

**BEFORE THE HEARINGS PANEL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of proposed Plan Change G: Aokautere Urban  
Growth to the Palmerston North City Council  
District Plan

---

**SUPPLEMENTARY STATEMENT OF AARON PHILLIPS ON BEHALF OF PALMERSTON NORTH  
CITY COUNCIL**

**PARKS AND RESERVES**

**Dated: 11 March 2024**

---

## TABLE OF CONTENTS

A. INTRODUCTION.....	3
B. SCOPE.....	3
C. EXISTING AND PROPOSED RESERVES FOR PCG .....	4
D. RESIDENTIAL LOTS AND 400M/500M WALKING DISTANCES .....	8
E. PEACE TREE RESERVE.....	10
F. WALKWAYS – CONNECTIONS BETWEEN RESERVES .....	12
G. RESERVE LOCATIONS – ‘FIXED’ VERSUS ‘FLEXIBLE’ .....	13
H. ATTACHMENTS .....	14

## SUPPLEMENTARY STATEMENT OF AARON PHILLIPS



### A. INTRODUCTION

- [1] My full name is Aaron Phillips.
- [2] I prepared a s 42A report dated 15 September 2023 (**s 42A Report**) and reply evidence dated 28 November 2023 (**Reply**) on Parks and Reserves matters for PCG.
- [3] My experience and qualifications are set out in my s 42A Report.
- [4] I repeat the confirmation given in my s 42A Report that I have read and will comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023, and that my supplementary report has been prepared in compliance with that Code.



### B. SCOPE


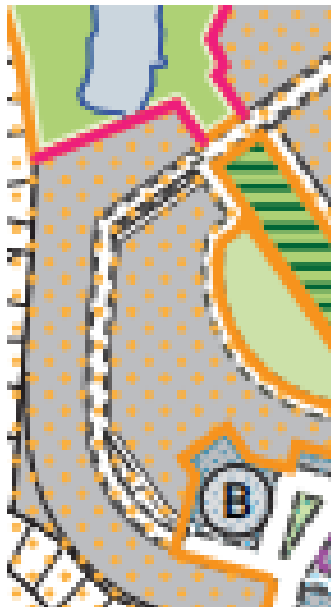
- [5] My supplementary statement responds to a number of matters raised by the Hearing Panel during the hearing in the week of 4 December 2023. Specifically:
- (a) Details of existing and planned reserves, including information as to lot size and acquisition history;
  - (b) The number of lots predicted to be outside the 400m and 500m walking distances;
  - (c) Providing confirmation that a 400m walking distance from reserve #4 covers the medium density area in the central part of PCG;
  - (d) Addressing the effect of Peace Tree Reserve's lack of open space provision; and
  - (e) Whether local reserve locations should be treated as 'fixed' or 'flexible'.

**C. EXISTING AND PROPOSED RESERVES FOR PCG**


Reserve	Type and Size	Background/Acquisition History
<p>#1 - Adderstone Reserve – Abby Road portion</p> 	<p>Neighbourhood reserve 25,500 sqm</p>	<p>Existing undeveloped reserve.</p> <p>Part of a larger parcel (20 ha) purchased as part of Aokautere Comprehensive Development Zone work in 1988. Some land was subsequently sold or used for other purposes, for example roading and a sale to IPC in 1995.</p> <p>Assumed development in 2024/25, from a budget separate to Aokautere Growth Programmes. Modest development is planned.</p> <p>Reserve exceeds size of standard neighbourhood reserve by 21,000 sqm.</p> <p>Council decision on 5 April 2023 to retain, following proposal to sell a part.</p>
<p>Not labelled - Adderstone Reserve – Pacific Drive portion</p> 	<p>Not assumed to be retained (see next column) 3,000 sqm</p>	<p>Existing undeveloped reserve.</p> <p>Acquisition history as per Adderstone Reserve – Abby Road portion (same land parcel).</p> <p>Council decided to retain until community facility needs are identified.<sup>1</sup></p> <p>Area is zoned residential. Some possibility of sale in the future to fund community facilities, or to offset non-development contribution funded reserve costs. Alternatively, the land may be retained as reserve, or redeveloped for a community facility. The Pacific Drive portion of Adderstone Reserve is not required to meet reserve open space provision due to the proximity of the larger 2.4 ha of open space on Adderstone off Abby Road and Pacific Drive Reserve 400 m away.</p>

<sup>1</sup> [https://palmerstonnorth.infocouncil.biz/Open/2023/04/COU\\_20230405\\_MIN\\_11112.PDF](https://palmerstonnorth.infocouncil.biz/Open/2023/04/COU_20230405_MIN_11112.PDF) at pgs 10-11.

