once	Oppose in part	Kāinga Ora oppose the inclusion of explicit direction within the standards of the District Plan, noting that maintenance of stormwater and permeable surfaces may form part of the conditions of consent depending upon compliance. It is also noted that monitoring of effectiveness for first flush permeable space is difficult to achieve.	Disallow in part

## FS - 06-8

Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO137.40	Rangitāne o Manawatū	SUB-MRZ-R1	Support in part	Rangitāne seek an amendment to the matter of discretion to state: The extent to which on-site mitigation measures will support and align with the city-wide Stormwater Strategy, or any catchment or sub catchment plan to implement the city-side Stormwater Strategy. Amend the matters of discretion to: -Include a new matter that addresses when and how on-site mitigation measures will be installed and how they are proposed to be maintained, including by whom;- Make it certain that the Council will have scope to require amendments to ensure neighbouring stormwater attenuation devices are not compromised by new development (e.g. overland flow from a new development being directed across a boundary and overloading the capacity of neighbouring systems). Amend the advice note to include a reference to the use of consent notices in relation to installation and maintenance of any on-site stormwater mitigation	Rangitāne support the requirement to achieve alignment of any on-site mitigation measures with the city wide Stormwater Strategy that is currently being prepared. As it will take some time for individual catchment plans to be prepared to implement the strategy, it is important that alignment with the Stormwater Strategy itself is also achieved (as this will provide direction for future catchment plans). It is important that any mitigation measures required as part of a subdivision proposal are implemented as designed and maintained in good working order. This should be secured through consent notices. The first matter of discretion refers to the effects of earthworks on on-site and off-site flooding and overland flow paths, but is not as specific as providing discretion to consider the potential effects of on-site stormwater mitigation measures, on adjacent areas (i.e. off-site).	Oppose in part	Kāinga Ora oppose the addition of this matter of discretion, as the city-wide stormwater strategy is not complete at the time of submission. Kāinga Ora consider the additional matters of discretion to be outside of the scope of the Plan Change and function as conditions of consent in relation to maintaining the asset. Kāinga Ora also oppose the inclusion of an advice note which requires a consent notice as part of a matter of discretion and consider that this should be at the processing officers discretion for managing effects on the environment.	Disallow in part
SO137.41	Rangitāne o Manawatū	SUB-MRZ Notification clauses	Support	That the ability to limited notify applications under these rules, including Horizons Regional Council and Rangitāne, is retained.	Rangitāne are not convinced that the proposed provisions in PCI are sufficiently certain or directive such that, following redevelopment for housing, effective stormwater management within the plan change area can be guaranteed. Limited notification should be retained as there is uncertainty that the provisions will ensure good outcomes. Rangitāne submission is that stormwater effects of re-zoning for residential intensification are unlikely to be appropriately mitigated in the long term, and there should be an opportunity for potential effects to be identified and addressed through notification processes. This should include consideration of the need to notify Horizons Regional Council and Rangitāne.	Oppose in part	Kāinga Ora support the inclusion of notification preclusion and consider that the effects of subdivision on the environment where the standards and rules are observed should be exempt from limited notification to give certainty for developers.	Disallow in part
SO152.1	Kimberly Coates	Standards	Amend	Include universal design as a minimum standard.	Accessible universal design even fits so many in society from wheelchair users to elderly or make ease to ensure all new builds have a proportion of accessible dwellings.	Oppose	Kāinga Ora, whilst recognising the need for fully universal accessibility, do not support the inclusion of accessible design as a standard or requirement within the District Plan. This matter is also more appropriately addressed within the Building Act.	Disallow
SO159.2	John and Margaret Wood	Standards	Amend	Amend section size from proposed 350 sq. metre to 450-500 sq. metre	Concerns about lack of space to grow vegetables, fruit trees and flowers, amount of concrete causes heat problems, play outside, dry clothes, for storage, pets. Concern about parked cars over footpaths. Concerns about impacts on well-being.	Oppose	Kāinga Ora oppose a minimum allotment standard, noting that the rules and standards of the Plan Change largely allow for the construction of medium density housing, which is required to meet population growth in Palmerston North over the next 30 years and has a much smaller demand for section size.	Disallow
SO166.1	Palmerston North City Council	MRZ-P3	Amend	Amend MRZ-P3 as follows ... <u>3. Site layouts provide adequate rubbish recycling collection and storage facilities;</u>	This matter needs to be addressed when assessing applications for four or more residential units .	Oppose	In line with the Kāinga Ora submission, Kāinga Ora consider that MRZ-P3 is too detailed and reads as assessment criteria.	Disallow

Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO166.2	Palmerston North City Council	MRZ-P7	Amend	Amend MRZ-P7 as follows MRZ-P7 - Development* in the Stormwater Overlay Avoid development* in the Stormwater Overlay unless the Council* is satisfied that a site-specific stormwater management plan prepared by a suitably qualified stormwater design consultant (preferably with experience in water sensitive design* concepts and elements) identifies: 1. identifies the location, scale and nature of the development* proposed for the site; 2. identifies the extent of flood and/or overland stormwater flow hazards; 3. identifies the on-site and off-site effects of the proposed development* on people, property and the environment; 4. recommendsed mitigation measures to remedy or mitigate the on- and off-site effects of the development*; and demonstrates that the on- and off-site adverse	Clarity of drafting for plan implementation.	Oppose	In line with the Kāinga Ora submission, Kāinga Ora opposes the overlay is deleted from this plan change until such a time that all information is public and further modelling is completed.	Disallow
SO166.19	Palmerston North City Council	MRZ-R24	Amend	Amend MRZ-R24 as follows MRZ-R24 Stormwater treatment for parking and manoeuvring areas, and access ways for or more carparks (including garages) 1. Activity status: Permitted Where: The cumulative area of any parking area, manoeuvring area and access ways on a site is less than 100m2. 2. 1.Activity status: Restricted Discretionary Where: a.MRZ-R24.1(a) is not met ... Advice Note: The Council prefers the use of bioretention systems for stormwater treatment, for example raingardens, filter strips or swales. Further information is available in	Having an area as the trigger for compliance is better for administration of the rule.	Oppose in part	Whilst Kāinga Ora agree that this rule should be based on an area and not on the number of capering spaces, Kāinga Ora consider that 100m2 is too restrictive.	Disallow in part
SO166.21	Palmerston North City Council	MRZ-S1	Amend	Amend MRZ-S1 as follows .Buildings or structures (excluding garages and accessory buildings) may not exceed a maximum height of 11 metres above ground level. Except that: •50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1 metre, where the entire roof slopes 15° or more, as illustrated in MRZ-Figure 1 below. 2.Garages or accessory buildings may not exceed a maximum height of 2.8m above ground level. MRZ-S1 does not apply to:	A maximum height restriction on accessory buildings is not necessary as they can be controlled via the 11m permitted activity height for all buildings and structures, which includes an accessory building. Having a 2.8m maximum height for accessory buildings will result in many resource consent applications as typical small garages and sheds can be up to 3m at the roof apex. Reference to MRZ-S20 is to provide guidance to the applicable standard.	Support	Kāinga Ora supports the deletion of a maximum height for accessory buildings allowing for uses above garages and more uniform built form.	Allow



## FS - 06-10

Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO166.22	Palmerston North City Council	MRZ-S2	Amend	Amend MRZ-S2 as follows 1.All buildings and structures <del>(excluding garages and accessory buildings)</del> must be contained beneath recession planes, inclined inwards at right angles, of: a.45° measured from a point of 5.0 metres above ground level <u>and perpendicular to the boundary</u> , for the greater distance of either 15 metres, or the first two-thirds of the site, from the boundary with a public road; and b.45° measured from a point of 2.8 metres above ground level <u>and perpendicular to the boundary</u> for the remainder of the site. <u>2.Garages and accessory buildings must be contained beneath a 45° measured from a point 2.8 metres above ground level and perpendicular to the boundary.</u> ... 2. For rear sites, where the site does not contain any boundaries with a public road other than for an access strip*; all buildings and structures must be contained beneath a line* of 45° measured from a point of 2.8 metres above ground level <u>and perpendicular to the boundary. -inclined inwards at right angles</u>	Clarifies drafting to aid with interpretation of the standard. Inclusion of a height in relation to boundary for garages and accessory buildings enables consideration of shading, loss of privacy and dominance effects for larger structures, as would occur with other buildings and structures.	Oppose	Kāinga Ora consider that a separate recession plane for accessory buildings is inappropriate given the effects would be the same if a dwelling.	Disallow
SO166.28	Palmerston North City Council	MRZ-S6	Amend	Delete	The purpose of the standard is to help reduce the heat map of a residential development which is a positive climate change initiative. Other standards such as 30% permeable surfaces, 20% landscaped area will assist to achieve a <u>lower heat map. Standard not considered necessary</u>	Support	In line with the Kāinga Ora submission, Kāinga Ora strongly supports deletion of this rule.	Support
SO166.36	Palmerston North City Council	MRZ-S19	Amend	Amend MRZ-S19 as follows <u>2.A communal rubbish storage area must be provided for developments of four or more residential units.</u>	This is an appropriate matter to include in the standard.	Oppose	Kāinga Ora consider that requiring a communal rubbish area for 4 or more units is not necessary and questions what effect this is managing if rubbish is stored at each individual unit. Kāinga Ora consider that possibly a rule could require a communal area for above ground units instead.	Disallow



