

SUMMARY OF EVIDENCE OF ANITA COPPLESTONE - PLANNING

PROPOSED PLAN CHANGE G – AOKAUTERE URBAN GROWTH

A. INTRODUCTION

[1] My full name is Anita Renie Copplestone and I prepared the s 42A report dated 15 September 2023 (**s 42A Report**) and Statement of Reply Evidence dated 28 November 2023 (**Reply Evidence**) on Planning on behalf of the Palmerston North City Council (**Council**) for proposed Plan Change G: Aokautere Urban Growth to the Palmerston North District Plan (**PCG**).

B. UNRESOLVED MATTERS

[2] As a result of planning expert conferencing, the planning experts agreed to a process for refining the noise, transport provisions and zoning map, but time constraints meant agreement was not reached on the detailed wording of the provisions, other than in relation to the capacity thresholds for the intersection upgrades in Table 7A.1.

Transport

[3] The amendments to the transport provisions which are agreed between Waka Kotahi and the Council are set out in Annexure 1 to my Reply Evidence. The main issue that remains unresolved with other parties, is the use of the performance standard in Rule R7A.5.2.2 to regulate development until such time as the intersection upgrades are operational. Mr Thomas would prefer to rely on non-regulatory methods, Ms Coates considers the standard does not fit the PCG approach, and Ms Pilkington prefers the operative provisions. I have prepared a flow diagram (**Attachment A**) which shows how the key provisions (as amended) would be used to assess safety and capacity effects on the network, when a subdivision consent application is received.

[4] I wish to identify a couple of errors in my Reply Evidence. At para 116, the wording of Rule R7A.5.6.1 should be as per the tracked changes version of this rule in Annexure 1 of my reply. In the Table in Annexure 1, the reference to Rule R10.6.2.2 should be to Rule R10.6.3.2, and the row with the Assessment criteria for Rule R10.7.4.6 in relation to Retirement Villages, does not show the notified or recommended amendments through the s 42A. That wording is available in the notified provisions and Appendix 1 to my s42A Report.

Housing delivery

- [5] As outlined in the Joint Witness Statement – Planning, little agreement has been reached on this topic. The main issues that remain outstanding are as follows.
- [6] Housing delivery timeframes: Mr Thomas, Ms Pilkington and Ms Coats consider that there is no justification to delay development. My position remains that Aokautere is intended to enable housing to meet development capacity in the medium to long term, and there is no need to enable short-term development prematurely. There are infrastructure upgrades - primarily transport and stormwater - that need to be undertaken as a precursor to development. The 2023 HBCA demonstrates there is sufficient development capacity elsewhere in the City to meet short term needs.
- [7] NPS-UD and Development Capacity: There is contention as to whether the proposed housing (particularly medium density) is feasible and reasonably expected to be realised, and therefore whether PCG provides sufficient development capacity. Mr Thomas, Ms Coats, Mr Fugle and Mr Farquhar consider there is a lack of evidence of feasibility or demand for medium density housing in Aokautere, as well as no developer appetite. Ms Coats considers the supporting infrastructure delivery costs are too significant/uncertain to confirm the resulting yield. My position remains that the Council has provided expert evidence through the reporting of Ms Allen and Mr Cullen, and statistical information through the 2023 HBCA, that demonstrates the requirements of the NPS-UD have been met.
- [8] Housing Density: The directive nature of the PCG provisions and Structure Plan in relation to medium density housing remain in contention. Mr Thomas, Mr Farquhar and Ms Coats consider variety should be led by demonstrated demand, and consider this doesn't exist for small, attached housing in Aokautere. An enabling approach is therefore preferred. Mr Thomas and Ms Coats consider the directive nature of PCG provides little choice and is not justified under s 32 of the RMA. I remain of the view that the directive approach to medium density in PCG is necessary, for the reasons set out in my Reply Evidence and s 42A Report.