Reserve	Type and Size	Background/Acquisition History
<p data-bbox="371 253 663 286">#3 Pacific Drive Reserve</p> 	<p data-bbox="719 253 922 320">Neighbourhood Reserve</p> <p data-bbox="719 342 842 376">3,276 sqm</p>	<p data-bbox="946 253 1390 320">Existing developed reserve, comprising two parcels.</p> <p data-bbox="946 342 1398 589">Acquired in two stages in 1993 and 1995 during subdivisions. File notes on Lot 2 DP 80999 state that it was purchased. Assumption is that Lot 1 DP 77345 was also purchased, but this would require more in-depth research to confirm.</p>
<p data-bbox="371 1003 647 1037">#5 Peace Tree Reserve</p> 	<p data-bbox="719 1003 839 1104">Special Character Reserve</p> <p data-bbox="719 1126 842 1160">2339 sqm</p>	<p data-bbox="946 1003 1273 1037">Existing developed reserve.</p> <p data-bbox="946 1059 1177 1093">Purchased in 2006.</p> <p data-bbox="946 1115 1398 1317">Features a tree grown from a cutting from the last tree that survived the Nagasaki bombing, which was donated to the city. Mix of New Zealand natives through to Japanese themed garden.</p> <p data-bbox="946 1339 1398 1552">In 2007/2008 consideration was given at a Council officer level to increase the size of the reserve by purchasing an additional 3 sections. This did not proceed (cost at the time was \$439,000).</p>

Reserve	Type and Size	Background/Acquisition History
<p data-bbox="371 248 660 282">#2 Central East Reserve</p> 	<p data-bbox="711 248 909 315">Neighbourhood Reserve</p> <p data-bbox="711 338 879 405">3,400 sqm of open space</p>	<p data-bbox="941 248 1158 282">Proposed reserve</p> <p data-bbox="941 304 1398 472">Acceptable deviation from specified minimum reserve size based on being adjacent to a gully, with likely walkway connection. See paragraph [6] below.</p>
<p data-bbox="371 775 592 842">#4 – Central West Reserve</p> 	<p data-bbox="711 775 909 842">Neighbourhood Reserve</p> <p data-bbox="711 864 847 898">4,800 sqm</p> <p data-bbox="711 920 909 1167">This area excludes the adjacent green hatched 'Wetland Feature' (which is 6,900 sqm).</p>	<p data-bbox="941 775 1158 808">Proposed reserve</p> <p data-bbox="941 831 1398 1077">More intensive development of the reserve has been provided for in Council budgets<sup>2</sup> if medium density is taken up. The budgets allowed for this reserve are approximately twice the level of a standard reserve development budget.</p>

<sup>2</sup> PNCC Draft 2024/34 Ten Year Plan.

Reserve	Type and Size	Background/Acquisition History
<p data-bbox="371 248 647 282">#6 – Southern Reserve</p> 	<p data-bbox="711 248 916 405">Suburb Reserve 8,000 sqm of open space plus amenity of gully</p>	<p data-bbox="940 248 1158 282">Proposed reserve</p> <p data-bbox="940 300 1399 618">Larger open space will include Level of Service expectation for this category of reserve, as covered in Parks Asset Management Plan - for example youth play facilities in addition to junior play facilities. Budget assumptions are approximately twice that of a standard reserve.</p> <p data-bbox="940 636 1305 669">Also see paragraph [7] below.</p>

[6] During the hearing, I confirmed that the expected size of proposed neighbourhood reserves would be 4,500 sqm. However, I have since received clarification from Mr Burns that proposed Reserve #2 is expected to be 3,400 sqm. I am comfortable with this notwithstanding it is less than the optimal 4,500 sqm. The reserve will be adjacent to a gully which as I explained to the Hearing Panel will add to the amenity value and give the impression of a larger space. Further, it has adequate road frontage, and there is the opportunity for a walkway connection.