## FS - 06-11

Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO166.47	Palmerston North City Council	New rule	Amend	Insert the following new rule <u>SUB-MRZ- R1A Subdivision within the Stormwater Overlay</u> <u>1.Activity status: Restricted Discretionary</u> <u>Council's* discretion is restricted to:</u> <u>a.The effect of earthworks on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation;</u> <u>b.Setting of minimum floor levels;</u> <u>c.Setting of maximum impervious surface area;</u> <u>d.Subdivision design and layout and the size, shape and arrangement of proposed allotments;</u> <u>e.The extent to which on-site mitigation measures will support and align with any catchment or sub-catchment plan to implement the city-wide Stormwater Strategy</u> <u>f.Whether the subdivision design and layout meet the requirements of the Council's* Engineering Standards for Land Development; and</u> <u>g.The relevant matters in SUB-MRZ-P3 and SUB-MRZ-P4.</u> <u>Advice Note:</u> <u>Service connections to the public stormwater network must comply with the Palmerston North Stormwater Bylaw, service connections to the public wastewater network must comply with the Palmerston North Wastewater Bylaw and service connections to the public water supply network must comply with the Palmerston North Water Supply Bylaw.</u> <u>Notification:</u> <u>An application under this rule is precluded from being notified.</u>	Provides clarity when processing and applying for applications within the Stormwater Overlay	Oppose in part	In line with the Kāinga Ora submission, Kāinga Ora opposes the overlay is deleted from this plan change until such a time that all information is public and further modelling is completed. However, if complete and fulsome evidence is provided to support the Stormwater Overlay, then Kāinga Ora supports the suite of assessment criteria and preclusion of public notification.	Disallow in part
SO170.3	Leith Consulting	MRZ-S3	Amend	Please amend the wording as follows: 1. Front - 1.5 metres from a public road where there is no parking in the front yard Front - 5.5 metres for that part of the frontage where a parking space is provided but no garage (internal or standalone) Side <del>and Rear</del> 1 metre We also support any consequential changes to the plan as a result of our relief sought.	For consistency, the requested amendment to the standard has included the word rear as this is the wording of the MDRS and rear is also included in table two and might have been accidentally left out?	Support	Kāinga Ora support the amendment for plan clarity.	Allow
SO170.7	Leith Consulting	MRZ-S7	Amend	Amend as follows: Where the outdoor living space is provided at ground level it must provide: a. a minimum area of 30m² which can accommodate a 4.5 metre diameter circle for a residential unit or community house* with <del>two</del> three or more bedrooms; or b. a minimum area of 20m² which can accommodate a 4 metre diameter circle for a residential unit or community house* with <del>one bedroom</del> up to two bedrooms; and We also support any consequential changes to the plan as a result of our relief sought.	Support larger outdoor living areas for houses which can accommodate larger households. Granny flats of up to 60 sqm can contain up to two bedrooms and to be enabling of this for infill housing -20sqm outdoor living spaces would be sufficient for these types of minor dwellings.	Support	Kāinga Ora supports the proposed amendments.	Allow
SO171.2	Anne Allan	Standards	Amend	Include a minimum site size	The number of buildings per site is meaningless without a site size.	Oppose	Kāinga Ora oppose a minimum allotment standard, noting that the rules and standards of the Plan Change largely allow for the construction of medium density housing, which is required to meet population growth in Palmerston North over the next 30 years.	Oppose
SO185.57	Phocus Planning	MRZ-S13	Oppose	Amend to only apply to apartment terraced style units or Remove requirements.	Requiring a consent for a dwelling that does not have a door facing the street is excessive and over regulation. Creates a situation where a consent could be required for this non-compliance. What does that process look like? This appears as overreach as in many cases it would be difficult to quantify the level of adverse effect of not doing this. Will not always be an appropriate and achievable design	Support	In line with the Kāinga Ora submission, Kāinga Ora support this submission and consider that whilst desirable to have a front door facing the street, this is not always possible with site shape or layout.	Allow