Structure Plan Approach

- [9] The prescriptive nature of the Structure Plan and Precinct Plan more generally, remains a matter of contention. Mr Fugle, Mr Farquhar and Mr Thomas consider the Structure Plan is

too detailed/inflexible and lacks support from the key landowners; and that the implementing provisions are too prescriptive. Particular elements that remain in contention include:

- (a) The alignment of the gully link roads - Mr Fugle, Mr Thomas and Ms Coats question whether the alignments shown on the Structure Plan can be practicably achieved due to geotechnical and topographical constraints / costs.
- (b) The level of direction regarding delivery of the neighbourhood centre remains of concern for Mr Thomas and Mr Fugle with respect to viability, extent, location, proposed zoning, and interdependency with the medium density village area.

[10] On all these matters, I remain of the view that the level of detail and flexibility in the Structure Plan and PCG provisions, as amended by my s 42A Report, is appropriate. I note those recommendations addressed a broad range of performance standards relating to dwellings, local business activities, and the retirement village. My position remains that a neighbourhood centre in this location is a necessary precursor to many facets of a well-functioning urban environment in Aokautere, and therefore a directive approach is warranted.

Stormwater Management

[11] Contention remains as to whether the proposed Stormwater Management Strategy and implementing infrastructure (retention ponds, in-gully mitigation works, perimeter stormwater swale and associated gully setbacks) are the most efficient and effective approach to managing stormwater, and whether Council-led delivery of such works will hold up development (Mr Fugle, Mr Thomas). Mr Out and Ms Coats question the adequacy of the information (geotechnical, topographical) which informs the Strategy, and its effectiveness.

[12] Relying on the reporting of Ms Baugham and Mr Miller, I remain of the view that the Stormwater Management Strategy and implementing provisions, as amended by the s 42A Reports, is an appropriate response to the sensitive nature of the receiving environment. The planning experts agree that developer agreements are a mechanism that could be used to expedite infrastructure delivery. In response to Mr Fugle, Mr Thomas and Mr Out, and on Ms Baugham's recommendation, I have made minor amendments to the provisions in my Reply Evidence. The amendments provide flexibility for the stormwater perimeter swale to be up to 5m in width. A revised Figure 7A.1 has been inserted to provide more clarity as to how and where the perimeter swale should be designed and constructed.

Reserves

- [13] Mr Fugle and Mr Thomas consider there is insufficient justification for the extent of proposed reserves and the Conservation and Amenity zoning, and that some of the gully areas should be enabled to be filled and developed. I remain of the view that the extent of the reserves appropriately reflects the Council's intention to avoid further degradation of the gullies, to comprehensively manage the adverse effects of stormwater and erosion on these sensitive receiving environments, and to achieve ecological restoration of the gullies over time.
- [14] Mr Thomas, Ms Pilkington and Mr Moefili question the timing of vesting, and the circumstances in which it may be required. The recommended amendments to the relevant policy (7A: Policy 6.6) in my Reply Evidence clarify how vesting is intended to be coordinated with development. Early vesting is particularly important where development will be contiguous with the gullies, and where the gullies will receive stormwater. This timing is critical to achieve the outcomes stated above. Ms Pilkington and Mr Moefili have subsequently confirmed via email that the revised policy addresses their concerns.

Noise from the Manawatū Rifle Rod and Gun Club

- [15] Subsequent to expert conferencing, I have recommended amendments to the provisions to manage noise effects from the Gun Club via a non-complying activity status subdivision rule and supporting policies, as set out in my Reply Evidence. This will enable rural-residential development, subject to reduction in noise levels and provision of mitigation. Mr Moefili and Ms Pilkington have confirmed via email that these provisions address the matters raised in their evidence.

Rural Residential Zoning

- [16] Ms Pilkington seeks rezoning of rurally zoned land within the 'Green Block' to be within the Rural-Residential Overlay. As set out in my Reply Evidence, I do not support this request. I do however support the Rural-Residential Overlay being placed over the Waters' block, subject to imposition of the Gun Club noise subdivision rule identified above. This resolves the zoning request of Mr Moefili.

4 December 2023

Anita Copplestone

Attachment A