[7] In my Reply, I recommended relocating Reserve #2 to avoid locating a playground in close proximity to a large stormwater pond.<sup>3</sup> I discuss the implications for the proposed change in terms of location below. However, following questioning during the hearing, I have had further discussions with Ms Baugham regarding the functionality of these ponds, as addressed in Ms Baugham's supplementary statement.<sup>4</sup> Subsequently, I want to confirm my view with regard to the location of the junior playground in proposed Suburb Reserve #6 (as described in the table above) relative to the proposed stormwater pond. I am comfortable that any risks associated with the stormwater pond can be minimised through positioning of junior play in the reserve. There is a much greater separation distance available in Reserve #6 than would be possible in Reserve #2, the pond is located in a gully with geographic separation provided by slopes, and the use of planting will create natural barriers.

#### **D. RESIDENTIAL LOTS AND 400M/500M WALKING DISTANCES**

[8] I have considered the implications of a change in location for Reserve #2 (as between the location, as notified, and the location recommended in my Reply) as described below.

##### **Scenario 1: Reserve #2 retained at location identified on notification of PCG**

[9] **Attachment A** to this supplementary statement identifies:

- (a) 232 residential lots are located outside a 500m walking distance;

---

<sup>3</sup> Noting Ms Baugham's view that the ponds are not designed to be full with water outside of storm events.

<sup>4</sup> Supplementary Statement of Reiko Baugham – Stormwater (11 March 2024) at [12]-[13].



- (b) Medium density at the end of Promontory D3 is approximately 1km from a reserve; and
- (c) 78% total coverage (i.e. % of residential lots located within a 500m walking distance) is achieved under this scenario, which I note would improve if medium density is not taken up on the promontories.

**Scenario 2: Reserve #2 relocated in accordance with recommendation in Reply**

[10] **Attachment B** to this supplementary statement identifies:

- (a) 172 residential lots are located outside a 500 m walking distance;
- (b) Medium density at the end of Promontory D1 is approximately 900 m from a reserve;
- (c) Medium density at the end of Promontory D2 is approximately 700 m from a reserve; and
- (d) 84% total coverage is achieved under this scenario. Again, this would improve if medium density was not taken up on the promontories.

[11] Scenario 2 delivers a small net benefit of 50 additional residential lots being within the target walking distance, and a 6% coverage improvement.

[12] The 84% coverage is slightly above the city's overall coverage achieved (at 80%). Achieving 100%^ coverage is considered impractical and presents high costs for small gains. It would also be inconsistent with existing reserve provision through the wider city. The relocation of the reserve is supported without the addition of further reserves.

**Medium density area and 400m walking distance**

[13] For completeness, Figure 1 (below) is also provided to demonstrate that a 400m<sup>5</sup> walking distance from proposed Neighbourhood Reserve #4 covers the entire proposed medium density area in the central portion of the PCG area.

---

<sup>5</sup> 400m walking distance is used for the medium density area, 500 m for standard residential areas.

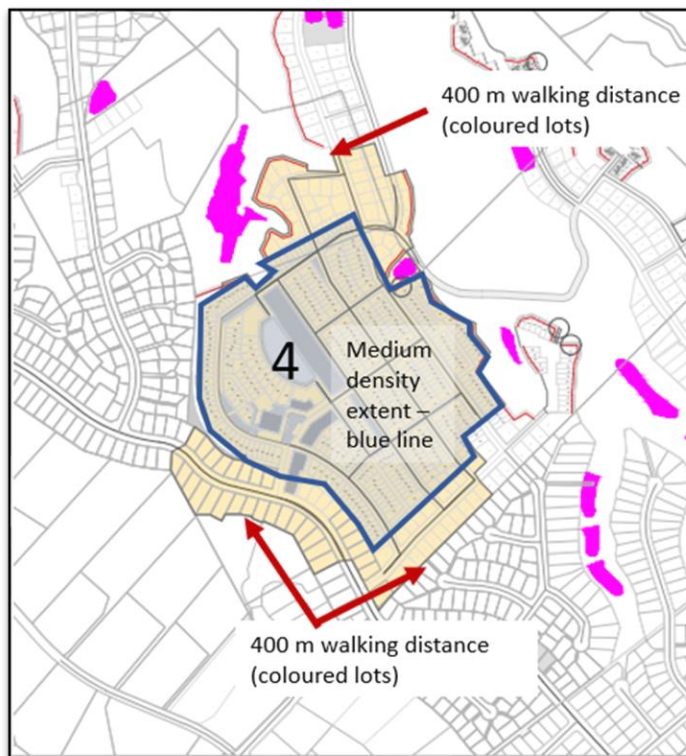


Figure 1: 400m walking distance vs medium density

**E. PEACE TREE RESERVE**

[14] I have also considered further the extent of open space provision at Peace Tree Reserve, and its play facilities compared to standard reserves.