## FS - 06-12

Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO185.59	Phocus Planning	MRZ-S15	Support in part	Requires clarification of what will be captured.	For example, if there is an existing situation where there is non-compliance, would an alteration to the back of the house require this matter to be addressed? It shouldn't, however, there have been historic examples with other standards where this has happened (i.e. lack of onsite	Support	Kāinga Ora support the need for clarification to alterations to existing infringements.	Allow
SO185.66	Phocus Planning	SUB-MRZ-O1	Support in part	Retain wording but clarify that it is appropriate to do non-medium density residential subdivisions in the zone.	Need to make sure that it is clear that not all subdivision in this zone have to be for medium density purposes.	Oppose	In line with the Kāinga Ora submission, Kāinga Ora supports the objective as written and disagrees that lower density developments should be encouraged within the MRZ.	Allow
SO202.2	New Zealand Defence Force	MRZ-O5	Amend	Amend Objective MRZ-O5 to provide appropriate protection against adverse effects (including reverse sensitivity effects) of development in the vicinity of infrastructure and physical resources of regional or national importance.	NZDF seeks a policy framework and provisions that give effect to the RPS and provide appropriate protection against adverse effects (including reverse sensitivity effects) associated with new development and noise sensitive activities on existing infrastructure, activities, and physical resources of national or regional importance.	Oppose	Kāinga Ora consider this inclusion unnecessary given that the MRZ is located within urban areas already and not within the vicinity of infrastructure and physical resources of regional or national importance.	Disallow
SO202.3	New Zealand Defence Force	MRZ-P11	Amend	<b>MRZ-P11 Effects on buildings and activities near infrastructure and physical resources of regional or national importance</b> - Manage Avoid the effects on of new or altered buildings and noise sensitive activities near existing infrastructure and physical resources of regional or national importance including by requiring: 1. Appropriate setbacks and design controls where necessary to protect infrastructure and physical resources of regional or national importance from reverse sensitivity effects. achieve appropriate protection of infrastructure and mitigation of avoid effects on adjacent noise sensitive activities:- 2. All future buildings, earthworks and construction	NZDF seeks a policy framework and provisions that give effect to the RPS and provide appropriate protection against adverse effects (including reverse sensitivity effects) associated with new development and noise sensitive activities on existing infrastructure, activities, and physical resources of national or regional importance.	Oppose	Kāinga Ora consider this inclusion unnecessary given that the MRZ is located within urban areas already and not within the vicinity of infrastructure and physical resources of regional or national importance.	Disallow
SO203.9	Enviro NZ	MRZ-S19	Support in part	1.Each residential unit must have access to a screened rubbish storage area which is sized to accommodate one 240l wheelie bin and one recycling crate with a minimum area of 1.5m2 and a minimum dimension of 1 metre in any direction, except: 2.a. where Communal rubbish storage areas are provided. 2.The location of any storage area must be screened or located so as not to be visible from a public road and/or adjacent sites, and must not encroach into driveways, manoeuvring areas, parking and outdoor living spaces. 3.Bins must be accessible for residents to get to the kerb. 4.Where kerbside collection is employed, a kerbside space of 1m per dwelling is available without impeding the public footpath. 5.Where on-site waste collection is used: a. the space must be accessible for the collection vehicle. b.where there are more than 20 residential units on one site, and the site fronts an Arterial or Collector Road, on-site turning for trucks is required. Matters of discretion where the standard is infringed: 1.Safety effects on the land transport network and pedestrians; 2.Effects on the safe internal site circulation and manoeuvring areas, including for pedestrians; and 3.Accessibility, odour and noise effects of rubbish storage location	The proposed standard needs to be fit for purpose, and should provide sufficient space to accommodate different kerbside collected waste streams both now and in the future. It does not give effect to the NZ Waste Strategy.	Oppose in part	Whilst Kāinga Ora agrees that access to rubbish collection is important and should not be impeded, Kāinga Ora oppose the need to consider odour and noise effects. This would require technical reports in some instances which is considered too onerous.	Disallow in part