[15] Figure 3 (below) illustrates the effective catchment Peace Tree Reserve would service if the 500m walking distances are measured from Pacific Drive Reserve in the north, and the new Suburb Reserve #6 to the southeast.



Figure 2: shows the catchment overlaps for Peace Tree with Pacific Drive Reserve and new suburb reserve #6.

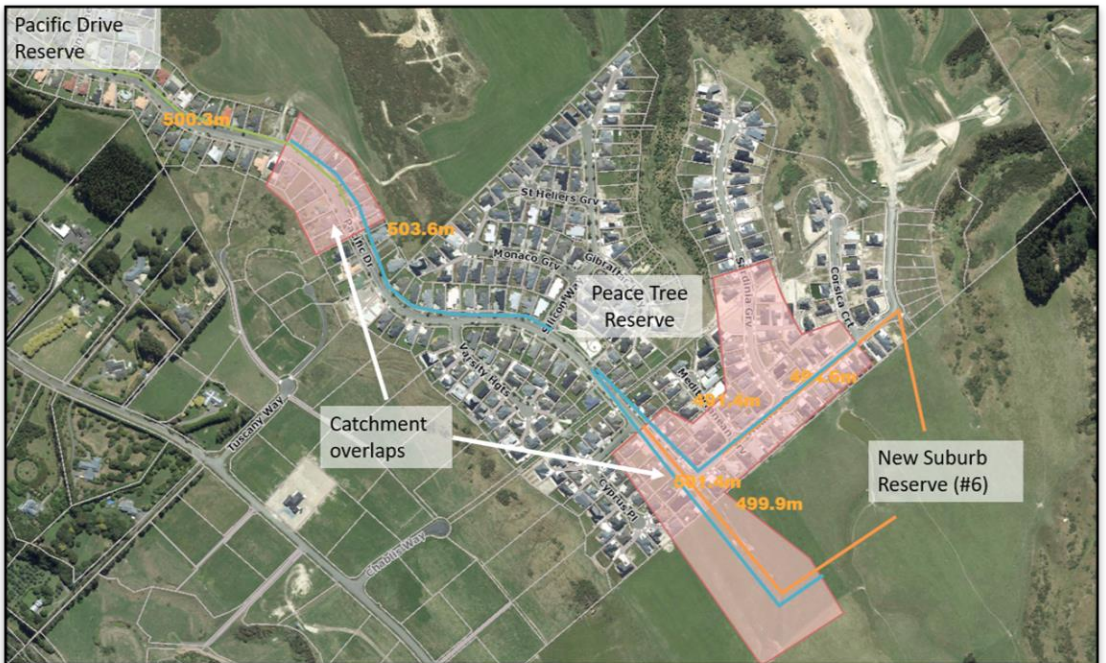


Figure 3: Effective catchment from Pacific Drive Reserve and new suburb reserve #6

[16] I am comfortable that additional open space is not required over and above the three new reserves proposed for PCG for several reasons. In summary:

- (a) Peace Tree Reserve will have a relatively small catchment due to the overlap in the walking catchments with the Pacific Drive Reserve, and the new Suburb Reserve #6, as well as the lifestyle nature of the Turitea Valley to the south west.
- (b) The new Suburb Reserve #6 will provide 8,000 sqm of flat open space which will be approximately 3.5 times the size of Peace Tree Reserve, have a strong open space development style, and include youth facilities.
- (c) There is the added value of gullies in the wider area for general amenity.

**F. WALKWAYS – CONNECTIONS BETWEEN RESERVES**

[17] The Panel were interested in connectivity between reserves and timing of proposed walkways, as shown on the Structure Plans.