FS - 06-13

Submission Point	Original Submitter	Provision	Position	Relief Sought	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
SO210.1	Natural Hazards Commission Toka Tū Ake	New rule	Amend	Include a liquefaction hazard overlay for the moderate-very high liquefaction potential and rules restricting development within liquefaction prone areas.	Rules for development within liquefaction prone areas should follow the MBIE/MfE Planning and Engineering Guidance for Potentially Liquefaction Prone Land1. Notably, areas assigned a high liquefaction classification should require a site-specific assessment of liquefaction issues.	Oppose in part	Whilst Kāinga Ora supports identifying natural hazards, any such layer should only be included if thoroughly assessed, further, Kāinga Ora does not consider restricting density is an appropriate mechanism for areas that are not classified 'high risk'.	Disallow in part

# Further submission on Proposed Plan Change I: Increasing housing supply and choice



Submitted on	24 March 2025, 12:18PM
Receipt number	5
Related form version	1

## Your contact details

First name	Abhimanyu Singh
Last name	Garhwal
Organisation you represent	
If applicable. Please only answer this question if you are speaking on behalf of an organisation.	
Postal address	173 Highbury Avenue Highbury Palmerston North 4412
Email	abhimanyugarhwal@gmail.com
Phone	02124 222 66
Please provide a daytime contact number	

## Hearing

Do you want to speak to Council in support of your further submission?	No
--	----

## Relevance

What is the best to describe your relevance?	I am a person representing a relevant aspect of the public interest.
Explain/specify the grounds for saying that you come within this category <i>Example - Submission number [insert submission reference number here] directly affects the property at XXX, which I own</i>	PLAN CHANGE I: INCREASING HOUSING SUPPLY AND CHOICE directly affects the property at 173 Highbury Avenue Highbury , which I own

## Your submission

### Submission table

You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.

Submission point 1	Name of submitter / Submission number
--------------------	---------------------------------------

## FS - 07-2

*Example - Jane Doe [Submission 18]*

Abhimanyu Singh Garhwal

---

**Address or Email of submitter (if provided)**

abhimanyugarhwal@gmail.com

---

**What's your attitude towards this submission?**

Support

---

**What are the particular parts of the submission that you support or oppose?**

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.*

*Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.*

Retain as notified

---

**Please tell us the reasons for my support or opposition.**

*Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.*

Increased supply of housing for Palmy people

---

**Allow or disallow?**

Allow

---

**I seek that the whole or part (describe part) of the submission be allowed or disallowed.**

*Please give precise details.*

*Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.*

---

**You can attach documents in support of your submission point**

---

# Further submission on Proposed Plan Change I: Increasing housing supply and choice



Submitted on	21 March 2025, 8:30PM
Receipt number	4
Related form version	1

## Your contact details

First name Sarah

Last name Ruawai

### Organisation you represent

If applicable. Please only answer this question if you are speaking on behalf of an organisation.

Postal address 278, Ruahine Street

Email sarah@riverdale.school.nz

Phone +642102273277  
Please provide a daytime contact number

## Hearing

Do you want to speak to Council in support of your further submission? Yes

Will you consider presenting a joint case with other submitters who make a similar further submission at a hearing? Yes

## Relevance

What is the best to describe your relevance? I am a person representing a relevant aspect of the public interest.

### Explain/specify the grounds for saying that you come within this category

*Example - Submission number [insert submission reference number here] directly affects the property at XXX, which I own*

submission about the proposed medium density housing Summerhays Street PN which directly affects my property, which we own

## Your submission

### Submission table

# FS - 08-2

You can click the 'Add another submission point' button to comment on more provisions, or 'Continue' to move to the next stage of the online form. Hit 'Save' at any time to save your progress. You'll be given the option to return to the form later to complete it.

## Submission point 1

### Name of submitter / Submission number

*Example - Jane Doe [Submission 18]*

Sarah Ruawai

### Address or Email of submitter (if provided)

sarah@riverdale.school.nz

### What's your attitude towards this submission?

Oppose

### What are the particular parts of the submission that you support or oppose?

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.*

*Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.*

I completely oppose this proposal

### Please tell us the reasons for my support or opposition.

*Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.*

this will affect the security in the area

### Allow or disallow?

Disallow

### I seek that the whole or part (describe part) of the submission be allowed or disallowed.

*Please give precise details.*

*Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.*

the whole proposal should definitely be disallowed

### You can attach documents in support of your submission point

## Submission point 2

### Name of submitter / Submission number

*Example - Jane Doe [Submission 18]*

Sarah Ruawai

### Address or Email of submitter (if provided)

sarah@riverdale.school.nz

### What's your attitude towards this submission?

Oppose

### What are the particular parts of the submission that you support or oppose?

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.*

*Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.*

you should completely stop any plans to do this proposal

### Please tell us the reasons for my support or opposition.

*Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.*

We are near retiring and are very concerned about the crime rates that occur in this type of housing areas. We have friends who are in the

# FS - 08-3

police force who have warned us about the crime they have to deal with constantly in other housing areas in the town. We do Not want this any where near our house

---

## Allow or disallow?

Disallow

---

## I seek that the whole or part (describe part) of the submission be allowed or disallowed.

*Please give precise details.*

*Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.*

whole submission needs to be stopped and disallowed in this area

---

## You can attach documents in support of your submission point

---

### Submission point 3

## Name of submitter / Submission number

*Example - Jane Doe [Submission 18]*

Sarah Ruawai

---

## Address or Email of submitter (if provided)

sarah@riverdale.school.nz

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## What's your attitude towards this submission?

Oppose

---

## What are the particular parts of the submission that you support or oppose?

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.*

*Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.*

totally oppose the proposal in any form

---

## Please tell us the reasons for my support or opposition.

*Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.*

The value of our house will decline with this housing behind our property. We have worked all our lives to get to this point and if you go ahead with this horrifying idea it will mean we will lose out and we have been people who have contributed positively to the community. This would be a huge slap in the face for us

---

## Allow or disallow?

Disallow

---

## I seek that the whole or part (describe part) of the submission be allowed or disallowed.

*Please give precise details.*

*Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.*

disallow the whole idea!

---

## You can attach documents in support of your submission point

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### Submission point 4

## Name of submitter / Submission number

*Example - Jane Doe [Submission 18]*

Sarah Ruawai

---

## Address or Email of submitter (if provided)

sarah@riverdale.school.nz



## What's your attitude towards this submission?

Oppose

## What are the particular parts of the submission that you support or oppose?

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.*

*Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.*

totally oppose this proposal to put a slum in our area

## Please tell us the reasons for my support or opposition.

*Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.*

our son works for a contractor who constantly have to fix up the horrible messes these houses get into after they have been lived in and destroyed by these tenants. They are horrified that we might have this housing behind us. They do not look after them.

## Allow or disallow?

Disallow

## I seek that the whole or part (describe part) of the submission be allowed or disallowed.

*Please give precise details.*

*Example - That part of the submission which requests retaining the current Structure Plan as shown on the Proposed District Plan maps is allowed.*

the whole proposal needs to be stopped and disallowed

## You can attach documents in support of your submission point

### Submission point 5

## Name of submitter / Submission number

*Example - Jane Doe [Submission 18]*

Sarah Ruawai

## Address or Email of submitter (if provided)

sarah@riverdale.school.nz

## What's your attitude towards this submission?

Oppose

## What are the particular parts of the submission that you support or oppose?

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal.*

*Example - Jane Doe supports all areas that have not been zoned appropriately in the Proposed District Plan planning maps.*

completely oppose this proposal

## Please tell us the reasons for my support or opposition.

*Example - I support the submitter's request to retain the Height and Density Standards as shown on the notified Proposed District Planning Maps.*

you need to stop this plan

## Allow or disallow?

Disallow

## I seek that the whole or part (describe part) of the submission be allowed or disallowed.

*Please give precise details.*

*Example - That part of the submission which requests retaining the current*

*Structure Plan as shown on the Proposed District Plan maps is allowed.*

Why do you propose to build these houses that continue to cost the city and ratepayers like us to maintain and continue to have to pay for the upkeep of the houses and items in them. We know they cost the city millions. Why would you not sell the land to a private investor, make lots of money for the city as a profit get rates for the land as an ongoing income and make the area a safe, valuable and graet place for positive contributing rate paying citizens like us??? It seems outrageous to us that you would deem this proposal as a positive for the Terrace End community. I wonder if any of you actually live in the area. Probably not. I would presume this type of housing will not be proposed in the new Summerhill Drive area or the new Kelvin Grove area...

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**You can attach documents in support of your submission point**

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