[18] The priority (and timing) of the development of walkways is driven by a variety of factors that are assessed as part of asset management planning and annual workplans. Factors include:

- (a) The staging and connectivity opportunities that arise through subdivision processes.
- (b) Value for money that can be achieved, i.e. locations where long lengths can be achieved more cost effectively, that are attractive for a wider cross-section of people to use, vs shorter, steeper and more expensive sections.
- (c) Completing strategic connections or linkages to destinations of note e.g. commercial areas, parks, between valleys which have longer driving distances.
- (d) Capacity available in walkways development team and contractor market.

[19] The most likely priority connections will be associated with areas already developed for housing e.g. the “backbone” connections from Sardinia Grove north down the gully to the long term cross gully connection planned from Johnstone Drive to Moonshine

Valley and Polson Hill. Timing of delivery will likely be driven through subdivision staging plans.

- [20] My s 42A Report included Figure 1 - Reserves and Walkway Plan (reproduced from the Aokautere Residential Plan Change Parks and Reserves Servicing Assessment, 2021, Appendix 13 to the s 32 Report) which indicates the anticipated degree of confidence in the deliverability of these walkway connections. The backbone connection is shown as a 'planned' connection, indicating a high degree of confidence that this connection will be delivered. By way of comparison, some connections are shown as 'likely connections'. This reflects the need for further site specific geotechnical assessment, design, and feasibility testing.

**G. RESERVE LOCATIONS – 'FIXED' VERSUS 'FLEXIBLE'**

- [21] As set out at paragraph 22 of my Reply, the provision for local reserves within the Structure Plan area (distribution and size) has been provided for in general accordance with the Council's Engineering Standards for Land Development. At paragraph 26 of my Reply, I noted that decisions regarding housing density and type on the promontories may impact the optimal distribution of reserves to ensure the best coverage. Other scenarios where the location of reserves may need to vary from that shown on the Structure Plan could be where geotechnical investigations require change to residential layouts; where the roading layout varies, which affects walking distance; or where alternative locations or extents of stormwater infrastructure such as detention pond locations are proposed. I am therefore supportive of Ms Copplestone's recommendations to enable some adjustment to the dimensions and location of the proposed reserves via the plan change provisions, provided that any alternative proposal is in general accordance with the Engineering Standards specifications and maintains the same or similar level of service as provided in the updated Structure Plan.

**11 March 2024**

**Aaron Phillips**

## H. ATTACHMENTS

**Attachment A:** Scenario 1 - Reserve #2 retained at location identified at PCG notification

**Attachment B** – Scenario 2: Reserve #2 relocated pursuant to Reply recommendation

# Scenario: Reserve #2 at location

One

KEY

-  Rural Residential Density 0.3-0.5DPH net
-  Existing Rural Area
-  Suburban Low Density avg 10-15DPH net
-  Existing Residential Area
-  Existing Institutional Area
-  Medium Density Village min avg 25DPH net
-  Potential apartment building location
-  Medium Density clusters min avg 25DPH net
-  Local Centre Mixed-Use min avg 50DPH net
-  Class D Land (refer Map 10.1A)
-  Retirement Village Variation Boundary



Retirement Village Variation

Red = outside 500m.

$$76 + 156 = 232$$

$\frac{232}{1050} = 78\%$  coverage.  
 if density drawn achieved  
 implies if standard  
 density delivered

Aokautere Structure Plan  
 Map 7A.4B  
 Lot Pattern & Density



0 50 100 200 500m

4705mm = 500m

**Attachment A**

# Scenario: Reserve #2 at location

Two

- KEY
-  Rural Residential Density 0.3-0.5DPH net
  -  Existing Rural Area
  -  Suburban Low Density avg 10-15DPH net
  -  Existing Residential Area
  -  Existing Institutional Area
  -  Medium Density Village min avg 25DPH net
  -  Potential apartment building location
  -  Medium Density clusters min avg 25DPH net
  -  Local Centre Mixed-Use min avg 50DPH net
  -  Class D Land (refer Map 10.1A)
  -  Retirement Village Variation Boundary



Retirement Village Variation

Red = outside 500 m.  
 --- = 400 m RE Medium Density  
 76 + 96 = 172

$\frac{172}{1050} = 84\%$  coverage  
 If density transferred/delivered improves if standard density delivered.

Scenario difference = 60 household improvement using relocated reserve.

Aokautere Structure Plan  
 Map 7A.4B  
 Lot Pattern & Density

